



Tower Hamlets Borough Council

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## **New Local Plan**

Interim Integrated Impact Assessment Report  
Non-Technical Summary



Tower Hamlets Borough Council

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### **Interim Integrated Impact Assessment Report Non-Technical Summary**

**Type of document (version) Public**

**Project no. 70103752**

**Our Ref. No. 001**

**Date: June 2024**

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# Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft for LBTH	Final for Regulation 18 Consultation	Draft for Regulation 19	
Date	September 2023	October 2023	June 2024	
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Project number	70103752	70103752	70103752	

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# 1 Introduction

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## 1.1 Overview

- 1.1.1 The London Borough of Tower Hamlets (here in referred to as LBTH) is in the process of preparing a new Local Plan for the borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2038.
- 1.1.2 It will set out how the borough can sustainably develop, identifying the number of new homes, jobs and facilities needed to support the growing and changing population, as well as protecting all the features that the borough's communities cherish, such as town centres, parks and open spaces, waterways, cultural and historic buildings.

## 1.2 The New Local Plan

- 1.2.1 The new Local Plan will set out the vision for the future of the borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.
- 1.2.2 Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the borough will develop through to 2040.
- 1.2.3 The Local Plan seeks to build upon feedback from public consultations and respond to the many ideas and key issues identified by local communities, and stakeholders that have contributed to the plan-making process so far. It sets out a shared vision for the future of the borough and includes the proposed strategy and planning policies that will help guide and manage development in the area over the new Local Plan period (2025 to 2040).
- 1.2.4 The new Local Plan includes 72 policies and 24 site allocations, with an additional 16 alternative sites.
- 1.2.5 Further details on the vision, objectives and policies can be found in **Section 2** of the main **IIA Report**.

## 2 Methodology

### 2.1 What is IIA?

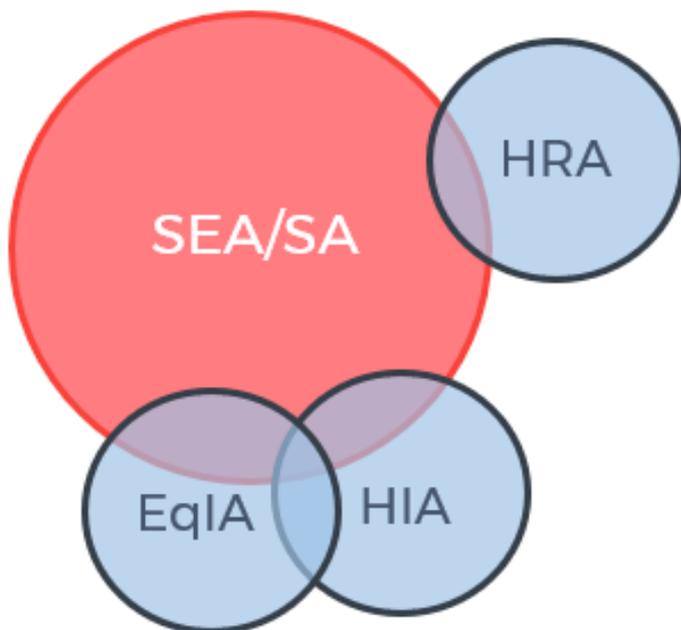
2.1.1 Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

2.1.2 The IIA combines the following assessment processes:

- Strategic Environmental Assessment (SEA);
- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

2.1.3 **Figure 2-1** below shows the relationship of each of these IIA elements.

**Figure 2-1 - Relationship of IIA Elements**



2.1.4 An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in

the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

2.1.5 Each component of the assessment has been described below:

- **SA:** The SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- **EqIA:** The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted. It covers the following nine Personal Protected Characteristics:
  - Age;
  - Disability;
  - Gender;
  - Gender reassignment;
  - Marriage and civil partnership;
  - Pregnancy and maternity;
  - Race;
  - Religion or belief; and
  - Sexual orientation.
- **HIA:** The HIA process is used to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level.
- **HRA:** The HRA assessment is undertaken to identify whether plans or projects will be likely to have a significant effect on a designated site. The stages of HRA assessment are as follows:
  - Stage 1: Screening: initially identifies the likely impacts upon a Natura 2000 site (sites designated as Special Areas of Conservation (SACs) and Special

Protection Areas (SPAs) in the UK) of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant;

- Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects. This is to determine whether there will be adverse effects on the integrity of the site;
- Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site; and
- Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI).

## 2.2 IIA Methodology

2.2.1 IIA is a continual process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects.

2.2.2 The key stages of the IIA process are the following:

- **Stage A:** Production of a scoping report which sets the context of the local plan, identified other relevant policies, plans and programmes, baseline information and sustainability objectives. This was undertaken in August 2023.
- **Stage B:** Assessment of draft policies and alternative policies and strategic and alternative sites and the preparation of the IIA Report. HIA and EqlA assessments are undertaken at the same time and the findings incorporated into the IIA Report. The report is then consulted on alongside the draft Local Plan (also referred to as Regulation 18 consultation);
- **Stage C (this stage):** Assessment of preferred policies and sites and the preparation the IIA Report. HIA and EqlA assessments are undertaken at the same time and the findings incorporated into the IIA Report;

- **Stage D:** Consultation on the preferred Local Plan and the IIA Report (also referred to as Regulation 19 consultation). The Local Plan and IIA then undergo independent examination; and
- **Stage E:** Monitoring the significant effects of implementing the Local Plan.

Full details on the methodology can be found in **Section 3** of the IIA Report.

## Identification of Sustainability Issues and Opportunities

- 2.2.3 The IIA Scoping Report, outlined key baseline information, identified key sustainability issues in the borough and identified future trends which could occur without implementation of the Local Plan.
- 2.2.4 Following the findings identified at scoping, and updates based on changes in legislation and best practice guidance, an IIA Appraisal Framework has been produced, which was used to guide the assessment process of the plans and strategies.
- 2.2.5 This Appraisal Framework has guided the IIA assessment of the Local Plan and is shown below.
- **IIA1:** To build inclusive communities by reducing social exclusion, promoting equity and equality and respecting diversity.
  - **IIA2:** To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH's residents.
  - **IIA3:** To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.
  - **IIA4:** To ensure that residents have employment opportunities and access to training.
  - **IIA5:** To meet the housing needs of all of the borough's residents inclusively.
  - **IIA6:** To reduce crime and the fear of crime for all residents inclusively.
  - **IIA7:** To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.
  - **IIA8:** To protect and enhance access to essential services and facilities for all residents.

- **IIA9:** To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.
- **IIA10:** To protect and enhance the borough's townscapes and landscapes.
- **IIA11:** To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.
- **IIA12:** To reduce the risk and vulnerability to flooding.
- **IIA13:** To maintain and enhance water quality.
- **IIA14:** To protect and enhance air quality.
- **IIA15:** Ensure that Tower Hamlets is resilient to the effects of climate change.
- **IIA16:** To reduce greenhouse gas emissions, support national and local decarbonisation initiatives and encourage energy efficiency.
- **IIA17:** To reduce the amount of waste produced and minimise the amount sent to landfill.
- **IIA18:** To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.

## 3 IIA Assessment Findings

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### 3.1 Assessment of Policies

- 3.1.1 The assessment of the Local Plan policies was carried out in relation to the IIA Objectives. A summary of the significant effects are detailed in **Table 3-1** below. No significant negative effects were identified.
- 3.1.2 It should be noted that the assessment of policies within themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than their relationship with other policies within the Local Plan.
- 3.1.3 Further details on the assessment of the Local Plan policies can be found within **Section 6** of the main IIA Report and **Appendix F** to the main IIA Report.

**Table 3-1 – Summary of Significant Effects – Policy Assessment**

Significance	Number of Significant Effects	Summary of Effects
<b>Significant Positive (++)</b>	47	<ul style="list-style-type: none"> <li>• Policies that build inclusive communities through the reduction of social exclusion, promotion of equity and equality, and respect diversity (IIA1).</li> <li>• Policies that could increase physical activity, healthy lifestyles or mental wellbeing, improving health (IIA2).</li> <li>• Policies that could increase employment opportunities, diversify the economy and encourage investment (IIA3).</li> <li>• Policies that improve employment opportunities and access to training (IIA4).</li> <li>• Policies that could increase the borough’s housing provision to meet the needs of residents inclusively (IIA5).</li> <li>• Policies that could improve crime rates and reduce the fear of crime for all residents inclusively (IIA6).</li> <li>• Policies that will promote traffic reduction through the promotion of sustainable transport modes and supporting residents to live more locally (IIA7).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Policies that could protect and enhance access to essential services and facilities (IIA8).</li> <li>• Policies that could result in the protection and enhancement of protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain (IIA9).</li> <li>• Policies that could protect and enhance the borough’s townscapes and landscapes (IIA10).</li> <li>• Policies that could protect and improve assets and their setting within the historic environment (IIA11).</li> <li>• Policies that could reduce the risk and vulnerability of flooding (IIA12).</li> <li>• Policies that could maintain and enhance water quality (IIA13).</li> <li>• Policies that could result in reductions in air pollutants, improving air quality (IIA14).</li> <li>• Policies that could improve the borough’s resilience to the effects of climate change (IIA15).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Policies that encourage net zero developments and could reduce carbon emissions and improve energy efficiency (IIA16).</li> <li>• Policies could reduce the amount of waste produced (IIA17).</li> <li>• Policies that ensure the efficient use of land, sustainable use of resources, and seek opportunities to promote a circular economy (IIA18).</li> </ul>
<b>Uncertain (?)</b>	24	<ul style="list-style-type: none"> <li>• Policies that have potential to result in decreases, or increases in car reliance (IIA7).</li> <li>• Policies where development design are unclear and could result in a decrease or increase in biodiversity and natural capital (IIA9).</li> <li>• Policies where visual, setting impacts or disturbance will largely be determined by individual scheme location and design (IIA10).</li> <li>• Policies where the enhancements or negative effects will be determined by scheme level design and location close to heritage assets (IIA11).</li> <li>• Policies where the enhancements or negative effects will be determined by scheme level design and location from areas of high flood risk (IIA12).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Policies where water quality will be determined by the nature and quantity of freight and transport on water.</li> <li>• Policies where measures to reduce GHG emissions and promote renewable energy are unclear. These measures will be determined by scheme level design (IIA16).</li> <li>• Policies where the location and design are unclear and could be resource intensive and generate a significant amount of construction waste (IIA17).</li> <li>• Policies where the location and design are unclear and could result in land take (IIA18).</li> </ul>

### 3.2 Assessment of Site Allocations

3.2.1 The assessment of proposed site allocations was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 3-3** and **Table 3-4** below. The full assessment of proposed site allocations can be found in **Appendix G** to the **main IIA** report.

**Table 3-2 - Summary of Significant Effects – Site Allocations Assessment**

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	126	<ul style="list-style-type: none"> <li>• Sites that contribute to LBTH’s housing target, provide affordable and adaptable homes, and provide new community facilities (IIA1).</li> <li>• Sites that improve housing provision, opportunities, open spaces and healthcare facilities (IIA2).</li> <li>• Sites that are located close to existing town centres and include retail space (IIA3).</li> <li>• Sites that are located close to existing employment areas and provide employment space (IIA4).</li> <li>• Sites where over 500 homes are provided, contributing towards LBTH’s housing target, at least 35% affordable homes, and accessible homes provided (IIA5).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Sites that deliver public realm improvements, increase natural surveillance, and include designing out crime principles (IIA6).</li> <li>• Sites that have good access to sustainable transport, high PTAL scores, and improve cycle and pedestrian access (IIA7).</li> <li>• Sites that have good access to transport, improve accessibility, permeability, and wayfinding (IIA8).</li> <li>• Sites that achieve biodiversity net gain through measures such as landscaping and green roofs (IIA9).</li> <li>• Sites that positively contribute to the townscape, provide open space enhancements, and public realm improvements (IIA10).</li> <li>• Sites located on previously developed land, support high-density housing and provide best use of land (IIA18).</li> </ul>
<b>Uncertain (?)</b>	90	<ul style="list-style-type: none"> <li>• Sites where housing provision, size, type and tenure is currently unknown (IIA1).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Sites where housing, healthcare and community space provisions provided are uncertain (IIA2).</li> <li>• Sites where the inclusion of retail space is currently unclear (IIA3).</li> <li>• Sites where it is unclear if employment space will be included within the development (IIA4).</li> <li>• Sites where housing provision, accessibility, size, type and tenure is unclear (IIA5).</li> <li>• Sites where it is unclear if designing out crime principles will be applied (IIA6).</li> <li>• Sites where it is unclear if additional sustainable transport will be included within development (IIA7).</li> <li>• Sites where it is unclear if construction will adversely affect habitats, or if 10% biodiversity net gain will be achieved (IIA9).</li> <li>• Sites where it is unclear if design will improve landscape and townscape settings (IIA10).</li> <li>• Sites that have potential to result in adverse effects on heritage assets, or improvements to the setting of heritage assets, but design details are unclear (IIA11).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Sites that are located within flood risk areas and it is unclear if mitigation measures will be included within development (IIA12).</li> <li>• Sites that are located close to water bodies but it is unclear if water quality mitigation measures will be included within development (IIA13).</li> <li>• Sites where climate resilience measures are currently unknown (IIA15).</li> <li>• Sites where it is unknown if development will include renewable energy sources or low carbon heat networks (IIA16).</li> <li>• Sites where it is unclear if existing buildings, structures and materials will be reused or recycled (IIA17).</li> <li>• Sites where the density of housing and use of sustainable materials is unknown (IIA18).</li> </ul>
<b>Significant Negative (- -)</b>	13	<ul style="list-style-type: none"> <li>• Sites that result in a loss of heritage assets (IIA11).</li> <li>• Sites that are located within flood zone 3 and a flood risk area, and no mitigation measures are outlined (IIA12).</li> <li>• Sites that have high climate risk and no climate resilience measures (IIA15).</li> </ul>

### 3.3 Assessment of Alternatives

#### Assessment of Alternative Policies

- 3.3.1 The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the preferred plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 3.3.2 The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Local Plan and the application of the London Plan.
- 3.3.3 In general, the continuation of the existing Local Plan and London Plan Policies have resulted in less significant positive effects. However, the policies within each plan do remain relevant and the majority are fit for purpose.
- 3.3.4 The London Plan lacks specific borough details, that the local plan can provide, whilst some of the existing Local Plan policies are outdated, and no longer reflect key issues such as the Covid-19 recovery, rising costs of living and increases in crime against women and girls.

## Assessment of Alternative Site Allocations

**Table 3-3 - Overall impact of all Local Plan site alternatives against IIA Objectives**

Significance	Number of Significant Effects	Summary of Effects
<b>Significant Positive (++)</b>	2	<ul style="list-style-type: none"> <li>• Sites that are well connected to community and healthcare facilities and are likely to include additional facilities and open space (IIA2).</li> <li>• Sites that provide additional employment space and are well located close to existing employment opportunities (IIA4).</li> </ul>
<b>Uncertain (?)</b>	127	<ul style="list-style-type: none"> <li>• Sites where the provision of homes does not meet the borough’s housing target, the size, type, and tenure of homes is unknown (IIA1).</li> <li>• Sites where the additional provision of community facilities and healthcare facilities is unknown (IIA2).</li> <li>• Sites where it is uncertain if retail or business space will be included within development (IIA3).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Sites where it is uncertain if employment space will be provided within development (IIA4).</li> <li>• Sites where housing provision is unclear and fall below LBTH's housing target (IIA5).</li> <li>• Sites where it is unclear if designing out crime principles will be applied (IIA6).</li> <li>• Sites where it is unclear if sustainable transport access or improvements will be included within development (IIA7).</li> <li>• Sites where it is unclear if accessible provision to facilities and services will be included within development (IIA8).</li> <li>• Sites where it is unknown if greenspace will be included, or if 10% biodiversity net gain will be achieved (IIA9).</li> <li>• Sites where design details are unknown and it is uncertain if high quality sustainable design and public realm improvements will be achieved (IIA10).</li> <li>• Sites where it is not clear if sensitive design will be implemented (IIA11).</li> <li>• Sites where flood risk mitigation measures are unknown (IIA12).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Sites where water quality measures are unknown (IIA13).</li> <li>• Sites where climate resilience measures are unknown (IIA15).</li> <li>• Sites where it is unclear if renewable energy or low carbon heat networks will be used (IIA16).</li> <li>• Sites where it is unclear if structures, buildings and materials will be reused or recycled within development (IIA17).</li> <li>• Sites where it is unclear if sites will encourage sustainable use of materials (IIA18).</li> </ul>
<b>Significant Negative (- -)</b>	17	<ul style="list-style-type: none"> <li>• Sites with a low PTAL score (between 0 and 1b) and has no proposed improvements to public transport provision (IIA7).</li> <li>• Sites with a low PTAL score (between 0 and 1b) and has the potential to exclude social groups (IIA8).</li> <li>• Sites that have the potential to result in disturbance or loss of heritage assets (IIA11).</li> <li>• Sites located within flood zone 3 and flood risk areas with no mitigation outlined (IIA12).</li> </ul>

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li>• Sites that have high climate and heat risk and have no climate resilience measures outlined (IIA15).</li> </ul>

## 3.4 Findings from other IIA Assessments

### EqlA

- 3.4.1 Overall, the policies will likely result in positive impacts on protected characteristic group members in the borough. The policies aim to address a wide range of issues, identified by the key themes within the EqlA baseline.
- 3.4.2 The main protected characteristic groups that will particularly benefit include:
- **Age** – A range of ages groups will experience benefits as a result of the proposed policies. Older people who have reduced mobility, suffer from social isolation and loneliness and require access to health and other services will benefit through improved access to services as well as provision of supported living including care homes. Young people seeking education, training and accessible employment opportunities will also experience positive impacts. Young children are likely to benefit from air quality improvements that numerous policies look to achieve;
  - **Disability** – people with a variety of disabilities including mobility issues will benefit from a more accessible public realm, including open spaces, pedestrian routes and key services. The NLP includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations. The NLP ensures that 10% of all new units are wheelchair accessible, improving access to housing; and
  - **Deprivation** – Policies are likely to benefit people from low-incomes who require improved access to employment, education and housing. Policies geared towards the provision of a wide range of employment opportunities at all levels as well as closing the skills gap through upskilling will be useful to low-income groups who are currently positioned as unable to access higher paid jobs. Additionally, the provision of affordable homes and supported living such as homeless shelters will be beneficial to this group. The ambition of the NLP to deliver an affordable housing target would make a positive impact on deprivation, reducing barriers for low-income families to housing and rental markets.
  - **Gender reassignment, sex and gender and race** - people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.

3.4.3 Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:

- **Age, Disability and Pregnancy and maternity** – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups; and
- **Deprivation** – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

3.4.4 The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:

- Religion or belief;
- Sexual orientation; and
- Marriage and civil partnerships.

## HIA

3.4.5 The HIA assessed the NLP policies and considered their impact on health. These have been detailed below:

- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Future policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads.
- **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, increasing road traffic noise in the area. Improvements to the night-time economy could also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction throughout the borough.

- **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for the Future theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the borough. Additional town centre developments is also likely to reduce unemployment in the borough.
- **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access to education and training.
- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces theme include safety measurements.
- **Access to services:** Positive health effects have been identified. Policies under the Community Infrastructure theme support development proposals to maximise opportunities for the provision of high-quality community facilities.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policies. Green infrastructure could be further promoted through additional requirements under the Homes for the Community theme.

- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

## HRA

### Stage 1 - HRA Screening (Regulation 18)

- 3.4.6 There are no Habitats sites within LBTH's administrative area, however there are two Habitats that fall within the identified 7.2km Zone of Influence of the borough boundary and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.
- 3.4.7 A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HFC1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.
- 3.4.8 Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment was considered necessary to satisfy the requirements of the Habitats Regulations as the Local Plan emerges.
- 3.4.9 It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging LBTH Local Plan when considered with other strategic plans based on the findings of the screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.

### Stage 2 - Appropriate Assessment (Regulation 19)

- 3.4.10 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 3.4.11 Policy BO2 was subject to further consultation with the LBTH and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 3.4.12 Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1, the evidence points towards no impact pathway which could give rise to any significant effects

- 3.4.13 Air quality considerations for Lee Valley Special Protection Area (SPA) and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway.
- 3.4.14 Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plans<sup>12</sup>.
- 3.4.15 Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways.
- 3.4.16 Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access.
- 3.4.17 The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 3.4.18 For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified.

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<sup>1</sup> Thames Water, Water Resource Management Plan, 2019 [online] available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

<sup>2</sup> Thames Water, Revised Draft Water Resources Management Plan, 2024 [online] available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources>

## 4 Cumulative Effects

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- 4.1.1 A cumulative effects assessment was undertaken for the IIA. This looked at two different types of cumulative effects – Intra-project and Inter-project. These are defined as follows:
- Consideration of how different proposed policies and sites within the LBTH may interact and cause cumulative effects on a receptor (Intra-project effects); and
  - How the proposed policies and sites within the LBTH could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-Projects Effects)

### 4.2 Intra-Project Effects

- 4.2.1 The proposed policies and sites within the Local Plan resulted in the following intra-project cumulative effects. Further details on the assessment of the inter-project cumulative effects can be found within **Section 9.2** of the main **IIA Report**.
- 4.2.2 Positive effects have largely been identified for IIA objectives where policies contribute to improving the current status of the borough, for example, improving biodiversity enhancements, improving energy efficiency or providing additional community infrastructure. Positive effects were identified for biodiversity, greenhouse gases (GHGs), energy efficiency and sustainable resources, climate resilience, historic environment, landscape and townscape, air quality, efficient use of land, water quality, community needs, inclusivity and equality, health and wellbeing, sustainable transport, economy and employment, crime and safety, and housing.
- 4.2.3 Negative effects have been identified for biodiversity, historic environment, flooding, water quality, GHGs, and waste as a result of the scale of development required to meet the borough's housing targets and requirements for employment generation . There is the potential that multiple developments could result in a cumulative amount of construction waste and emissions of GHGs. Construction of these developments may occur in close proximity to heritage assets and conservation, or increase the risk of flooding due to the cumulative increase in hardstanding surfaces. Additionally, the loss of land required for sites and housing allocation may segregate and damage habitats, resulting in a loss of habitats.

4.2.4 Mixed positive and negative effects were identified for human health, biodiversity and natural capital, landscape and townscape, historic environment, flooding, water quality, air quality, climate change, greenhouse gases, waste, and efficient use of resources.

### 4.3 Inter-Project Effects

4.3.1 An assessment of the potential cumulative effects of the Local Plan in association with other plans, policies and projects in the surrounding area was completed, looking at the potential impacts at a strategic level. Further details on the assessment of the inter-project cumulative effects can be found within **Section 9.3** of the main **IIA Report**.

4.3.2 The following plans were considered:

- The London Plan, 2021;
- Crossrail 2;
- Liverpool Street Station Redevelopment
- 55 Bishopsgate
- One Exchange Square
- Mayor of London, Mayor’s Transport Strategy, 2018;
- Neighbouring Local Plans (detailed within **Section 9.3** of the main **IIA Report**); and
- Neighbouring Local Transport Plans, Strategies and Implementation plans (detailed within **Section 9.3** of the main **IIA Report**).

4.3.3 Potential positive effects were identified for population and equalities, human health, economy and employment, housing, crime and safety, transport, accessibility, air quality, and climate change.

4.3.4 Potential negative effects were identified for landscape and townscape, historic environment, air quality, and waste.

4.3.5 Potential mixed positive and negative effects were identified for population and equalities, human health, biodiversity and natural capital, landscape and townscape, historic environment, flooding, water quality, air quality, climate change, greenhouse gases, waste, and efficient use of resources.

## 5 Mitigation, Enhancements and Monitoring

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### 5.1 Mitigation and Enhancement Measures

- 5.1.1 Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan.
- 5.1.2 Proposed mitigation and enhancement measures have been set out in **Table 5-1** below.

**Table 5-1 -Proposed Mitigation and Enhancement Measures**

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA
IIA1 - Population and Equalities IIA2 - Human Health	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.	Project level design and assessment
IIA1 - Population and Equalities IIA2 - Human Health	The loss of community facilities to make way for site allocations should be avoided. Where a loss can't be mitigated, these should be reprovioned elsewhere.	Project level design and assessment Community engagement
IIA1 - Population and Equalities	Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA4 – Employment and skills	protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).	Council’s Strategic Plan 2022-2026
IIA1 - Population and Equalities IIA2 - Human Health IIA6 – Crime and Safety	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.	Project level Community Safety Assessment, EqIA and HIA
IIA1 - Population and Equalities IIA7 – Sustainable Transport IIA8 - Accessibility	Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.  Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. The council should work with	Inclusion within preferred Local Plan policies  Project level design and assessment and EqIA  Tower Hamlets Transport Strategy 2019-2041

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p> <p>The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.</p>	<p>The Mayor’s Transport Strategy</p>
<p>IIA1 - Population and Equalities</p> <p>IIA2 – Health and Wellbeing</p> <p>IIA6 – Crime and Safety</p>	<p>Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Project level design and assessment</p> <p>Community engagement</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>	
<p>IIA1 - Population and Equalities</p> <p>IIA10 - Landscape and Townscape</p>	<p>Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.</p>	<p>Project level design and assessment</p>
<p>IIA3 – Economy and Town Centres</p>	<p>Where sites are located within or in close proximity to local and neighbourhood shopping centres/ parades it is imperative that development does not detrimentally impact on the vitality of the designated centre.</p>	<p>Project level design and assessment</p> <p>Community engagement</p>
<p>IIA3 – Economy and Town Centres</p>	<p>The loss of businesses should be avoided. Where it cannot be avoided and businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified and/or adequate compensation is provided</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Community engagement</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA4 – Employment and Skills	<p>particularly where businesses may need to be temporarily closed or relocated during construction.</p> <p>Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p>	Project level design and assessment
IIA4 – Employment and skills	Where new development comes forward in close proximity to existing shop frontages and businesses, there’s a need to ensure that they can remain open and maintain their existing business hours.	<p>Inclusion within preferred Local Plan policies</p> <p>Project level design and assessment</p>
IIA6 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn’t currently have its own standalone policy.</p> <p>Given the high levels of crime in some areas of the borough,</p>	<p>Incorporation within the Local Plan policies</p> <p>Project level design and assessment</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	reductions in crime could be better supported by planning policies.	
IIA9 – Biodiversity and Natural Capital	<p>Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on international, national and locally designated sites of importance for biodiversity.</p> <p>A Lighting Strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p>	<p>Project level design and assessment (including noise assessments/ surveys)</p> <p>Lighting Strategy</p>
IIA9 – Biodiversity and Natural Capital	For those sites that incorporate existing green space, Phase 1 habitat surveys should be undertaken to identify any habitats and species.	Project level assessment
IIA10 - Landscape and Townscape	Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.	<p>Scheme level design and planning application</p> <p>London View Management</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>As outlined in the draft Tall Buildings SPD17 Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).</p>	
<p>IIA10 - Landscape and Townscape</p> <p>IIA11 - Historic Environment</p>	<p>New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.</p> <p>Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.</p>	<p>Historic Landscape Characterisation</p> <p>Project level landscape and visual impacts assessments</p> <p>Heritage Impact Assessments</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>Development proposals in designated views should comply with London Plan Policy HC4.</p> <p>Promoters and designers should liaise closely with Tower Hamlets and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity.</p> <p>Where developments are being built and/or improved within, or 500m outside of a designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.</p> <p>Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments.</p>	
IIA10 - Landscape and Townscape	Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes.	Historic Landscape Characterisation

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA11 - Historic Environment		Project level landscape and visual impacts assessments
IIA11 – Historic Environment	<p>Characterisation work should be undertaken to understand the potential impact of site allocations on historic places, and places and inform assessments of an area’s capacity to accommodate development.</p> <p>Site specific studies, such as archaeological desk-based assessment and fieldwork, may also be necessary to provide adequate information.</p>	<p>Historic Landscape Characterisation</p> <p>Archaeological desk based assessment</p>
IIA14: Air Quality	A Dust Management Plan should be compiled prior to demolition and construction of new sites.	Project level Construction Environmental Management Plan (CEMP)

IIA Objective	Mitigation/ Enhancement	Mechanism
<p>IIA15 – Climate Change and Resilience</p> <p>IIA16 – GHG Emissions</p>	<p>Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation.</p> <p>This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation methods, such as solar panels, to reduce the carbon emissions of the site.</p>	<p>Project level design and assessment</p>
<p>IIA12 – Flood Risk</p>	<p>Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken.</p> <p>Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change.</p> <p>This could include features such as sustainable urban drainage</p>	<p>Project specific transport plans/assessments</p> <p>Project active travel plans</p> <p>Incorporation within the Local Plan policies</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	solutions (SuDs), permeable paving and natural engineering such as tree planting.	
IIA12 – Flooding	Flood Risk Assessments should be undertaken for all developments located in Flood Zone 2 or 3. The inclusion of SuDS should be implemented where developments are located in flood zones.	Project level design and assessment
IIA13 – Water Quality IIA18 – Waste	Vessels used to facilitate the movement of waste will need to adhere to the Maritime and Coastguard Agency Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008 and other best practice to minimise pollution and effects on water quality.	Project specific waste management plans Reduce Resue Recycle Waste SPD
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions IIA17 – Waste	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure.	Project level design and assessment

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA18 – Efficient use of resource	Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.	
IIA17 – Waste IIA18 – Efficient use of resource	Proposed sustainable transport infrastructure such as cycle lanes, bus lanes and footpaths, should where appropriate, prioritise the reallocation of the highway network.	Project level design and assessment  Tower Hamlets Transport Strategy 2019-2041
IIA17 – Waste IIA18 – Efficient use of resource	A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).	Project level design and assessment – CEMP and OEMP

## 5.2 Monitoring Measures

- 5.2.1 The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of applying the plan can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.
- 5.2.2 The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:
- IIA1 and IIA2: The effects of a growing population on community facilities and services;
  - IIA5: The number of affordable and adaptable homes delivered;
  - IIA9: The number of new developments achieving biodiversity net gain from January 2024;
  - IIA10: The potential effects on key views;
  - IIA12: Flood risk of new development monitored through the Strategic Flood Risk Assessment;
  - IIA16: Levels of embodied carbon from new development; and
  - IIA18: Levels of waste generations on new developments.
- 5.2.3 It should be noted that these uncertain effects are generally where limited scheme information is currently available.
- 5.2.4 **Table 5-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above. Targets have either been taken from the Local Plan or the London Plan.

**Table 5-2 - Proposed Monitoring Measures**

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
<p>IIA1 and IIA2: The effects of a growing population on community facilities and services</p>	<p>The number of new healthcare and community services provided.</p> <p>Ratio of patient-to-staff numbers at GP practices</p>	<p>No targets included as part of the Local Plan or London Plan</p> <p>The Infrastructure Delivery Plan may include targets. This will be delivered alongside the Local Plan.</p>
<p>IIA5: The number of affordable and adaptable housing provided</p>	<p>The number/ percentage of affordable homes being delivered within the borough.</p> <p>The number/ percentage of adaptable homes or specialist accommodation being delivered within the borough.</p>	<p>Policy HF2 of the Local Plan:</p> <ul style="list-style-type: none"> <li>■ Deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units;</li> <li>■ Deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and</li> <li>■ Deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split.</li> </ul>

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
		Policy D7 of the London Plan: Delivery of at least 10% of dwellings meet Building Regulation requirement M4(3) <sup>3</sup> 'wheelchair user dwellings'
IIA9: The number of new developments achieving biodiversity net gain	The number of new developments achieving biodiversity net gain	Policy BO4 of the Local Plan: To deliver a minimum 2.5 biodiversity unit per hectare increase or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline
IIA10: The potential effects on key views	Number of tall building applications granted planning permission	No targets included as part of the Local Plan or London Plan

<sup>3</sup> HM Government, The Building Regulations, Access to and Use of Buildings (M), 2011 [online] available at: [https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR\\_PDF\\_AD\\_M1\\_2015\\_with\\_2016\\_amendments\\_V3.pdf](https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
IIA11: Potential negative effects from new developments on heritage assets	<p>Number of buildings on the 'At Risk Register'.</p> <p>Number of applications granted planning permission contrary to advice from Historic England.</p>	No targets included as part of the Local Plan or London Plan
IIA12: Flood Risk	Number of Environment Agency objections to planning applications.	No targets included as part of the Local Plan or London Plan
IIA16: Levels of embodied carbon from new development.	The number of development proposals that meet London's Energy Transformation Initiative (LETI) 2020 best practice embodied carbon emission targets	<p>Policy CG4 of the Local Plan:</p> <ul style="list-style-type: none"> <li>■ Domestic buildings should achieve embodied carbon limits of 500kg CO2/m2 or less; and</li> <li>■ Non-domestic buildings should achieve embodied carbon limits of 600kg CO2/m2 or less.</li> </ul>

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
<p>IIA18: Uncertain effects of waste generations on new developments</p>	<p>The amount of construction and demolition waste going to landfill</p> <p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the borough</p>	<p>As per Policy SI7 of the London Plan:</p> <ul style="list-style-type: none"> <li>■ Zero biodegradable or recyclable waste to landfill by 2026</li> <li>■ Meet or exceed the municipal waste recycling target of 65% by 2030</li> <li>■ Meet or exceed the targets for each of the following waste and material streams:               <ul style="list-style-type: none"> <li>• a) construction and demolition – 95% reuse/ recycling/ recovery</li> <li>• b) excavation of material – 95% beneficial use</li> </ul> </li> </ul>

## 6 Next Steps

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- 6.1.1 LBTH is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 6.1.2 This IIA Interim Report will be issued to consultees for consultation alongside the preferred Local Plan (Regulation 19 Consultation) in summer 2024.
- 6.1.3 An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 6-1** below.

**Table 6-1 – Indicative Local Plan and IIA Timetable**

IIA/ Local Plan Stages	Timescales
SA Report (IIA Stage C)	Spring/Summer 2024
Regulation 19 Consultation (IIA Stage D)	Summer 2024
Examination (IIA Stage D)	Early 2025
IIA Post Adoption Statement (Stage E)	Autumn/Winter 2025



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Tower Hamlets Borough Council

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# **New Local Plan**

Integrated Impact Assessment Report



Tower Hamlets Borough Council

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## **New Local Plan**

### **Integrated Impact Assessment Report**

**Type of document (version) Public**

**Project no. 70103752**

**Our Ref. No. 001**

**Date: June 2024**

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# Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft for LBTH	Final for Regulation 18	Draft for Regulation 19	
Date	September 2023	October 2023	June 2024	
Prepared by	Emily Astins Charlotte Town	Emily Astins Charlotte Town	Charlotte Town Jasmine Humphrey	
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Project number	70103752			

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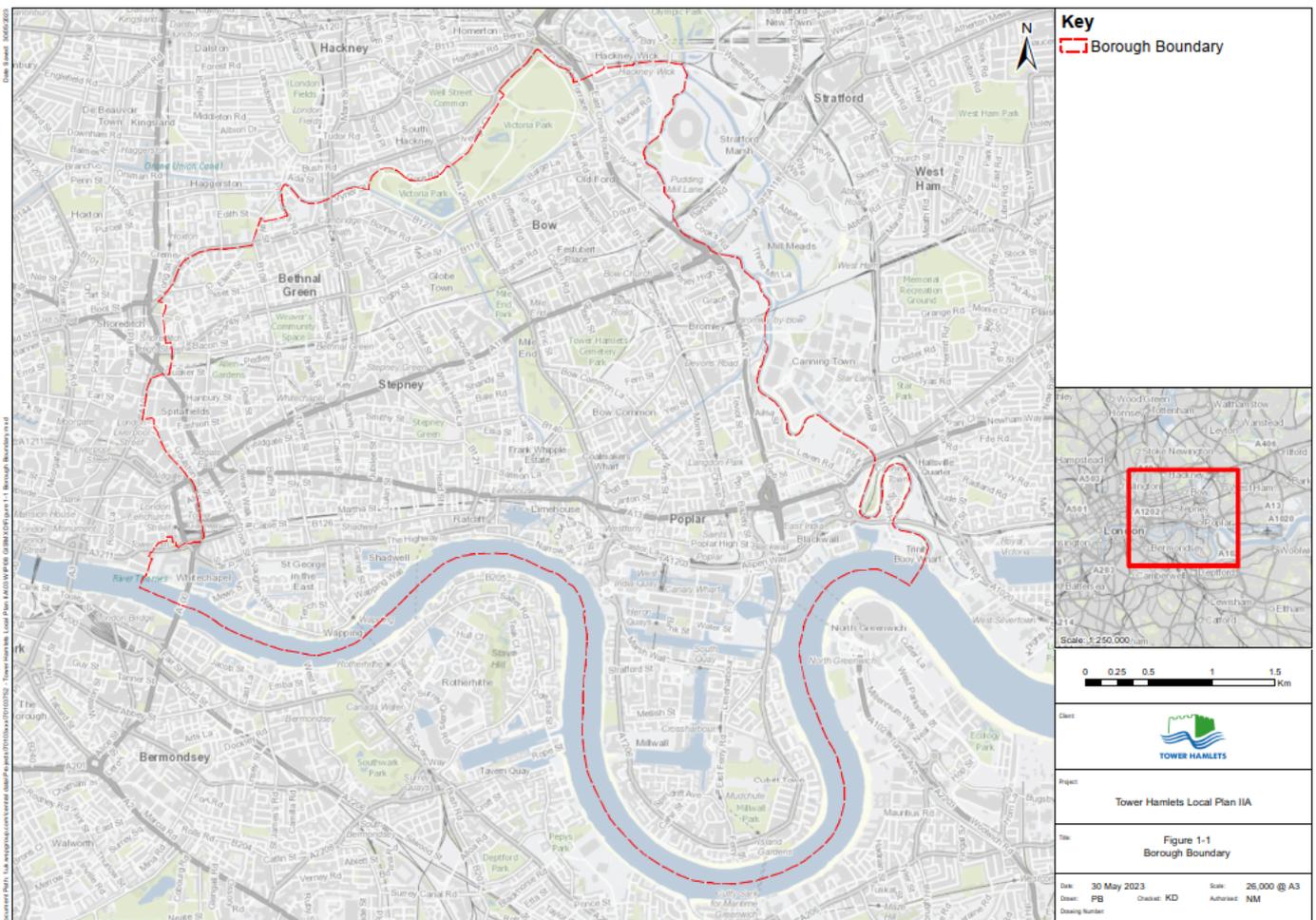
## Health Impact Assessment

# 1 Introduction

## 1.1 Overview

- 1.1.1. The London Borough of Tower Hamlets (here in referred to as LBTH) is in the process of preparing a new Local Plan for the borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2038.
- 1.1.2. It will set out how the borough can sustainably develop, identifying the number of new homes, jobs and facilities needed to support the growing and changing population, as well as protecting all the features that the borough’s communities cherish, such as town centres, parks and open spaces, waterways, cultural and historic buildings.
- 1.1.3. The borough boundary and the spatial extent of the new Local Plan is set out in **Figure 1-1** below.

**Figure 1-1 - LBTH Borough Boundary**



## 1.2 Local Plans

- 1.2.1. Section 3 of the National Planning Policy Framework (NPPF)<sup>1</sup> requires that each local planning authority should prepare a local plan for its area, which guides decisions on future development proposals and addresses the needs and opportunities of the area.
- 1.2.2. Topics that local plans usually cover include housing, employment and shops and they also identify where development should take place and areas where development should be restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.
- 1.2.3. Paragraph 15 of the NPPF states that the *'planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities'*.
- 1.2.4. Part 2 of the Town and Country Planning Regulations 2012 makes provision in relation to the local plan and supplementary planning documents. Parts 4 and 5 of these regulations prescribe the form and content of local plans and supplementary planning documents (to be prepared by local planning authorities) and prescribes which documents are to be local plans.
- 1.2.5. The Local Plan must also be in 'general conformity' with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG). The Mayor of London produces other strategies to sit alongside the London Plan<sup>2</sup>.

## 1.3 Purpose of this Report

- 1.3.1. LBTH has commissioned WSP to undertake an Integrated Impact Assessment (IIA) which will ensure that sustainability aspects are incorporated into their Local Plan. The IIA combines the following assessment processes:
  - Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment - SEA);
  - Equalities Impact Assessment (EqIA);
  - Health Impact Assessment (HIA); and
  - Habitats Regulations Assessment (HRA).
- 1.3.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified, avoiding the need to undertake and report on separate assessments and seeking to reduce any duplication of assessment work. A single process can improve efficiencies in

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<sup>1</sup> Ministry of Housing, Communities and Local Government Framework, National Planning Policy Framework, 2021 [online] available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> Mayor of London, The London Plan, 2021 [online] available at: <https://www.london.gov.uk/programmes-strategies/planning/london-plan>

the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

1.3.3. More detail on the IIA methodology is provided in **Section 3**.

1.3.4. This report sets out the second stage of the IIA/ local planning process, which is the assessment of the preferred Local Plan and preparation of the IIA Report (IIA Stage C). This stage includes the following:

- Assessment of preferred policies, objectives and spatial options;
- Assessment of reasonable alternatives;
- Assessment of cumulative effects;
- Outlining mitigation and enhancement measures;
- Outlining recommendations; and
- Setting out next steps.

## 2 The New Local Plan

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### 2.1 Background

- 2.1.1. The new Local Plan will set out the vision for the future of the borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.
- 2.1.2. Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the borough will develop through to 2038.

### 2.2 Work to Date

- 2.2.1. Work on the new Local Plan started in early 2022. Public consultation has already taken place to develop LBTH's new Local Plan.
- 2.2.2. Early engagement took place from Wednesday 25<sup>th</sup> January 2023 to Wednesday 8<sup>th</sup> March 2023 through the Early Engagement Platform, to seek the views of LBTH's varied communities and stakeholders about the future of the borough and what the local plan should contain. This was an important stage to ensure the local plan is shaped by early and effective engagement with a wide range of groups.
- 2.2.3. The public also had the option of attending one of the three online webinar sessions, an in-person public engagement session, in-person or virtual drop-in sessions, or by providing written comments by email and/or post. This early engagement is the start of the discussion which will support the production of the new Local Plan. The public's input is a valuable part of the preparation process and will inform the development of new policies.
- 2.2.4. Feedback from both public consultations has been used to shape this draft new Local Plan. It sets out a shared vision for the future of the borough and includes the proposed strategy and planning policies that will help guide and manage development in the area over the new Local Plan period (2023 to 2038).
- 2.2.5. The IIA Scoping Report was undertaken in April 2023, which set out the baseline and identified key issues and opportunities for the borough and the Local Plan. This underwent a separate consultation with the statutory consultees (Environment Agency, Historic England and Natural England) in which feedback was received on both the IIA process and the Local Plan.
- 2.2.6. LBTH consulted on the first draft version of the local plan, which was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning)

(England) Regulations 2012<sup>3</sup>, and ran between the 6th of November and the 18th of December 2023. An Interim Integrated Impact Assessment was undertaken in support of this and was consulted on alongside the first draft version of the local plan.

2.2.7. Since consultation, the Local Plan has been revised and refined and this Report represents the assessment of the updated Preferred Local Plan for Regulation 19 consultation.

The indicative timeline for delivery of the Local Plan is shown in **Figure 2-1** below.

**Figure 2-1 - Local Plan Timeline**



<sup>3</sup> UK Government, The Town and Country Planning (Local Planning) (England) Regulations 2012, [online] available at: [https://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi\\_20120767\\_en.pdf](https://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf)

## 2.3 Local Plan Vision and Objectives

2.3.1. The proposed vision for LBTH is set out in **Box 2.1** below.

### Box 2-1 – Local Plan Vision

#### Our Proposed Vision for Tower Hamlets

Our vision for Tower Hamlets is to build a brighter future, to empower the next generation, and to promote a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. The council will prioritise inclusivity for people of all ethnicities, faiths, genders and sexual orientation, walks of life, designing our places to ensure that people are put first within the highest quality environments that meet the needs and ambitions of all our communities.

The council will strive to address overcrowding in the borough and meet the range of housing needs of our community by delivering a significant amount of high-quality new homes. The issues caused by overcrowding including poorer health and educational outcomes, increased impacts on mental health and greater incidences of depression and anxiety will be mitigated with the focus on an increased capacity for housing. We will consider a mix of housing products, types, tenures, layout, and size to best match the borough's population, with a focus on affordable and social housing, particularly family homes that can meet the needs of our overcrowded residents. We will seek to focus on the delivery of affordable and social housing through a 40% target on development sites to tackle the overcrowding and housing crisis.

Tower Hamlets will work towards a clean and green future where carbon emissions and overall energy usage are reduced. We will prioritise the reuse and adaptation of buildings and where not feasible, the recycling of building materials. We will support walking and cycling links alongside the use of, and improvements to, the public transport network. The transport needs of all residents will be considered as part of future development opportunities, particularly where this supports mobility needs or for the purposes of employment. The borough's network of green and blue spaces, including Victoria Park, Mile End Park, Mudchute Park, the Thames, River Lea, Dock Basins, and canals, will provide opportunities for leisure, relaxation, and entertainment with a variety of uses encouraged to support health and well-being while still ensuring their enjoyment and function as open spaces is retained.

The borough, having regained the planning powers for parts of Bromley-by-Bow, Fish Island, and Hackney Wick from the London Legacy Development Corporation (LLDC)<sup>4</sup>, will continue to integrate and grow the distinctive opportunities these areas offer.

<sup>4</sup> The LLDC came into being on April 1, 2012. From October 1 2012 the LLDC became the Local Planning Authority for the Olympic Park and surrounding neighbourhoods, which includes Bromley-by-Bow and Fish Island. The LLDC functions and responsibilities include those related to plan making and decision making.

The borough's small businesses, start-ups, and markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Crisp Street Market, Brick Lane Market, and other local traders will be prioritised and at the heart of decision-making. The key employment areas of Canary Wharf, Whitechapel, and the City Fringe will continue to evolve into dynamic centres of innovation and global hubs for the financial, technology, professional, life-sciences, biotech, and digital sectors. The continued benefits of the Elizabeth line arrival will further unlock the unique opportunities available within the borough. A community wealth building approach will be adopted, alongside the provision of genuinely affordable workspace will be prioritised for local small businesses, local start-ups, makers, the creative industries, and emerging and thriving small and medium-sized enterprises.

We will identify and coordinate the provision of infrastructure necessary to support our growing population, including promoting the delivery of new parks, public transport improvements, educational, health, community, cultural, and recreational facilities across the borough.

Our unique town centres, markets, historical, and cultural attractions will be revitalised to support local communities and become some of London's top attractions. With the borough's growing population, young people will be at the forefront of anticipated regeneration with jobs, homes, spaces, and environments geared towards their success.

Exceptional design and architectural innovation will be ensured across the borough to ensure our distinct buildings, skylines, and streetscapes provide a high-quality environment for our residents and remain a recognisable feature of London. We will celebrate the vibrant history and urban landscape of Tower Hamlets through thoughtful design and placemaking, highlighting our rich, historic, and significant character areas. Tower Hamlets will emerge from the economic impacts of the COVID-19 pandemic and Brexit to maintain its status as an international hub for business, culture, and tourism. Our unique location, with strong links to the City of London, Stratford, London City Airport, and beyond, will allow for a rich mix of strategic functions that benefit the community.

By 2038, Tower Hamlets will have made significant strides in addressing overcrowding, delivered thousands of new homes to support the community, provided opportunity for markets and small local businesses to thrive, and improved the overall health and safety of residents. The borough will have continued to play a role in supporting London's growth and economy through sustainable development. The borough's strong and inclusive communities will be thriving within healthy environments, ensuring a brighter future for all.

2.3.2. The Local Plan’s strategic objectives provide a link to the delivery of the vision for Tower Hamlets. These objectives address the key challenges of the borough over the 15-year plan period. The objectives have been informed by and reflect many of the key documents prepared by the council, including the Strategic Plan (2022-2026)<sup>5</sup>. These objectives are as follows:

- Empowering our communities culturally, economically, and politically
- Tackling overcrowding and housing in our borough
- Supporting young people and accelerating education
- A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities
- Securing infrastructure delivery to protect and strengthen public services
- A clean and green future
- Healthy, safe and inclusive neighbourhoods

## 2.4 Local Plan Policies

2.4.1. In total the draft Local Plan puts forward 72 policies across 10 themes. These themes and policies have been outlined in **Table 2-1** below. Strategic policies have been denoted by an asterisk. These are the policies which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004<sup>6</sup>.

**Table 2-1 – Proposed Draft Local Plan Policies**

<b>Draft Local Plan Policies</b>
<b><i>Delivering the Local Plan</i></b>
DV1 - Areas of growth and opportunity within Tower Hamlets
DV2 - Delivering sustainable growth in Tower Hamlets
DV3 – Healthy Environments
DV4 - Planning and construction of new development

<sup>5</sup> The Strategic Plan is the council’s main plan. It sets out the most important priorities for the council between 2022 and 2026. These priorities are translated from the Mayor’s vision and the administration’s manifesto. All local authorities must deliver certain services and make decisions: these are set out in law. The plan also includes important actions that the council will take to make sure these services and decisions are the best they can be.

<sup>6</sup> UK Government, Planning and Compulsory Purchase Act 2004 [online] available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents>

<b>Draft Local Plan Policies</b>
DV5 - Developer contributions
DV6 – Social value
DV7 – Utilities and digital connectivity
DV8 – Site allocations
<b><i>Homes for the Community</i></b>
HF1 – Meeting housing needs
HF2 – Affordable housing and housing mix
HF3 – Protection of existing housing
HF4 – Support and specialist housing
HF5 – Gypsy and traveller accommodation
HF6 – Purpose-built student accommodation
HF7 – Large-scale purpose-built shared living
HF8 – Housing with shared facilities (houses in multiple occupation)
HF9 – Housing Standards and Quality
<b><i>Clean and Green Future</i></b>
CG1 – Mitigating and adapting to a changing climate
CG2 – Low energy buildings
CG3 – Low carbon energy and heating
CG4 – Embodied carbon, retrofit and the circular economy

<b>Draft Local Plan Policies</b>
CG5 – Overheating
CG6 – Managing flood risk
CG7 – Sustainable drainage
CG8 – Water efficient design
CG9 – Air quality
CG10 – Noise and vibration
CG11 – Contaminated land
<b><i>People Places and Spaces</i></b>
PS1 – Design and infrastructure-led approach to development
PS2 – Tall Buildings
PS3 – Securing design quality
PS4 – Attractive streets, spaces and public realm
PS5 – Creating inclusive spaces
PS6 – Heritage and the historic environment
PS7 – World heritage sites
PS8 – Shaping and managing views
PS9 – Shopfronts
PS10 – Advertisements, hoardings and signage
PS11 – Siting and design of telecommunications infrastructure

<b>Draft Local Plan Policies</b>
<b><i>Inclusive Economy and Good Growth</i></b>
EG1 – Creating investment and jobs
EG2 – New employment space
EG3 – Affordable workspace
EG4 – Loss and redevelopment of employment space
EG5 – Railway Arches
EG6 – Data Centres
<b><i>Town Centres</i></b>
TC1 – Supporting the network and hierarchy of centres
TC2 – Protecting the diversity, vitality and viability of town centres
TC3 – Town centre uses outside centres
TC4 - Markets
TC5 – Food and drink
TC6 – Entertainment uses
TC7 – Evening and night-time economy
TC8 – Short-stay accommodation
<b><i>Community Infrastructure</i></b>
CI1 – Support community facilities
CI2 – Existing community facilities

<b>Draft Local Plan Policies</b>
CI3 – New and enhanced community facilities
CI4 – Public houses
CI5 – Arts and Culture facilities
<b><i>Biodiversity and open space</i></b>
BO1 – Green and blue infrastructure
BO2 – Open spaces and the Green Grid networks
BO3 – Water spaces
BO4 – Biodiversity and access to nature
BO5 – Urban greening
BO6 – Play and recreation spaces
BO7 – Food growing
<b><i>Movement and Connectivity</i></b>
MC1 – Sustainable travel
MC2 – Active travel and healthy streets
MC3 – Impacts on the transport network
MC4 – Parking and permit-free
MC5 – Sustainable delivery, servicing and construction
<b><i>Reuse, Recycling and Waste</i></b>
RW1 – Managing our waste

Draft Local Plan Policies
RW2 – New and enhanced waste facilities
RW3 – Waste collection facilities in new development

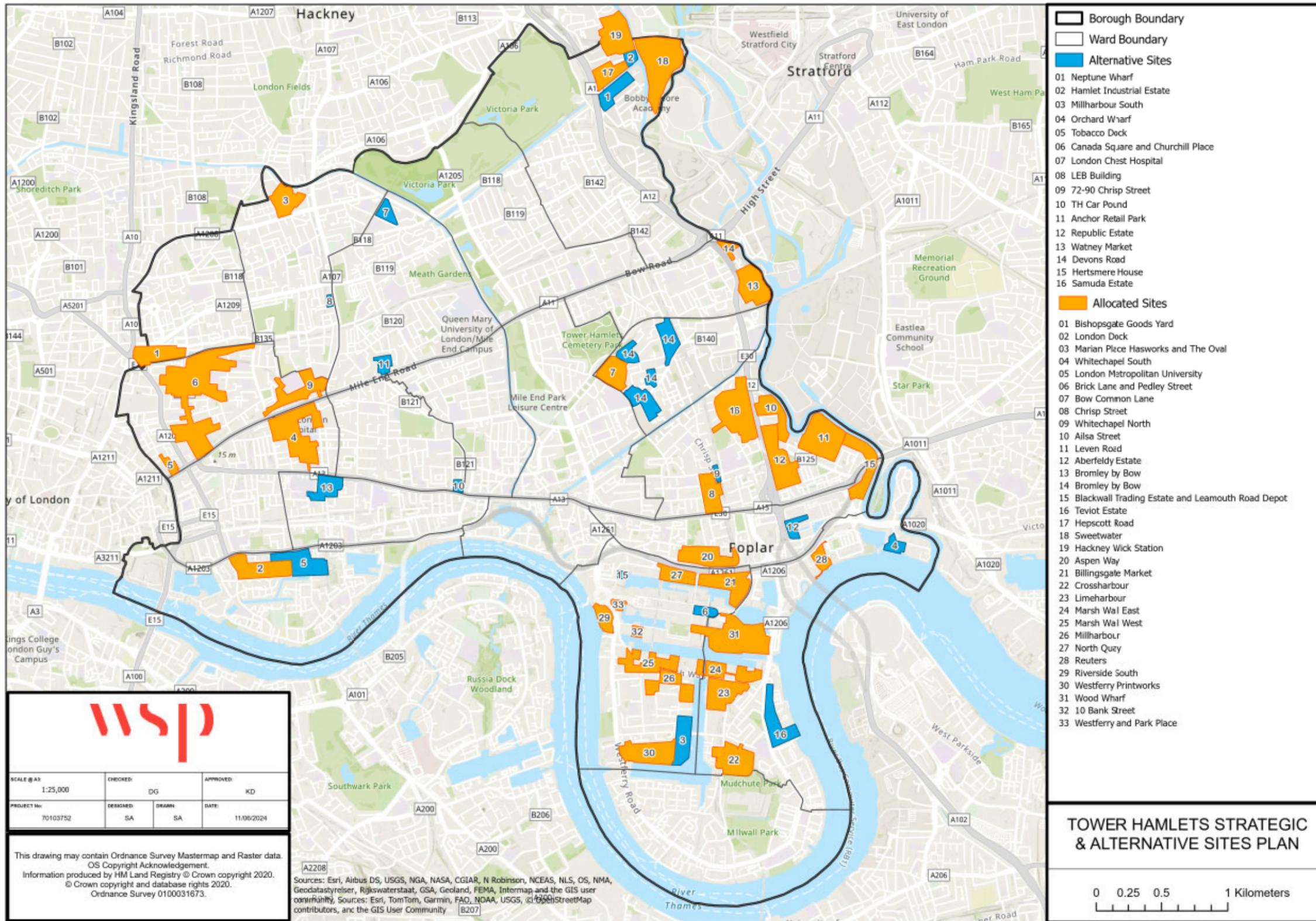
## 2.5 Local Plan Site Allocations and Alternatives

- 2.5.1. A key part of the local planning process is to identify key sites for development. The Local Plan proposes 32 site allocations, which are set out in **Figure 2-2** overleaf.
- 2.5.2. All proposed development sites underwent an initial sifting process by LBTH which identified potential key constraints as well as its ability to achieve a minimum of 500 new homes. Sites include those that have been previously allocated as part of the existing local plan and the LLDC Local Plan<sup>7</sup> as well as those that have come forward since the adoption of these plans.
- 2.5.3. It should be noted that some of the proposed site allocations may be subject to further viability testing, but it is assumed that they will be able to achieve a minimum of 500 new homes.
- 2.5.4. As part of the SEA Regulations, reasonable alternatives need to be considered. The proposed site alternatives include those sites that are developable but do not meet the 500 minimum capacity targets of the proposed site allocations. There are 16 sites in total. These sites have the potential to come forward as windfall sites in the future if the proposed site allocations above do not provide adequate housing numbers.

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<sup>7</sup> LLDC Local Plan 2020-2036 [online] available at: <https://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-2020-2036>

Figure 2-2 - Proposed Site Allocations and Alternatives



### 3 Methodology

#### 3.1 Introduction

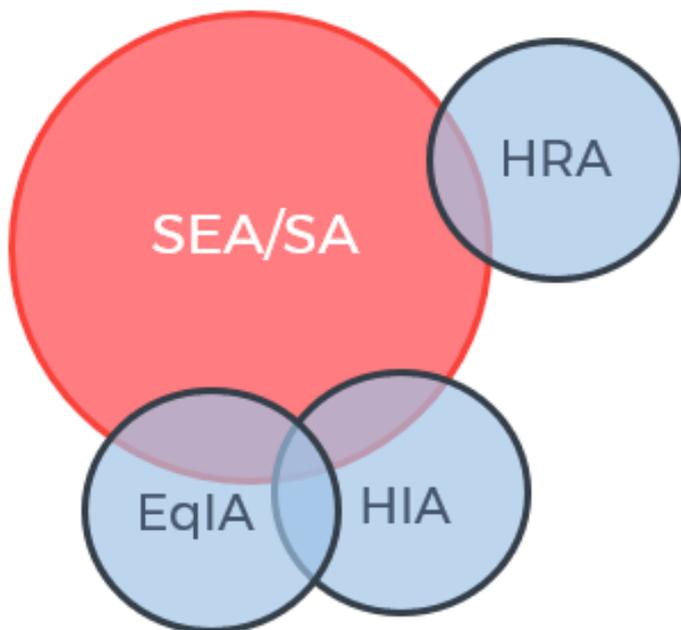
3.1.1. Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

3.1.2. The IIA combines the following assessment processes:

- Strategic Environmental Assessment (SEA);
- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

3.1.3. **Figure 3-1** below shows the relationship of each of these IIA elements.

**Figure 3-1 - Relationship of IIA Elements**



## 3.2 Sustainability Appraisal

- 3.2.1. The SEA/SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- 3.2.2. SEA is used to describe the application of environmental assessment to plans and programmes in accordance with the 'Environmental Assessment of Plans and Programmes Regulations' (SI 2004/1633, known as the SEA Regulations)<sup>8</sup>.
- 3.2.3. SEA is mandatory for plans and programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste or water management, telecommunications, tourism, town and country planning or land use, and which set the framework for future development consent of projects listed in the Town and Country Planning (Environmental Impact Assessment) Regulations<sup>9</sup>.
- 3.2.4. SEA only considers the environmental effects of a plan whilst SA also considers a plan's wider economic and social effects. It is obligatory that SAs meet all of the requirements of the SEA Regulations.
- 3.2.5. The approach adopted for the SA element of the Local Plan follows that set out in the Practical Guide to SEA<sup>10</sup> and the Planning Practice Guidance to SEA<sup>11</sup>. SAs do however need to meet all of the requirements of the SEA Regulations, so a separate strategic environmental assessment should not be required.

## 3.3 Equalities Impact Assessment

- 3.3.1. The Equality Act 2010<sup>12</sup> includes a public-sector equality duty that requires public organisations and those delivering public functions to: *'show due regard to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations between communities'*.
- 3.3.2. The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be

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<sup>8</sup> SI 2004 No. 1633, The Environmental Assessment of Plans and Programmes Regulations 2004 [online] Available at: [http://www.legislation.gov.uk/ukksi/2004/1633/pdfs/ukxi\\_20041633\\_en.pdf](http://www.legislation.gov.uk/ukksi/2004/1633/pdfs/ukxi_20041633_en.pdf)

<sup>9</sup> The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [online] Available at: <http://www.legislation.gov.uk/ukksi/2017/571/introduction/made>

<sup>10</sup> Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive. available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>11</sup> Department for Communities and Local Government (2015) Strategic environmental assessment and sustainability appraisal. Available at: <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>12</sup> Equality Act, 2010, [online] available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents>

improved or promoted. The Equality Duty came into force in April 2011 and covers the following nine Personal Protected Characteristics:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief; and
- Sexual orientation.

### 3.4 Health Impact Assessment

- 3.4.1. HIA is a process to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level. Assessment of health can be undertaken as a discrete process within an HIA and can also be embedded within environmental assessments.
- 3.4.2. HIA is not a statutory requirement of the Local Plan preparation process. However, Planning Practice Guidance<sup>13</sup> states that ‘Local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making’.
- 3.4.3. HIAs can be done at any stage in the development process but are best done at the earliest stage possible.

### 3.5 Habitat Regulations Assessment

- 3.5.1. Under Article 6(3) of the European Union Habitats Directive<sup>14</sup> as transposed into the UK law by the Habitats Regulations<sup>15</sup>, an assessment (referred to as an HRA) needs to be undertaken in respect of any plan or project which:

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<sup>13</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, Planning Practice Guidance, Healthy and Safe Communities, 2014 [online] available at: <https://www.gov.uk/guidance/health-and-wellbeing>

<sup>14</sup> European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, 1992 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701>

<sup>15</sup> The Conservation of Habitats and Species Regulations 2017, [online] Available at: <http://www.legislation.gov.uk/ukSI/2017/1012/contents/made>

- 3.5.2. “Either alone or in combination with other plans or projects would be likely to have a significant effect on a site designated within the Natura 2000 network – these are Special Areas of Conservation (SACs), candidate SACs (cSACs), and Special Protection Areas (SPAs). In addition, Ramsar sites (wetlands of international importance), potential SPAs (pSPA) and in England possible SACs (pSACs), are considered in this process as a matter of law or UK Government policy. These sites are collectively termed ‘European sites’ in Habitats Regulations Assessment (HRA); and is not directly connected with, or necessary to, the management of the site”.
- 3.5.3. Guidance on the Habitats Directive sets out four distinct stages for assessment under the Directive:
- Stage 1: Screening: the process which initially identifies the likely impacts upon a Natura 2000 site of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant (undertaken at Regulation 18);
  - Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects, with respect to the site’s conservation objectives and its structure and function. This is to determine whether there will be adverse effects on the integrity of the site (undertaken at this stage - Regulation 19 );
  - Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site ; and
  - Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the Natura 2000 network.
- 3.5.4. The first stage of the HRA (screening) was undertaken alongside the IIA Interim Report, to support Regulation 18 consultation. As the screening was unable to rule out LSE, Stage 2 (Appropriate Assessment) has been undertaken to support Regulation 19. This IIA Report outlines the key findings from this assessment.
- 3.5.5. The HRA is driven by separate legislation to the SEA/SA and other forms of assessment. This means the HRA Report will be published separately to the IIA Report and not included as an appendix to the IIA Report.

## 3.6 IIA Process and Requirements

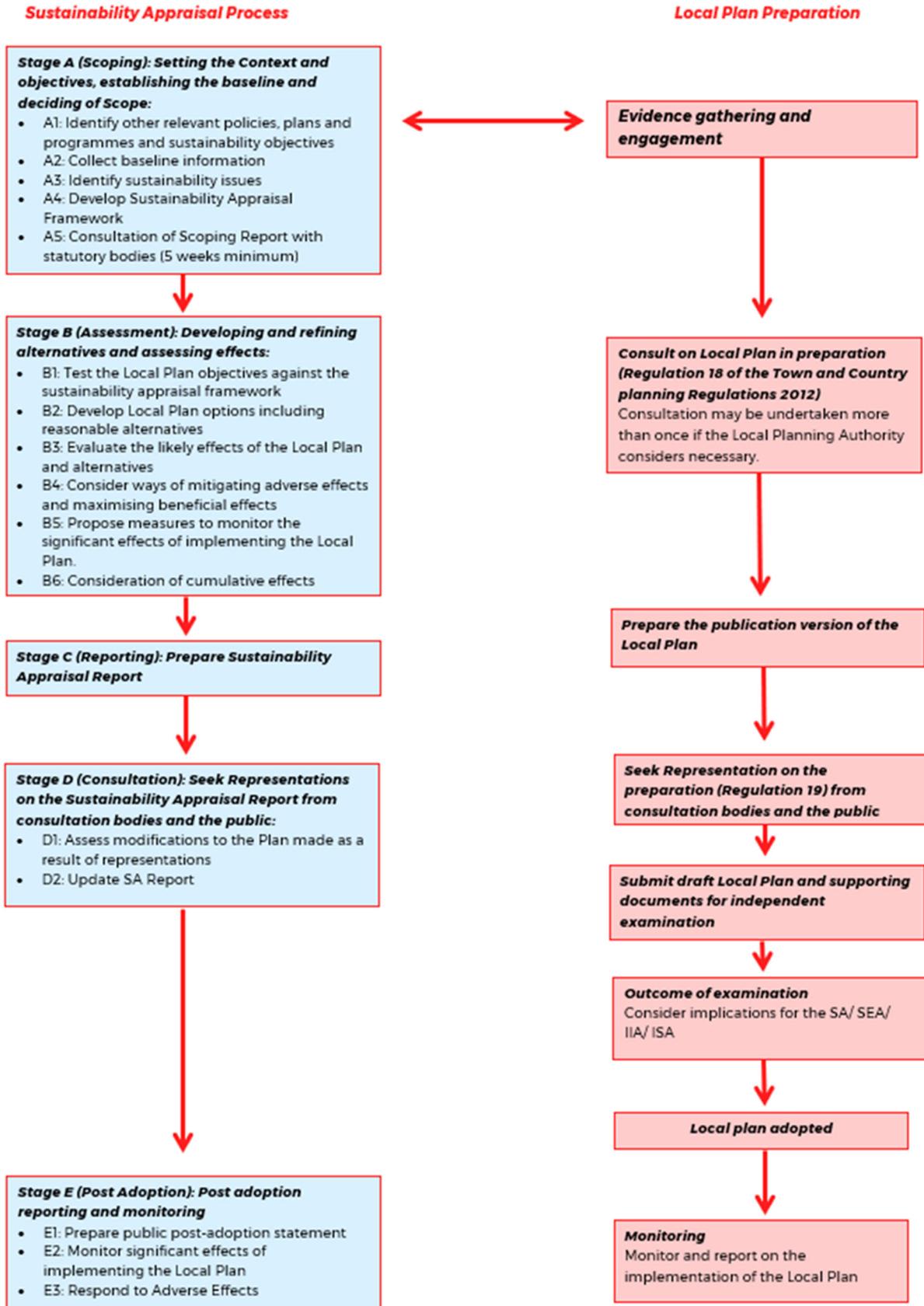
- 3.6.1. **Table 3-1** below sets out the IIA process. The integration of the IIA with the Local Plan process is shown in **Figure 3-1**. This Report represents Stage 2 of the Local Plan and IIA Stage B. **Appendix A** sets out more specifically how the IIA has met the requirements of the SEA Regulations.

### Table 3-1 – IIA Stages

Local Plan Stage	IIA Stage and Tasks
<p><b>Stage 1: Evidence Gathering and Engagement</b></p>	<p><b>Stage A: <i>Setting the context and objectives, establishing the baseline and deciding on the scope – Completed in 2023</i></b></p> <p>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>A2: Collecting baseline information</p> <p>A3: Identifying sustainability issues and problems</p> <p>A4: Developing the IIA assessment framework</p> <p>A5: Consulting on the scope of the IIA</p>
<p><b>Stage 2: Draft Plan Preparation and Regulation 18 Consultation</b></p>	<p><b>Stage B: <i>Developing and refining options/alternatives and assessing effects</i></b></p> <p>B1: Testing the draft plan objectives against the IIA assessment framework</p> <p>B2: Developing the draft Local Plan options and preparing an IIA Report (this report)</p> <p>B3: Predicting the effects of the draft Local Plan and its alternatives</p> <p>B4: Evaluating the effects of the draft Local Plan and its alternatives</p> <p>B5: HIA and EqIA assessments</p> <p>B6: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B7: Proposing measures to monitor significant effects of implementing local plans</p> <p>B8: Consultation of Interim IIA Report to accompany the Regulation 18 consultation</p>
<p><b>Stage 3: Preparation of the publication version of the Plan</b></p>	<p><b>Stage C: <i>Prepare the Integrated Sustainability Appraisal Report – This Report</i></b></p> <p>C1: Testing the final objectives against the IIA framework</p> <p>C2: Predicting the effects of the final Local Plan and its alternatives</p> <p>C4: Evaluating the effects of the final Local Plan and its alternatives</p> <p>C5: Updated HIA and EqIA assessments</p> <p>C6: Development of mitigation and enhancement measures</p> <p>C7: Further development of monitoring measures</p> <p>C8: Consultation of IIA Report to accompany the Regulation 19 consultation</p>

Local Plan Stage	IIA Stage and Tasks
<b>Stage 4: Seek representation on the publication Plan (Regulation 19) from consultation bodies and the public</b>	<p><b><i>Stage D: Consulting on the preferred options of the Local Plan and IIA Report – This stage</i></b></p> <p>D1: Public participation on the preferred options of the Local Plan and the IIA Report</p> <p>D2 (i): Appraising any significant changes from consultation</p>
<b>Stage 5: Independent Examination</b>	<p><b><i>Stage D: Consulting on the preferred options of the Local Plan and IIA Report</i></b></p> <p>D2 (ii): Appraising any significant changes from representations</p> <p>D3: Preparation of an IIA Statement</p>
<b>Stage 6: Adoption and monitoring</b>	<p><b><i>Stage E: Monitoring the significant effects of implementing the Local Plan</i></b></p> <p>E1: Finalising aims and methods for monitoring</p> <p>E2: Responding to adverse effects</p>

Figure 3-2 - Local Planning Process Vs SA Process



## 3.7 IIA Report Methodology

- 3.7.1. Stage C (this report) comprises the assessment of the preferred Local Plan, against the IIA Appraisal Framework objectives identified within the Scoping Report. This follows on from the previous assessment undertaken at for the Regulation 18 Interim IIA Report.
- 3.7.2. As per the SEA regulations, the IIA also needs to consider and compare all reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the borough. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan.
- 3.7.3. There are not currently any alternative policies, therefore, the IIA has continued to assess two different scenarios – the continuation of the existing Local Plan and the application of the London Plan<sup>16</sup>. There are proposed alternative sites, which have been assessed alongside the proposed allocations.
- 3.7.4. This IIA Report will therefore cover the assessment of:
- Compatibility assessment of the Visions and Strategic Objectives;
  - Local Plan preferred policies;
  - Alternative policy scenarios;
  - Site allocations; and
  - Site alternatives.

### Compatibility Assessment

- 3.7.5. Testing the compatibility of the preferred Local Plan's Strategic Policies and Objectives against the IIA Appraisal Framework help to identify both potential synergies and inconsistencies. This information can help in developing and refining the objectives of the Local Plan.

See **Section 5** for further details.

### Assessment of Effects

- 3.7.6. The assessment of policies, sites and alternatives has considered the following:
- Overall effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible)
  - Nature of effect (direct, indirect)
  - Spatial Extent (local, regional, national)

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<sup>16</sup> Mayor of London, The London Plan, 2021 [online] available at:  
[https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

- Reversibility of effect:
  - Reversible: The receptor can return to baseline condition without significant intervention
  - Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term) – Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

3.7.7. **Table 3-2** sets out the key to the assessment, whilst the detailed Assessment criteria is set out in **Appendix B**.

**Table 3-2 – Key to Assessment**

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local – borough wide / regional – Greater London / national - England)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

- 3.7.8. It should be noted that where uncertain and negligible effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. In this instance, these cells have been left blank.

### **Assessment of Policies**

- 3.7.9. The assessment of policies has been undertaken by themes which have been assessed together. The assessment of policies within themes and sub-themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than the draft Local Plan as a whole.

### **Policy Alternatives**

- 3.7.10. The assessment of policy alternatives will assess two scenarios – the continuation of the existing Local Plan and the application of just the London Plan. The assessment would not assess individual policies within these documents but will look at the application as a whole.
- 3.7.11. A high level summary of effects on each of the IIA objectives will be provided and each will be scored using the Key to Assessment set out in **Table 3-2** above. See **Section 6** for further details.

### **Assessment of Sites**

- 3.7.12. An initial red, amber, green (RAG) assessment for both the site allocations and alternative sites was undertaken using spatial indicators for each of the IIA Appraisal Framework objectives.
- 3.7.13. Relevant data on spatial environmental, social and economic indicators, as well as those specifically relevant to health and equalities, have been loaded onto an online WebGIS platform, which has facilitated the site assessments.
- 3.7.14. Spatial calculations were undertaken following the RAG criteria (as set out in **Appendix B**). This has allowed a quick build-up of a RAG assessment of sites and build an overview matrix of the assessment and the performance against the spatial indicators.
- 3.7.15. It should be noted that the RAG assessment simply highlights the potential sensitivity of different indicators, it doesn't necessarily mean that the indicators are good or bad. For instance, an area of overall deprivation could be more highly sensitive to change so scored red (R), however, development of the site could in turn reduce levels of deprivation.
- 3.7.16. Due to this professional expertise has been used to review and validate this initial RAG rating to provide the final assessment of each site.
- 3.7.17. This RAG assessment provided a good overview of key environmental, social and economic constraints at each of the sites, allowing for a more thorough assessment. This assessment has been used as a key starting point for assessing the effects of sites against the IIA framework objectives.

## Cumulative Effects

- 3.7.18. The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Therefore, a number of plans and policies (local, regional and national) have been reviewed for potential cumulative effects in addition to potential cumulative effects that could occur alongside the implementation of the draft Local Plan.
- 3.7.19. In addition, the assessment of sites has considered the cumulative effects of neighbouring development sites, including those beyond the borough boundary.
- 3.7.20. The assessment of cumulative effects has been identified in **Section 9** of this report.

## Mitigation, Enhancement Measures and Monitoring

- 3.7.21. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment as a result of implementing the plan. The measures are known as 'mitigation' measures.
- 3.7.22. Mitigation measures have been identified in relation to the assessment of policies, place visions, site allocations and site alternatives. These include both proactive avoidance of adverse effects and actions taken after potential effects have been identified. These are set out in **Section 10** of this report.
- 3.7.23. **Section 10** also includes enhancement measures, which aim to optimise positive impacts and enhance sustainability. The mechanism for delivery will ensure the promotion, prevention, reduction and offset of any significant adverse effects or enhancement opportunities on the environment.
- 3.7.24. The SEA Regulations also require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

## 3.8 Assumptions and Limitations

- 3.8.1. The preparation of the Local Plan alongside the IIA has allowed an iterative process of assessment and refinement in the narrative and policies within the Plan. Therefore, some of the recommendations set out in this report may already have been addressed in the Local Plan.
- 3.8.2. The assessment of policies, policy alternatives, sites and alternative sites, has been undertaken as a desk-based exercise using the baseline information from the Scoping Report. No site visits have been undertaken specifically for the purposes of the IIA.
- 3.8.3. WSP have ensured that effects are predicted accurately; however, this can be challenging given limited understanding of precisely how the plan will be implemented. Given

uncertainties there is inevitably a need to make some assumptions, however, these are made carefully and explained in detail within the assessment text.

- 3.8.4. In some instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is possible to comment on the potential positive and negative effects of the draft plan and its alternatives in more general terms.

## 4 Identification of Sustainability Issues and Opportunities and the IIA Framework

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### 4.1 Introduction

- 4.1.1. This section sets out the sustainability issues and opportunities for the Local Plan and the IIA Appraisal Framework, against which the Local Plan has been assessed.
- 4.1.2. A Scoping Report, in support of the emerging Local Plan, was produced by WSP in 2023, which initiated the SEA process (see **Table 3-1**). This report reviewed relevant legislation, plans, and programmes baseline, identified baseline information as well as key issues and opportunities for the Local Plan and identified an assessment framework.
- 4.1.3. This report was consulted on with the Statutory Consultees (Environment Agency, Historic England and Natural England) in July 2023 and details on their consultation comments can be found in **Appendix B**. It should be noted that the Environment Agency have received the IIA Scoping Report but are yet to comment. If comments are received, we will consider these at the Regulation 19 stage.

The baseline information used within the IIA Scoping Report is set out in **Appendix C**.

### 4.2 Review of Plans Policies and Programmes

- 4.2.1. A plan may be influenced in various ways by other plans, policies or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. These relationships enable the Responsible Authority to take advantage of potential synergies and to deal with any inconsistencies and constraints.
- 4.2.2. The Scoping Report undertook an initial review of policies, plans, programmes, strategies and initiatives that may have an impact on the preparation of relevant policies being reviewed as part of the Local Plan update. This review has informed both the development of the Local Plan and the IIA framework.
- 4.2.3. Full details on the review of plans, policies and programmes is set out in **Appendix D**.

### 4.3 Sustainability Issues and Opportunities

- 4.3.1. The Scoping Report set out a number of issues and opportunities for the Local Plan, for each of the IIA topics outlined in the Scoping Report. These have been summarised in **Table 4-1** below.

**Table 4-1 – Issues and Opportunities**

Topic	Issues and Opportunities
<b>Population and Equalities</b>	<ul style="list-style-type: none"> <li>■ There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income.</li> <li>■ There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities.</li> <li>■ The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile.</li> <li>■ Changing work habits such as remote, internet-based jobs are likely to reduce current demands but may also increase social isolation and reliance on alternative social interaction.</li> </ul>
<b>Human Health</b>	<ul style="list-style-type: none"> <li>■ LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness, smoking, and Sexually Transmitted Infection (STI) treatment.</li> <li>■ There are significant health inequalities amongst residents in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents.</li> <li>■ Covid-19 has also exacerbated existing inequalities in the borough.</li> <li>■ There are high levels of obesity within children aged 10-11 years.</li> </ul>
<b>Economy and Employment</b>	<ul style="list-style-type: none"> <li>■ LBTH is a major location for employment in London, attracting a large daytime population of employees.</li> <li>■ Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount are employed. Employed residents in LBTH have a higher gross value added (GVA) per head and gross weekly pay.</li> <li>■ However, there is a higher economic activity rate, with more males economically active than females.</li> <li>■ This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents.</li> <li>■ In the recovery of Covid-19 it is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough.</li> <li>■ Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping.</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>■ The average house price is over ten times higher than the average salary in the borough.</li> </ul>

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> <li>■ The population is increasing and becoming younger, with more residents requiring affordable housing.</li> <li>■ Rising costs of living are affecting the number of residents able to afford to buy.</li> <li>■ The Covid-19 pandemic and rising cost of living is increasing levels of homelessness and housing insecurity.</li> <li>■ There is a lack of affordable housing, meaning young people and/or lower income groups are missing out.</li> </ul>
<p><b>Crime and Safety</b></p>	<ul style="list-style-type: none"> <li>■ There is potential to increase engagement within communities to encourage the reporting of crimes.</li> <li>■ Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour.</li> <li>■ There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours.</li> <li>■ As the population within LBTH increases there are expected to be a greater number of vehicles on the borough’s roads, which may result in an increase in the number of accidents and those Killed or Seriously Injured (KSI) on roads.</li> <li>■ Children in the most deprived neighbourhoods are nearly three times more likely to be KSI as a pedestrian compared to non-deprived neighbourhoods.</li> <li>■ There are opportunities to increase the safety of active transport modes such as cycling and walking.</li> <li>■ Vulnerable road users such as cyclists and pedestrians are more likely to be casualties.</li> <li>■ There is potential to increase the standards and safety of housing within the borough.</li> </ul>
<p><b>Transport and Accessibility</b></p>	<ul style="list-style-type: none"> <li>■ There is a need to improve sustainable transport modes (public and active) in line with THBC’s commitment to reach net-zero GHG emissions by 2045.</li> <li>■ Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs.</li> <li>■ Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender.</li> <li>■ Changing work habits such as remote, internet-based jobs and working from home are likely to reduce transport demand.</li> <li>■ Health inequalities are prevalent in the borough, therefore reducing significant issues with traffic and congestion and subsequent air pollution is of utmost importance.</li> </ul>

Topic	Issues and Opportunities
<b>Biodiversity and Natural Capital</b>	<ul style="list-style-type: none"> <li>■ Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas, notably the European designations.</li> <li>■ Increasing population and associated developments may lead to fragmentation and urbanisation of natural habitats.</li> <li>■ Increasing population and developments may result in worsening air quality that may degrade the borough’s valuable ecological receptors.</li> <li>■ New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity.</li> <li>■ The inclusion of Blue Green Infrastructure (BGI) can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island (UHI) effects and help to make developments more climate resilient, especially when it comes to flood mitigation.</li> </ul>
<b>Landscape and Townscape</b>	<ul style="list-style-type: none"> <li>■ Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place.</li> <li>■ Future growth could risk compromising landscape and townscape character and features. However, a landscape-led design with GI principles in place could play a key role in the enhancement of the natural environment, visual amenity, and physical and mental health of the borough’s people.</li> <li>■ The design of new developments requires a landscape-led approach to design, to ensure the best placement and integration of the proposed development into the existing landscape, especially in sensitive locations. Landscape-led designs can help contribute to the climate change agenda, health and wellbeing, and tackling pollution in all its forms (such as air, light and noise).</li> <li>■ There is opportunity to increase access to green space and subsequently, to improve health and wellbeing, combat air pollution, provide storm water management and reduce flooding (contributing to climate change adaptation and mitigation) and provide connectivity through urban built form to the countryside for wildlife. It can also bring new audiences to tourist attractions and enable better appreciation of historic landscape assets through creating new views and vistas, providing information, and enhancing access.</li> <li>■ The incorporation of landscape principles that are suitable for future challenges and landscape-led designs would help to ensure infrastructure is designed for longevity in the 21st century, for both its people and its natural environment.</li> </ul>
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active modes and asset settings.</li> </ul>

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> <li>■ Trans-boundary matters should be noted and the impact that development in LBTH may have on heritage in other boroughs.</li> <li>■ There is potential for development to encroach on assets, particularly affecting the setting of assets, for example through land take, and increased noise and visual effects. Although damage to the significance and setting of assets from development is not limited to these factors; Archaeological remains, whether designated or not, normally require preservation <i>in situ</i>. This clearly has implications and can represent a significant constraint to future scheme design, which should respect, retain and protect the remains (e.g., through avoidance and redesign).</li> <li>■ Vehicle damage and pollution can adversely affect World Heritage Site's, listed buildings and scheduled monuments, so reducing vehicle movements within historic areas is also important to address.</li> <li>■ The New Local Plan should ensure that the local historic environment (including the archaeological resource) informs design proposals, public realm and landscaping schemes to help ensure that heritage assets and their settings are enhanced.</li> <li>■ There is potential for physical interventions to historic buildings intended to improve energy efficiency to adversely affect heritage significance if not carefully thought through and appropriate to the building in question</li> </ul>
<b>Water Environment</b>	<ul style="list-style-type: none"> <li>■ The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat.</li> <li>■ Upgrading existing infrastructure provides the opportunity to improve pollution control.</li> <li>■ Increased development (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale.</li> <li>■ Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the already stressed capacity of sewer systems.</li> <li>■ Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in LBTH.</li> </ul>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>■ The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation.</li> <li>■ More severe and frequent heat episodes as a result of climate change can contribute to the worsening of air quality.</li> <li>■ Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases.</li> </ul>

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> <li>■ The UK Government’s plan to end the sale of all new conventional petrol and diesel cars and vans by 2035 and support for work and home-based electric charging facilities, will promote use of hybrid and electric vehicles, with positive effects for air quality.</li> <li>■ Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality.</li> </ul>
<b>Climate Change and Greenhouse Gases</b>	<ul style="list-style-type: none"> <li>■ Transport is the largest contributor to Greenhouse Gas (GHG) emissions in the UK. In LBTH, the largest contributor is from commercial uses.</li> <li>■ Higher than average fuel poverty rates may continue to be a significant issue in the borough.</li> <li>■ Since the Covid-19 pandemic, private car use has increased which contributes to GHG emissions.</li> <li>■ The impacts of the Urban Heat Island (UHI) generated in London will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households.</li> <li>■ There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH.</li> <li>■ There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit.</li> </ul>
<b>Material Assets (including Soil Resources)</b>	<ul style="list-style-type: none"> <li>■ The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. This is highly important considering the Belvedere Energy from Waste (EfW) facility processes waste from across London.</li> <li>■ Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population.</li> <li>■ There is a continued increase in renewable energy supplies across the borough, of which needs to be managed efficiently to ensure the capacity requirements of this transition are met.</li> </ul>

## 4.4 IIA Appraisal Framework

- 4.4.1. The review of relevant plans, policies and programmes, collation of baseline information and identification of issues and opportunities, has been used to inform the IIA Appraisal Framework, which is set out in **Table 4-2** overleaf.
- 4.4.2. This table also sets out the spatial indicators used to assess each of the objectives as part of the site assessments.

**Table 4-2 – IIA Appraisal Framework**

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
<p><b>Population and Equalities</b></p>	<p><b>IIA1:</b> To build inclusive communities by reducing social exclusion, promoting equity, and equality and respecting diversity.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Help to reduce inequalities, particularly for those people and communities most vulnerable?</li> <li>■ Improve access to services, facilities and transport for all inclusively?</li> <li>■ Support diversity?</li> <li>■ Support population growth?</li> </ul>	<ul style="list-style-type: none"> <li>■ Population density</li> <li>■ Indices of Multiple Deprivation (IMD) Overall Deprivation</li> <li>■ Primary Schools</li> <li>■ Secondary Schools</li> <li>■ Higher Education</li> <li>■ Healthcare Provision (GP, dentists, pharmacies and hospitals)</li> <li>■ Children and Family Centres</li> <li>■ Community Centres</li> <li>■ Leisure Services</li> <li>■ Social Services</li> </ul>
<p><b>Human Health</b></p>	<p><b>IIA2:</b> To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH’s residents.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Promote healthier lifestyles?</li> <li>■ Increase walking and cycling?</li> <li>■ Improve quality, quantity and equality of access to green and blue space and increase opportunities for recreation?</li> <li>■ Promote health enhancing environments, behaviours and activities for local communities?</li> <li>■ Reduce inequalities?</li> <li>■ Increase inclusion and reduce loneliness?</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Health Deprivation</li> <li>■ Life expectancy (males and females)</li> <li>■ Primary Schools</li> <li>■ Secondary Schools</li> <li>■ Higher Education</li> <li>■ Healthcare Provision (GP, dentists, pharmacies and hospitals)</li> <li>■ Children and Family Centres</li> <li>■ Community Centres</li> <li>■ Allotments</li> <li>■ Leisure Services</li> <li>■ Social Services</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<ul style="list-style-type: none"> <li>■ Help prevent risks to human health, which arise from noise and air pollution?</li> <li>■ Support the UK's levelling up agenda?</li> <li>■ Reduce the pressure of the rising cost of living?</li> <li>■ Increase exposure to noise and air pollution?</li> </ul>	<ul style="list-style-type: none"> <li>■ Sports Facilities</li> <li>■ Areas Deficient in Nature</li> </ul>
<p><b>Economy and Employment</b></p>	<p><b>IIA3:</b> To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.</p> <p><b>IIA4:</b> To ensure that residents have employment opportunities and access to training.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Increase job availability?</li> <li>■ Improve access to employment centres?</li> <li>■ Improved connectivity between business clusters and housing markets?</li> <li>■ Support flexible working patterns?</li> <li>■ Help support changing retail patterns?</li> <li>■ Increase retail floorspace?</li> <li>■ Increase footfall and local spending from commuters, residents and tourists?</li> <li>■ Meet the skills needs and future demand for labour?</li> <li>■ Diversify the labour market?</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Employment</li> <li>■ IMD Income</li> <li>■ Local Industrial Location</li> <li>■ Strategic Industrial locations</li> <li>■ Employment sites</li> <li>■ Local Employment Location</li> <li>■ Higher Education</li> <li>■ Central Activities Zone</li> <li>■ Tower Hamlets Activity Zone</li> <li>■ Primary Shopping Areas</li> <li>■ Neighbourhood Parades</li> <li>■ Primary Shopping Areas</li> <li>■ Town Centres (major, district and neighbourhood)</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
<p><b>Housing</b></p>	<p><b>IIA5:</b> To meet the housing needs of all of the borough's residents inclusively.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Help to sufficiently meet the borough's housing target?</li> <li>■ Increase affordability?</li> <li>■ Optimise proposed sites to maximise housing delivery?</li> <li>■ Reduce housing deprivation?</li> <li>■ Meet the needs of all groups inclusively (elderly residents, young families, disabled, ethnic minorities etc.)?</li> <li>■ Support those with protected characteristics (e.g., the gypsy and traveller community)</li> <li>■ Increase the quality of existing housing stock?</li> <li>■ Reduce overcrowding?</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Barriers to housing (LSOA)</li> <li>■ House Prices (wards)</li> </ul>
<p><b>Crime and Safety</b></p>	<p><b>IIA6:</b> To reduce crime and the fear of crime for all residents inclusively</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Improve safety?</li> <li>■ Ensure that residents feel safe, particularly after dark?</li> <li>■ Support designing out crime principals?</li> <li>■ Reduce levels of crime derivation?</li> <li>■ Improve road safety and reduce the number of people KSI on the roads,</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Crime</li> <li>■ Crime Rate by ward</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<p>particularly children from deprived backgrounds?</p> <ul style="list-style-type: none"> <li>■ Create spaces where women and girls feel safe and included?</li> </ul>	
<p><b>Transport and Accessibility</b></p>	<p><b>IIA7:</b> To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.</p> <p><b>IIA8:</b> To protect and enhance access to essential services and facilities for all residents.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Support the use of sustainable transport modes?</li> <li>■ Improve access to services, facilities and transport?</li> <li>■ Reduce demand for use of the private car and facilitate a modal shift to more sustainable modes?</li> <li>■ Ensure that all groups can access services and facilities inclusively?</li> <li>■ Support EV infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>■ Public Transport Accessibility Levels (PTAL)</li> <li>■ Bus Stops</li> <li>■ National Rail Train Station/ Tube Station</li> <li>■ Primary Schools</li> <li>■ Secondary Schools</li> <li>■ Higher Education</li> <li>■ Healthcare Provision</li> <li>■ Children and Family Centres</li> <li>■ Community Centres</li> <li>■ Leisure Services</li> <li>■ Social Services</li> <li>■ Sports Facilities</li> <li>■ Primary Shopping Areas</li> <li>■ Neighbourhood Parades</li> <li>■ Primary Shopping Areas</li> <li>■ Town Centres (major, district and neighbourhood)</li> </ul>
<p><b>Biodiversity and Natural Capital</b></p>	<p><b>IIA9:</b> To protect and enhance protected habitats, species and valuable ecological networks that contribute to</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Cause damage to locally and nationally designated sites through infrastructure provision, increased</li> </ul>	<ul style="list-style-type: none"> <li>■ Local Nature Reserve (LNR)</li> <li>■ National Nature Reserve (NNR)</li> <li>■ Priority Habitat</li> <li>■ Site of Importance for Nature Conservations (SINC)</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
	ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.	<p>development, recreational pressures, traffic or maintenance?</p> <ul style="list-style-type: none"> <li>■ Maintain and enhance biodiversity in the borough?</li> <li>■ Seek opportunities for biodiversity for at least 10% net gain?</li> <li>■ Increase provision of ecosystem services from the borough’s natural capital?</li> <li>■ Prevent fragmentation of habitats and promote ecological networks?</li> <li>■ Result in developments which will improve biodiversity on site?</li> <li>■ Fragment habitat connectivity and reduce the ability for biodiversity to thrive?</li> </ul>	<ul style="list-style-type: none"> <li>■ SAC</li> <li>■ Site of Special Scientific Interest (SSSI)</li> <li>■ SPA</li> <li>■ Green Grid Network</li> </ul>
<b>Landscape and Townscape</b>	<b>IIA10:</b> To protect and enhance the borough’s townscapes and landscapes.	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Respect, maintain and strengthen local character and distinctiveness?</li> <li>■ Achieve high quality sustainable design for buildings, spaces and the public realm?</li> <li>■ Improve the quality and condition of the townscape and landscape?</li> <li>■ Improve the quality of parks and open spaces?</li> <li>■ Incorporate green and blue infrastructure into design?</li> </ul>	<ul style="list-style-type: none"> <li>■ Borough Designated Views</li> <li>■ London View Management Framework</li> <li>■ Tall Building Zone</li> <li>■ Strategically Important Skyline</li> <li>■ London Squares</li> <li>■ Local Open Space</li> <li>■ Metropolitan Open Land</li> <li>■ Green Grid Network</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
<b>Historic Environment</b>	<b>IIA11:</b> To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>■ Contribute to the better management of heritage assets and contribute to conserving heritage at risk?</li> <li>■ Improve the quality and condition of the historic environment?</li> <li>■ Respect, maintain and strengthen local character and distinctiveness?</li> </ul>	<ul style="list-style-type: none"> <li>■ Listed Buildings</li> <li>■ Registered Parks and Gardens</li> <li>■ Scheduled Monuments</li> <li>■ Heritage at risk</li> <li>■ Conservation areas</li> <li>■ Archaeological Priority Area</li> </ul>
<b>Water Environment</b>	<b>IIA12:</b> To reduce the risk and vulnerability to flooding.  <b>IIA13:</b> To maintain and enhance water quality.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Reduce the risk of flooding?</li> <li>■ Result in urban creep?</li> <li>■ Increase surface runoff?</li> <li>■ Result in the reduction of water quality (including groundwater)?</li> <li>■ Support the protection and enhancement of water bodies (including groundwater)?</li> <li>■ Encroach on the 10m buffer zone next to a watercourse?</li> <li>■ Alter the natural state of the river corridor?</li> <li>■ Re-naturalise the river corridor and promote geomorphological</li> </ul>	<ul style="list-style-type: none"> <li>■ Statutory Main River</li> <li>■ Water Spaces</li> <li>■ Flood Zones (2, 3, 3a)</li> <li>■ Flood Risk Area</li> <li>■ Critical drainage area</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<p>processes which enhance and protect biodiversity?</p> <ul style="list-style-type: none"> <li>■ Support a natural form of flood management which also promotes biodiversity of the watercourse?</li> </ul>	
<p><b>Air Quality</b></p>	<p><b>IIA14:</b> To protect and enhance air quality.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Support measures to reduce levels of air pollution?</li> <li>■ Help to improve air quality?</li> <li>■ Support measures for the reduction of congestion and traffic levels particularly in AQMAs and congestion hot-spots?</li> </ul>	<ul style="list-style-type: none"> <li>■ Nitrogen dioxide (NO<sub>2</sub>)</li> <li>■ Particulate Matter (PM<sub>10</sub>)</li> <li>■ Motor Vehicle restricted area</li> <li>■ Air Quality Focus Areas</li> <li>■ Ultra Low Emission Zone (ULEZ)</li> </ul>
<p><b>Climate Change and Greenhouse Gases</b></p>	<p><b>IIA15:</b> Ensure that Tower Hamlets is resilient to the effects of climate change.</p> <p><b>IIA16:</b> To reduce GHG emissions, support national and local decarbonisation initiatives and encourage energy efficiency.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Support low carbon and energy efficient design?</li> <li>■ Contribute further to the urban heat island effect?</li> <li>■ Ensure new development is designed to mitigate overheating risk?</li> <li>■ Increase the resilience of infrastructure and material assets to the impacts of climate change (including flood risk, extreme weather, heat and cold)?</li> </ul>	<ul style="list-style-type: none"> <li>■ Overall Climate Risk</li> <li>■ Overall Heat Risk</li> <li>■ Flood Zone</li> <li>■ Flood Risk Area</li> <li>■ NO<sub>2</sub></li> <li>■ PM<sub>10</sub></li> <li>■ Motor Vehicle restricted area</li> <li>■ ULEZ</li> </ul>

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<ul style="list-style-type: none"> <li>■ Contribute to reducing emissions as per the Paris Agreement?</li> <li>■ Support the borough’s Net Zero ambitions by 2045?</li> </ul>	
<p><b>Material Assets (including Soil Resources)</b></p>	<p><b>IIA17:</b> To reduce the amount of waste produced and minimise the amount sent to landfill.</p> <p><b>IIA18:</b> To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>■ Support the use of brownfield land?</li> <li>■ Support the use of sustainable materials?</li> <li>■ Minimise the amount of waste?</li> <li>■ Increase renewable energy generation?</li> <li>■ Support low carbon, energy efficient design?</li> <li>■ Reduce levels of embodied carbon?</li> </ul>	<ul style="list-style-type: none"> <li>■ Brownfield Land</li> <li>■ Waste management sites</li> <li>■ Safeguarded Wharves</li> </ul>

## 5 Compatibility Assessment of Strategic Policies and Objectives

### 5.1 Introduction

- 5.1.1. This section assesses the compatibility of the Objectives and Strategic Policies against the IIA Appraisal Framework objectives.
- 5.1.2. The Strategic Policies and Objectives have been individually tested against the IIA Appraisal Framework objectives to identify both potential synergies and inconsistencies. This information can help in developing and refining the objectives of the Local Plan.
- 5.1.3. **Table 5-1** below sets out the key to appraisal, whilst **Table 5-2** overleaf sets out the findings of the compatibility testing of the Strategic Policies and the Strategic Objectives.

**Table 5-1 – Key to Compatibility Assessment**

Effect	Key
Compatible	✓
Incompatible/ potential conflict	✗
No relationship	0
Uncertain/ more than one potential outcome	?

**Table 5-2 – Compatibility Assessment**

	IIA1: Population and Equalities	IIA2: Human Health	IIA3: Economy	IIA4: Employment	IIA5: Housing	IIA6: Crime and Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity and Natural Capital	IIA10: Landscape and Townscape	IIA11: Historic Environment	IIA12: Flood Risk	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change	IIA16: Greenhouse Gases	IIA17: Waste	IIA18: Efficient use of Resources
Vision	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	?	?	✓	?	✓	?	?
Objective 1: Empowering our communities culturally, economically, and politically	✓	✓	✓	✓	0	0	0	0	0	✓	✓	0	0	0	0	0	0	0
Objective 2: Tackling overcrowding and housing in our borough	✓	✓	0	0	✓	0	0	✓	?	?	?	?	0	0	0	?	?	✓
Objective 3: Supporting young people and accelerating education	✓	✓	✓	✓	0	✓	0	✓	✓	✓	0	0	0	0	0	0	0	0
Objective 4: A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities	✓	✓	✓	✓	0	0	✓	✓	0	0	0	0	0	0	0	0	0	0
Objective 5: Securing infrastructure delivery to protect and strengthen public services	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	0	0	0	?	?	0
Objective 6: A clean and green future	✓	✓	0	0	0	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓
Objective 7: Healthy, safe and inclusive neighbourhoods	✓	✓	✓	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0

## 5.2 Compatibility Assessment Summary

- 5.2.1. In general, the Vision and Objectives have performed well against the majority of the IIA objectives and clearly demonstrate their compatibility. Whilst the assessment has not identified any incompatible effects, some uncertainties have been identified.
- 5.2.2. On the whole, the Vision and supporting Objectives have predominantly resulted in a positive effect as it covers the three key pillars of sustainability (economy, social and environment) and aims to tackle key issues such as climate change, net zero, biodiversity loss, inequalities, overcrowding and affordable housing, which aligns with the aims and aspirations of the IIA objectives.
- 5.2.3. Due to the cross-cutting nature of the 'clean and green future' objective (Objective 6), this is the most compatible across all objectives. LBTH aim to reduce their dependence on cars and improve both the natural and built environment to make walking and cycling attractive for local journeys, providing greater accessibility. This will allow residents to live their lives more locally, creating more inclusive neighbourhoods, having positive effects on population and equalities (IIA1) and human health (IIA2). Reducing the need to travel will also result in positive outcomes for IIA7 (sustainable transport) and IIA8 (accessibility).
- 5.2.4. Objective 6 also aims to improve air quality (IIA14), set high energy standards and support zero carbon developments (IIA16 and IIA18). Further support is also provided to ensuring climate resilience through greater mitigation for flood risk both now and in the future.
- 5.2.5. The Vision and Objectives 2 and 5 have identified the potential for uncertain effects on a number of IIA objectives. This is due to the potential for these policies to result in large scale development and infrastructure to support the borough's communities. These sites are likely to require land take, which may negatively affect biodiversity and natural capital (IIA9) and depending upon the location, the surrounding landscape and townscape (IIA10) and historic environment (IIA11). Similarly, the increase in development may increase levels of embodied carbon and operational GHG (IIA16), generate large amounts of waste (IIA17) and may contribute to increases levels of flood risk (IIA12).
- 5.2.6. However, as this is a high-level Vision and overarching objectives, there is no certainty to how such development might arise, and there may be potential for developments to bring about positive effects on these objectives.
- 5.2.7. Waste (IIA17) is the only IIA objective which does not have any compatibility with either the vision or any objectives. Neither the vision or objectives make reference to minimising waste or encourage the use of sustainable materials.

## 6 Assessment of Policies

### 6.1 Introduction

- 6.1.1. The assessment of the Local Plan policies is summarised below and presented in full in **Appendix F**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 6-1** below. It should be noted that the Policy themes have been assessed as a whole against each of the IIA objectives, rather than each individual policy.
- 6.1.2. Each of the policy themes have been assessed in isolation, without mitigation. The assessment purely assesses the outcome of the application of those policies rather than their relationship with other policies within the plan. Further details on the combination effects with other policies have been identified in within the individual assessment summaries in **Appendix F** as well as **Section 9 – Cumulative Effects**.
- 6.1.3. **Table 6-2** overleaf provides an overview on the performance of the Local Plan policy themes against each IIA objective and **Table 6-3** outlines significant effects based on each IIA objective. For the purpose of the IIA, significant effects are deemed to be the following:
- Significant Positive effects;
  - Significant Negative effects; and
  - Uncertain effects.
- 6.1.4. Further details on the insignificant effects i.e., minor positive, minor negative, mixed and neutral effects are detailed in **Appendix F**. The Appendix also sets out the nature of effects such as magnitude, spatial extent and duration.

**Table 6-1 – Significance of Effect**

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-

Effect Significance	Key
Negligible / No effect	0

## 6.2 Summary of Effects

Table 6-2 provides an overview on the performance of the Local policy themes against each IIA objective and Table 6-3 outlines significant effects based on each IIA objective.

Table 6-2 – Overview of Policies

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA1: Population & Equalities	++	++	+	++	+	++	++	++	++	0
IIA2: Human Health	++	++	++	++	+	+	++	++	++	+
IIA3: Economy & Town Centres	++	++	0	+	++	++	++	0	+	0
IIA4: Employment & Skills	++	+	+	0	++	++	++	0	0	+
IIA5: Housing	+	++	+	+	-	0	0	0	0	+

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA6: Crime & Safety	+	+	0	++	0	+/-	+	+	++	+
IIA7: Sustainable Transport	+	+	+	+	++	+	+	+	?	+
IIA8: Accessibility	++	+	0	++	+	+	++	+	++	0
IIA9: Biodiversity & Natural Capital	+	+/-	++	+	?	0	?	++	?	?
IIA10: Landscape & Townscape	+	+/-	+	++	+/-	+	?	++	+/-	?
IIA11: Historic Environment	+	?	+	++	+/-	?	?	+	+/-	?
IIA12: Flooding	++	?	++	+	?	0	0	++	0	0

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA13: Water Quality	+	0	++	+	0	0	0	++	?	?
IIA14: Air Quality	+	+/-	++	+	+/-	+	+	+	?	+/-
IIA15: Climate Change & Resilience	+	+	++	+	0	0	0	++	0	0
IIA16: GHG Emissions	+	?	++	+	?	0	?	+	+/-	+/-
IIA17: Waste	+	?	++	+	?	0	?	0	?	++
IIA18: Efficient use of Land and Resources	0	+/-	++	+	+	+	+	+/-	?	0

**Table 6-3 – Summary of Significant Effects**

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA1: Population &amp; Equalities</b>	7	0	0	<p>Out of all of the IIA Objectives, IIA1 has resulted in the highest number of significant positive effects. These effects are generally attributed to the support provided to the needs of all of the borough’s residents inclusively, both now and in the future. Both the Town Centre and Community Infrastructure policies will increase community facilities.</p> <p>More specifically, Policy PS4 within People, Places and Spaces theme will ensure that all genders are able to access community spaces equally. Additionally, both MC1 and MC2 (within the Movement and Connectivity theme) provide improved accessibility to all social groups, including disabled, elderly, women and girls and other marginalised groups.</p>
<b>IIA2: Human Health</b>	7	0	0	<p>Seven out of the ten policy themes have resulted in significant positive effects on IIA2. Most of these effects have been identified for those policies which aim to provide more community infrastructure and green spaces, enable greater levels of physical activity and improve standards of living. Not only will policies improve physical health but also mental wellbeing.</p> <p>More specifically, Policy PS3 (within the People, Places and Spaces theme), Policy BO2 (within the Biodiversity and Open Space theme), and Policies G2, CG3 and CG4 (within Clean and Green Future) tackle adverse effects that environmental factors such as overheating, wind, air pollution, light pollution noise pollution, and odours which can have harmful effects on human health.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA3: Economy &amp; Town Centres</b>	5	0	0	<p>The Town Centre Policies have had significant positive effects on IIA3 as they contribute to increasing footfall and improving the diversity of the economy within Tower Hamlets, encouraging economic growth through a range of sectors across the borough. Similarly, the Policies within the Inclusive Economy and Good Growth theme have resulted in significant positive effects through creating jobs, employment spaces and attracting inward investment into the borough.</p> <p>Further indirect significant positive effects have been derived from the Homes for the Community, Delivering the Local Plan and Community Infrastructure policy themes, as these will likely bring new facilities and services to support the local population and increase economic output and productivity.</p>
<b>IIA4: Employment &amp; Skills</b>	4	0	0	<p>Four out of the ten policy themes have resulted in Significant positive effects on IIA4. Those significant positive effects are generally attributed to those policies which aim to increase employment opportunities across a number of sectors and provide learning and development opportunities.</p> <p>More specifically Policy EG1 will provide improved job opportunities for all groups of the working population, including those with current low levels of education. The policy also provides jobs across the borough, providing jobs for a range of communities. Similarly, Policy DV1 (within the Delivering the Local Plan theme) protects and enhances existing employment locations within the borough, as well as supporting a mix of new employment opportunities including affordable workspaces, to encourage a diverse range of employment opportunities.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA5: Housing</b>	1	0	0	<p>Whilst a number of minor positive effects have been identified for IIA5, it is just the Homes for the Community policies which have resulted in Significant positive effects. All policies within this theme will help to deliver a wide variety of housing to suit the needs of all residents and exceeds the borough’s housing targets.</p> <p>In addition to the delivery of new housing, Policy HFC3 aims to protect existing housing, particularly ensuring that the supply of self-contained homes and in particular family-sized homes is maintained. Similarly, HC4 will ensure that any existing homes meet the latest Decent Homes Standard.</p>
<b>IIA6: Crime &amp; Safety</b>	2	0	0	<p>The People Places and Spaces and Movement and Connectivity policy themes have resulted in significant positive effects on IIA6. These effects have been identified for those policies such as PS4 and MC2 that directly tackle crime and improve safety, as well as those policies that support improvements to the public realm. Improvements to the public realm and incorporation of high-quality design can engender a sense of pride in a place, which in turn can help to discourage crime.</p>
<b>IIA7: Sustainable Transport</b>	1	0	1	<p>The Inclusive Economy and Good Growth policy theme is the only themes that has resulted in significant positive effects on IIA7. Policies within these themes will help to reduce reliance upon the private vehicles and contribute to a modal shift.</p> <p>Whilst the Movement and Connectivity policy theme has the potential to result in significant positive effects through enhanced sustainable transport and support of a modal shift, there is some uncertainty around the additional provision of parking as</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				a result of MC4, and whether this could lead to an increase in the reliance and convenience of motorised vehicles. This will very much depend on the implementation and the number of additional spaces provided.
<b>IIA8: Accessibility</b>	4	0	0	<p>Of the ten policy themes, four have resulted in significant positive effects on IIA8. Policies will improve accessibility by provide greater connectivity to active transport as well as enhancing and increasing access to essential services and facilities for all residents. This will not only result in a modal shift but allow residents to live their lives more locally.</p> <p>Policy PS4 specifically outlines the requirements for development to maintain accessible street networks and enhance connectivity through developments. This includes connectivity to public transport hubs and improving accessibility around the borough.</p>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	2	0	4	<p>All policies within the Biodiversity and Open Space policy theme contribute to improving biodiversity and natural capital across the borough, including improving and enhancing blue and green spaces, green infrastructure, and contributing towards biodiversity net gain (BNG). This has resulted in significant positive effects on IIA9. Additionally, Policy CG9 within Clean and Green Future has resulted in significant positive effects on IIA9 through improvements to biodiversity as a result of reduce air pollution and utilisation of nature-based solutions.</p> <p>Four of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could give rise to the</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				loss of biodiversity and natural capital, but as the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
<b>IIA10: Landscape &amp; Townscape</b>	2	0	2	<p>The Biodiversity and Open Space and People, Places and Spaces policy themes have resulted in Significant positive effects on IIA10. These policies will help to maintain and enhance the landscape and townscape character in the borough, by enhancing the public realm and preserving Metropolitan Open Land (MOL) and green and blue spaces.</p> <p>Two of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could be insensitively designed and/ or result in the loss of greenspace, but as the location and overall design of proposals is not yet known uncertain effects have been identified.</p>
<b>IIA11: Historic Environment</b>	1	0	4	<p>The People, Places and Spaces policies are the only policy theme that has resulted in significant positive effects on IIA11. Within this groups Policy PS6 specifically outlines the preservation and enhancement of designated and non-designated heritage assets, including archaeological areas and heritage at risk. Policy PS7 also requires the safeguarding of the two World Heritage Sites within the borough, resulting in positive effects.</p> <p>Four of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could be insensitively designed and/ or result in the degradation and loss of the historic environment. As</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				the location and overall design of proposals is not yet known uncertain effects have been identified.
<b>IIA12: Flooding</b>	3	0	2	<p>The Developing the Local Plan, Clean and Green Future and Biodiversity and Open Space policy themes have both resulted in Significant positive effects on IIA12. Policies within these themes (specifically DV4, CG6, CG7, BO2 and BO3) aim to address flood risk and incorporate measures such as Sustainable Urban Drainage Systems (SuDs) and soft landscaping.</p> <p>Uncertain effects have arisen where there is it is not clear on the number of sites and developments which may come forward as a result of policies. Urban intensification and additional development within the borough could increase flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.</p>
<b>IIA13: Water Quality</b>	2	0	2	<p>The Clean and Green Future and Biodiversity and Open Space policy themes have both resulted in Significant positive effects on IIA12. Policies within these themes (specifically CG8, CG7, BO1 and BO3) aim to protect the water environment and its habitats and ensure that development does not adversely affect the water quality within the borough. Policies also aim to reduce the pressure on the fresh and wastewater systems through reducing demand and increasing water efficiency.</p> <p>Due to the proposed use of water transport, the Reuse, Recycling and Waste and the Movement and Connectivity policy themes have resulted in uncertain effects. There is potential that increase waterborne transport could result in an increase in</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				water pollution and decrease in overall water quality. However, at this stage the potential increase in water transport is not known, so uncertain effects have been identified.
<b>IIA14: Air Quality</b>	1	0	1	<p>The Clean and Green Future policy theme has resulted in significant positive effects. Policies within these themes (specifically CG9 and MC3) address the poor air quality within the borough and the need for developments to mitigate and improve air quality, including promoting low or zero emission transport and reducing vehicle reliance.</p> <p>Whilst the Movement and Connectivity policy theme has the potential to result in significant positive effects through enhanced sustainable transport, there is some uncertainty around the additional provision of parking as a result of MC4, and whether this could lead to an increase in air pollution in areas with existing public transport connectivity issues. This will very much depend on the implementation and the number of additional spaces provided.</p>
<b>IIA15: Climate Change &amp; Resilience</b>	2	0	0	The Biodiversity and Open Space and Clean and Green Future policy themes have resulted in significant positive effects on IIA15. Both themes (specifically policies BO5, CG1, CG5 and CG6) promote measures such as green roofs and walls, SuDS, and soft landscaping, which will help to address issues such as flooding, pollution and overheating.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA16: GHG Emissions</b>	1	0	3	<p>The Clean and Green Futures theme is the only policy theme to result in significant positive effects on IIA16. These policies contribute to reducing GHG emissions through the reduction in energy usage, and vehicle reliance.</p> <p>Due to the potential for significant levels of development and potential increases in embodied carbon, the Movement and Connectivity, Community Infrastructure and Homes for the Community policy themes have resulted in uncertain effects. At this stage it is not clear whether developments include measures to reduce GHG emissions and include renewable energy generation. As many of these measures will be determined by scheme level design, uncertain effects have been identified.</p>
<b>IIA17: Waste</b>	2	0	4	<p>The Clean Green Future and Reuse, Recycling and Waste policy themes have resulted in significant positive effects on IIA17. These policies will help to improve waste facilities, minimise the amount of waste going to landfill, by supporting re-use and recycling and promoting more efficient use of materials.</p> <p>Some proposals which may come forward as a result of the Movement and Connectivity, Homes for the Communities, Community Infrastructure and Inclusive Economy and Good Growth policy themes may be resource intensive and could generate a significant amount of construction waste. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA18: Efficient use of Land and Resources</b>	1	0	1	<p>The Clean and Green Future policy theme is the only theme to result in significant positive effects on IIA18. Policies CG1 and CG11 aim to minimise the use of natural resources, support a circular economy, remediate contaminated land, improve the quality of land within Tower Hamlets and contribute to the utilisation of brownfield land.</p> <p>There are some uncertain effects associated with the Movement and Connectivity policy theme as the location of some proposals that may come forward as a result of these policies is not yet known. Whilst it is likely that the majority may result in the reallocation of the existing road network, there could be potential for some land take. If a preference for road network reallocation is sought there is potential for positive effects.</p>

## 6.3 Assessment of Policy Alternatives

- 6.3.1. The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 6.3.2. The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Local Plan and the application of the London Plan. Both of these plans have undergone examination and proven to be robust and at this stage provide a realistic alternative scenario.
- 6.3.3. As the Local Plan is iterative process, there are likely to be policy changes and amendments which will emerge throughout the process. This will provide further reasonable alternatives, for which the IIA can assess. Policy changes/ alternatives will be assessed at the Regulation 19 stage.
- 6.3.4. In general, the continuation of the existing Local Plan and London Plan Policies have resulted in less significant positive effects. However, the policies within each plan do remain relevant and the majority are fit for purpose.
- 6.3.5. The London Plan lack specific borough details, that the local plan can provide, whilst some of the existing Local Plan policies are outdated, and no longer reflect key issues such as the Covid-19 recovery, rising costs of living and increases in crime against women and girls.
- 6.3.6. The assessment demonstrates a clear need for an updated Local Plan in order to better guide decisions on future development proposals and addresses the needs and opportunities within the borough.
- 6.3.7. **Table 6-4** below provides a summary of the application of these scenarios. It uses the same key to effects outline in **Table 3-2**.

**Table 6-4 - Assessment of Policy Alternative Scenarios**

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
<b>IIA1: Population and Equalities</b>	<p>The existing Local Plan includes policies such as S.CF1, D.CF2, and D.CF3 that include the supporting of existing community facilities and the development of new community facilities. These policies are likely to preserve the existing community facilities, but also provide facilities such as early education, primary and secondary education, and care facilities. The development of facilities such as this will continue to provide for the future population of Tower Hamlets.</p> <p>Policy S.CF1 also includes measures to ensure accessible facilities and services, providing access for various population groups. However, the existing local plan does not include a specific policy relating to equalities. Minor positive effects have therefore been identified.</p>	+	<p>There are a number of policies within the London Plan, including GG1, GG4 and GG5 that contribute to improvements to communities within Tower Hamlets. The London Plan also aims to improve growth and inclusive development within the Borough, including accessible design with policy D5.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the population in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects. Additionally, as the population in Tower Hamlets is predicted to grow by 8.4%, with more people living on their own and increased in diversity within communities, the policies within the London Plan may not include sufficient infrastructure to provide for future population growth within Tower Hamlets. Therefore, resulting in minor positive effects.</p>	+
<b>IIA2: Human Health</b>	<p>A number of policies within the existing Local Plan will indirectly contribute to improving the health of residents within the Borough through encouraging healthy lifestyles. Policy S.SG1 also includes supporting the delivery of new healthcare facilities, providing for current and future residents of Tower Hamlets.</p> <p>The Plan also includes policy D.SG3 (Health Impact Assessments) which aims to ensure development contributed to a healthy built environment. The policy also requires the enhancement of positive impacts of development and mitigation of negative impacts.</p> <p>The development of new health infrastructure and promotion of healthy communities, alongside Health Impact Assessments, results in significant positive effects.</p>	++	<p>Policy GG3 identifies the need for new developments to assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.</p> <p>The Plan also sets out policies for the provision of housing (Chapter 4), the protection and provision of community facilities, education and health care (S2, S3, GG3), the provision and protection of sports facilities and open spaces (S5, S11), and healthy streets (T2).</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the health and wellbeing in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects.</p>	+
<b>IIA3: Economy</b>	<p>There are a number of policies within the Plan that will contribute to growing the economy in Tower Hamlets. This includes those policies within Chapter 10 (delivering economic growth) and Chapter 11 (revitalising our town centres). The development of policies within these chapters include the chapter policy D.CF4 (public houses), and a number of policies to preserve and enhance the vitality of town centres within Tower Hamlets.</p> <p>The revitalisation of town centres is likely to encourage users into these areas and encourage economic growth within the Borough. Additionally, the preservation of unique high streets such as Columbia Road and Redchurch Street contribute to enhancing the diversity of Tower Hamlets economy. However, since the Covid-19 pandemic, and a rise in interest rates, the economy has changed significantly. Therefore the developments proposed may not reflect the current economic needs of these areas. Minor positive effects are therefore identified.</p>	+	<p>Policy GG5 aims to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners.</p> <p>There are also a number of strategies within the London Plan, namely those within Chapter 6 (Economy) such as E1, E8, E2, and E3 that contribute to improving economic growth and business investment within London.</p> <p>However, since the Covid-19 pandemic, the economy has changed significantly, and the London may not be robust enough to address these issues. Effects are therefore limited to minor positive effects.</p>	+

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
<b>IIA4: Employment</b>	<p>The following policies within the existing Local Plan contribute to employment improvements within the Borough; S.EMP1 (creating investment and jobs), D.EMP2 (new employment space), D.EMP3 (loss of employment space), and D.EMP4 (re-development within designated employment areas).</p> <p>The development of additional employment space provides new opportunities for jobs within the Borough for current and future populations. Additionally, the development of new, and redevelopment of existing, employment spaces may provide a range of workspaces for businesses of varying sizes, providing a diverse range of job opportunities.</p>	+	<p>Policy GG5 plans for sufficient employment and industrial space in the right locations to support economic development and regeneration. The London Plan proposes Growth Corridors and Opportunity Areas which are described as large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility. There is one opportunity area located in Tower Hamlets, the Isle of Dogs.</p>	+
<b>IIA5: Housing</b>	<p>All policies within Chapter 9 of the existing Local Plan improve housing within the Borough, including housing standards. Policy S.H1 (meeting housing needs) outlines the delivery of at least 58,965 new homes across the borough (3,931) per year up to 2031. Within this new housing is a required provision of affordable housing and different housing types. This contributes to supplying housing that fits the needs of residents within the borough, for example, single occupancy rental accommodation.</p> <p>Policy D.H4 also includes measures for specialist housing, including the preservation of existing housing and the development of new specialist housing. Additional policies such as D.H5 (gypsies and travellers accommodation) and D.H6 (student housing) support the needs of a number of groups inclusively.</p> <p>However, as the population of Tower Hamlets is anticipated to grow by 8.4%, the outlined provision of housing may not support the needs of the growing population. Minor positive effects are therefore identified.</p>	+	<p>The London Plan 2021 identifies a 10-year minimum housing supply target of 34,730 homes within the borough over the period 2019/20 to 2028/29. This is equivalent to a minimum requirement of 3,473 homes per year. This is likely to help increase the supply within the borough. A number of policies, including H1, H4, H6 and H7 include the provision of increased and affordable housing, supporting housing requirements within London.</p> <p>The requirement of 50% of all new homes delivered across London to be genuinely affordable, will also help more people access housing and could help to reduce levels of housing deprivation. Policies also support specialist housing for older people (H13), gypsy and traveller accommodation (H14) student accommodation (H15) and shared living (H16), supporting good development to meet the needs of a number of groups inclusively.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting housing in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects.</p>	+
<b>IIA6: Crime and Safety</b>	<p>There is no specific policy within the existing local plan that addresses crime within Tower Hamlets. However, policy D.DH2 (attractive streets, spaces and public realm) does include prime prevention security measures that should be included within developments.</p> <p>The lack of policy relating to crime within the Borough has resulted in significant negative effects.</p>	--	<p>The London Plan does not benefit from a standalone policy on crime and safety; however it is an underlying theme in a number of policies such as supporting the night time economy (HC6) building strong and inclusive communities (GG1) and Safety, security and resilience to emergency (D11).</p> <p>Given the rising crime rates across London, the Plan does not adequately address these issues. Policies are unlikely to significantly address crime within Tower Hamlets, therefore minor negative effects have been identified.</p>	-
<b>IIA7: Transport</b>	<p>Policies within Chapter 16 of the existing Local Plan address travel within the Borough. Policy S.TR1 includes the provision of sustainable travel modes, including walking and cycling. However, the policy does not include detailed measures to address the significant issues on the highway network, including congestion. The policies also try to limit disruptions to the transport network where possible.</p> <p>However, the application of these policies across Tower Hamlets does not include additional new infrastructure to improve transport measures.</p>	+/-	<p>The London Plan sets out measures to meet the Mayor's target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Policies set out in Chapter 10 set out ways in which to reduce the need to travel for both existing and future developments. The Plan also sets out the ambitions of Crossrail 2 and the opportunities this may bring to Tower Hamlets.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting sustainable transport in Tower Hamlets and has therefore resulted in significant positive effects.</p>	++

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
<b>IIA8: Accessibility</b>	<p>There is no specific policy within the existing Local Plan that addresses accessibility of public transport from all social groups. However, policy S.TR1 (sustainable travel) includes indirect effects on accessibility through encouraging accessible public and active travel modes.</p> <p>The Borough is generally well connected through public transport. However, as with the transport policies, the Plan does not include specific implementation measures to ensure accessibility across the Borough.</p>	+/-	<p>Policies within Chapter 10 (Transport) aim to improve the public transport within London. Within this, measures are outlined in order to preserve accessibility for all groups, including disabled and low income users. This also includes the availability for disabled parking spaces.</p> <p>However, these policies have not specifically outlined measures of improving accessibility within Tower Hamlets. Therefore it is likely that accessibility to transport and spaces within the Borough will be preserved, but improvements are less likely to reflect the needs of the population. Therefore minor positive effects have been identified.</p>	+
<b>IIA9: Biodiversity and Natural Capital</b>	<p>Chapter 13 within the existing local plan includes policies that enhance open spaces within Tower Hamlets (S.OWS1, S.OWS2, D.OWS3, D.OWS4). These policies help to enhance biodiversity and protect open space within the Borough, including Metropolitan Open Land. This also includes improving the quality of open spaces in line with the Local Biodiversity Action Plan.</p>	+	<p>There are a number of policies within the London Plan that support the protection, enhancement and net gain in biodiversity (specifically G5, G6, G7, GG2, D8). The London Plan also includes a supplementary design guide (Urban Greening for Biodiversity Net Gain: A Design Guide<sup>17</sup>) which sets out ways in which biodiversity net gain can be achieved through new developments.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on biodiversity. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of biodiversity. Both positive and negative effects have therefore been identified.</p>	+/-
<b>IIA10: Landscape and Townscape</b>	<p>There are a number of policies (namely, S.DH1, D.DH2, D.DH6, and D.DH10) that improve the landscape and townscape of Tower Hamlets through high quality design, attractive streets, spaces and public realm; enhancing the townscapes within Tower Hamlets. Additionally, Policy S.OWS1 (Creating a network of open spaces) contributes to preserving the landscape within Tower Hamlets, including the open space and MOL within the Borough. Policy S.DH4 (Shaping and managing views) also contributes to the enhancement and protection of the Tower Hamlets views and landscape, enhancing the public realm.</p> <p>Preserving and enhancing the local landscape and townscape contributes to high quality streetscapes within the Borough and improves the current condition of the landscape and townscape. Significant positive effects are therefore identified.</p>	++	<p>The London Plan understands the pivotal role that the City's unique landscape and townscape plays in shaping its character and sense of place. The plan does not benefit from one specific landscape policy; however, it does underpin a number of policies such as D8, HC1, HC3, G1, G3 and G9. These are aimed at improving the historic and natural environment, which in turn will benefit the landscape and townscape.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on landscape and townscape. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of the local landscape and townscape. Both positive and negative effects have therefore been identified.</p>	+/-
<b>IIA11: Historic Environment</b>	<p>Policies S.DH3 (heritage and the historic environment) aims to preserve and enhance the Borough's designated and non-designated heritage assets, including</p>	+	<p>Chapter 7 of the London Plan sets out heritage and culture policies which aim to sensitively management London's heritage assets, whilst design policies aim to</p>	+/-

<sup>17</sup> London Wildlife Trust, Mayor of London, Urban Greening for Biodiversity Net Gain: A Design Guide [online] available at: [https://www.london.gov.uk/sites/default/files/urban\\_greening\\_and\\_bng\\_design\\_guide\\_march\\_2021.pdf](https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf)

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
	<p>archaeology and parks and gardens. Additionally, Policy S.DH5 (world heritage sites) safeguards the world heritage sites within the Borough (the Tower of London and Maritime Greenwich). This preserves the sites within the Borough and aims to enhance them where possible through development.</p> <p>However, the policies do not consider heritage at risk assets. Therefore minor positive effects are identified.</p>		<p>avoid harm to, the significance of London’s heritage assets and their settings. These could help to preserve and enhance the borough’s heritage assets.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on the historic environment. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of the historic environment. Both positive and negative effects have therefore been identified.</p>	
<b>IIA12: Flooding</b>	<p>Policy D.ES4 (flood risk) aims to restrict development that is located within flood zone 3a (high risk of flooding). The policy also requires a flood risk assessment for developments that are located within flood zone 2 or 3a. In addition to this, flood risk management measures are required within developments in order to mitigate flood risk from the River Thames and River Lea. Additionally, Policy D.ES5 (sustainable drainage) outlines measures to reduce the risk of surface water flooding and achieve specific run-off rates. However, the policies do not outline specific measures that should be included within developments to minimise flood risk.</p>	+	<p>Policy SI 12 (flood risk management) and SI 13 (sustainable drainage) aim to minimise and mitigate flood risk from developments. The implementation of these policies within Tower Hamlets is likely to contribute to reducing flood risk and be sufficient in minimising flood risk as a result of new developments.</p>	+
<b>IIA13: Water Quality</b>	<p>Policy D.ES6 (sustainable water and wastewater management) outlines reductions in water consumption as part of new developments (maximum of 105 litres per person per day). Additionally, developments should meet BREEAM water efficiency credits. There is also a requirement for new developments to minimise pressure on the combined water network.</p> <p>However, despite preserving water resource, this policy does not enhance water quality. Mixed positive and negative effects have therefore been identified as the existing Local Plan may be insufficient in supporting the preservation and enhancement of water quality within the Borough.</p>	+/-	<p>There are a number of policies within the London Plan that aim to protect and enhance the water environment. Most significantly is Policy SI 17 which explicitly aims to protect and enhance London’s waterways. This aims for new developments to support river restoration including opportunities to improve water quality.</p> <p>Additionally Policy SI 5 (water infrastructure) states that new development should promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, whilst Policy SI 13 (sustainable drainage) states that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the efficient use of land in Tower Hamlets and has therefore resulted in significant positive effects.</p>	++
<b>IIA14: Air Quality</b>	<p>Policy D.ES2 (Air quality), specifically, requires development to meet or exceed the ‘air quality neutral’ standard, including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles. The aim of this policy is to improve the Borough’s air quality.</p> <p>Additionally, the acknowledgement of required air quality improvements within the plan are likely to contribute to mitigating poor air quality where possible. The application of this plan is likely to be sufficient in tackling air pollution in the Borough.</p>	++	<p>Policy SI 1 (improving air quality) sets out a key criteria for dealing with poor air quality within the city. It states that new developments must not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality.</p> <p>The cross cutting nature of air quality is acknowledged within the plan, as it features in other policies such as creating a health city (GG3) public realm (D8) and protecting and enhancing London’s waterways (SI17). Policies that support a reduce need to travel and encourage an increase in walking and cycling will also benefit this objective.</p>	++

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
			The application of the London Plan policies is likely to be sufficient in tackling air pollution in Tower Hamlets and has therefore resulted in significant positive effects.	
<b>IIA15: Climate Change</b>	Policy D.ES10 (overheating) and D.ES4 (flood risk) are likely to contribute to positive effects as these policies indirectly. Climate change is likely to result in increased warming and flood events, as well as presenting an increased water requirement. Therefore, these policies are likely to help address the chronic and acute effects of climate change.	+	Policy GG6 (increasing efficiency and resilience) aims to help London become a more efficient and resilient city. This will ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.	+
<b>IIA16: Greenhouse Gases</b>	Policies within the existing Plan acknowledge the need to reduce greenhouse gases and emissions within the Borough. Specifically, Policy D.ES7 (a zero carbon borough) includes measures to reduce carbon-dioxide emissions on sites within Tower Hamlets, including within residential and non-residential developments.  However, the Plan does not include measures for localised improvements across the borough, including additional emitters. Mixed positive and negative effects are therefore identified.	+/-	Policy SI 2 (minimising greenhouse gas emissions) states that all new major development should be net zero-carbon, by reducing GHGs in operation and minimising both annual and peak energy demand in accordance with an energy hierarchy. However, the London Plan is working towards becoming a net zero city by 2050, which is 12 years longer than the council's ambition of 2038. Without localised initiatives it's unlikely that the London Plan will help to reach the Council's net zero ambitions, resulting in minor negative effects.	-
<b>IIA17: Waste</b>	There are three policies within the existing Plan that contribute to reducing waste within the Borough (S.MW1, D.MW2, and D.MW3). These policies aim to manage and minimise the waste within Tower Hamlets, identifying a need for waste reduction, and suitable waste facilities. Additionally, new waste facilities will be designed to contribute towards sustainable waste management in line with the Waste Hierarchy.	+	Policies SI 7 (reducing waste and supporting the circular economy) and SI 8 (waste capacity and net waste self-sufficiency) identify the needs for waste reduction and sustainability within London. This will aim to reduce waste and promote circular economy principles within London, managing waste and minimising where possible. Additionally, Policy SI9 (safeguarded waste sites) ensures the protection of London's waste sites.	+
<b>IIA18: Efficient use of Resources</b>	Whilst the Plan does not include a specific policy in reference to the efficient use of resources, including land, other policies are designed to indirectly positively affect resources. Policy S.SG1, as well as other policies, includes specification to utilise brownfield sites within the Borough.  The plan also seeks to utilise circular economy principles, reusing and recycling construction materials where possible (policy S.MW1, managing our waste).	+	The London Plan includes Policy GG2 which supports making the best use of land. This aims to enable development on brownfield land, avoid development on greenbelt land and MOL and where appropriate intensify development to make the best use of available site. Policy H1 (increasing housing supply) also aims to optimise the potential for housing delivery on all suitable and available brownfield sites.  The application of the London Plan policies is likely to be sufficient in supporting the efficient use of land in Tower Hamlets and has therefore resulted in significant positive effects.	++

## 7 Assessment of Site Allocations

### 7.1 Introduction

- 7.1.1. The assessment of the Local Plan sites is summarised below and presented in full in **Appendix G**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 7-1** below.
- 7.1.2. **Table 7-2** overleaf provides an overview on the performance of the Local Plan policy themes against each IIA objective and **Table 7-3** outlines significant effects based on each IIA objective. For the purpose of the IIA, significant effects are deemed to be the following:
- Significant Positive effects;
  - Significant Negative effects; and
  - Uncertain effects.
- 7.1.3. Further details on the insignificant effects i.e., minor positive, minor negative, mixed and neutral effects are detailed in **Appendix G**. The Appendix also sets out the nature of effects such as magnitude, spatial extent and duration. It should be noted that those effect recorded below are pre-mitigated effects. Details on the specific mitigation measures are included in **Appendix G**, which includes the application of proposed draft policies.

**Table 7-1 – Significance of Effect**

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0

## 7.2 Proposed Site Allocations – Summary of Effects

Table 7-2 provides an overview on the performance of the Local policy themes against each IIA objective and Table 7-3 outlines significant effects based on each IIA objective.

Table 7-2 – Overview of Proposed Site Allocations

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Bishopsgate Goods Yard	++	++	++	++	++	+	+	++	++	+/-	+/-	0	0	+/-	+	+/-	?	+
London Dock	++	++	++	++	++	+	+	++	++	+	+/-	-	0	+/-	?	?	?	+
Marian Place Gasworks and the Oval	++	++	++	++	++	+	++	++	+/-	+/-	+/-	0	0	+/-	+	+	?	+
Whitechapel South	+	++	++	++	++	?	+	+	++	+/-	+/-	0	0	+/-	-	+/-	?	+
London Metropolitan University	?	?	?	?	?	?	+	+	+	+/-	+/-	0	0	+/-	-	?	?	+
Whitechapel North	++	++	++	++	++	?	+	+	?	?	?	0	0	+/-	-	?	?	+
Brick Lane and Pedley Street	+	+	++	++	+	?	+	+	-	+/-	+/-	0	0	+/-	-	?	?	+
Bow Common Lane	+/-	+	++	++	++	+	+	++	+/-	+	-	+	+	+/-	+/-	?	?	++
Chrip Street	++	++	++	++	+	+	+	+	+	+	+	?	+	-	+	+/-	?	+
Ailsa Street	++	++	?	+	++	+	+	+	+/-	+	+/-	-	+/-	+/-	+	+/-	?	+
Leven Road	++	++	+	+	++	+	-	+	+/-	++	+/-	-	+/-	+/-	+	+/-	?	+

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Aberfeldy Estate	++	++	++	++	+	+	-	+	++	++	+	--	?	+/-	-	?	?	+
Bromley by Bow	++	++	+	+	+	+	++	++	+/-	+/-	-	--	?	+/-	-	?	?	+
Blackwall Trading Estate and Leamouth Road Depot	+	++	?	?	+	+	+	+	+/-	+/-	+/-	--	?	+/-	-	?	?	+
Hackney Wick Station	++	++	++	++	++	+	++	++	+/-	+	+	--	?	+/-	-	?	?	++
Hepscott Road	++	++	++	++	++	+	+	+	++	+/-	+/-	--	?	+/-	+	?	?	+
Sweetwater	++	++	++	++	++	+	++	++	+/-	++	+	--	?	+/-	+	?	+	++
Teviot Estate	++	++	+	+	+	+	?	+	?	+	+/-	--	?	+/-	-	?	?	+
Aspen Way	++	+	+	++	+	?	++	+	+	++	+/-	-	0	+/-	-	?	?	+
Billingsgate Market	+	?	+/-	+	+	+	+	++	-	+/-	+/-	-	-	+/-	-	?	?	+
Crossharbour	++	++	++	+	?	+	+	++	+/-	+/-	+/-	--	-	+/-	-	?	?	+
Limeharbour	+	+	+/-	++	?	+	+	+	+/-	+/-	+/-	--	-	+/-	+	+	?	+
Marsh Wall East	++	++	+	++	++	+	+	++	+/-	+/-	+/-	--	-	+/-	+	+	?	+

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Marsh Wall West	+	++	+/-	++	++	+/-	+	++	+/-	+/-	+/-	?	+/-	+/-	+	+	?	+
Millharbour	++	+	++	++	+/-	+	+	+	+/-	+/-	+/-	?	+/-	+/-	-	+	?	+
North Quay	+	++	++	++	+	++	++	++	+/-	+/-	+/-	-	-	+/-	+	+	?	+
Reuters	+	+	++	+	++	+/-	++	++	+/-	+/-	+/-	-	-	+/-	-	?	?	+
Riverside South	++	++	+	++	?	+	+	++	+/-	+/-	+/-	-	-	+/-	?	?	?	+
Westferry Printworks	+	+	+	+	?	+	-	+	+/-	+/-	+/-	-	-	+/-	?	?	?	+
Wood Wharf	++	++	+	++	+	+	++	++	+/-	+/-	+/-	+	+/-	+/-	+	+	?	+
10 Bank Street	+	+	+	+	+	+	+	+	-	+/-	?	-	-	+/-	+/-	?	?	?
Westferry/Park Place	+	+	?	?	+	+	+	+	-	+/-	--	--	-	+/-	+/-	?	?	?

**Table 7-3 – Summary of Significant Effects**

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA1: Population &amp; Equalities</b>	19	0	1	<p>Significant positive effects have been identified for 19 proposed sites. Generally, these sites provide at least 500 new homes per site, including 40% affordable homes and the development of wheelchair adaptable homes. In addition, these sites provide additional retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. These sites also have good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</p> <p>Uncertain effects have been identified for the London Metropolitan University site as these units will only benefit only benefit students and the delivery may compromises the ability to deliver other priorities, in particular affordable housing and facilities which will benefit the wider community. However, the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
<b>IIA2: Human Health</b>	21	0	2	<p>Significant positive effects have been identified for 21 proposed site allocations. These sites all provide a housing provision improving health and have the potential to include new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. These sites will reduce levels of health inequalities and provide new facilities, improving physical and mental health and wellbeing and reduce levels of loneliness. They will ensure that the needs of all groups will be met both now and in the future.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Uncertain effects have been identified for two sites – Billingsgate Market and London Metropolitan University. Generally, these sites have existing good access to health services, however there are high levels of health deprivation. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>IIA3: Economy &amp; Town Centres</b>	16	0	3	<p>Significant positive effects have been identified for 16 sites. These sites are well located close to existing town centres and include additional retail development spaces. Generally, this also includes public realm improvements at the ground and platform level. These sites will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p> <p>Uncertain effects have been identified for three proposed sites (London Metropolitan University, Ailsa Street and Blackwall Trading Estate). Generally, the details of these developments are currently unknown. However, there could be potential to provide a mixed-use development which may include retail offering, helping to improve the viability of the town centre.</p>
<b>IIA4: Employment &amp; Skills</b>	20	0	2	Significant positive effects upon employment have been identified for 20 sites. Generally, this is where sites are well located close to existing employment areas, such as the City Fringe Activity Area, Central Activity Zone, or Isle of Dogs Activity Area. These sites are also likely to include employment space as well as retail. This will likely increase employment opportunities.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Uncertain effects have been identified for two proposed sites (London Metropolitan University and Blackwall Trading Estate). The details of these developments are currently unclear. However, there is potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve employment opportunities.
<b>IIA5: Housing</b>	14	0	5	<p>Significant positive effects have been identified for 14 sites. Generally, these sites all provide at least 500 homes per site, helping towards meeting LBTH's housing target. These sites also include at least 35% affordable homes, including wheelchair accessible homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.</p> <p>Uncertain effects have been identified for five sites (London Metropolitan University, Limeharbour, Crossharbour, Riverside South and Westferry Printworks). Generally, this has been attributed where limited information is currently known on the affordability, accessibility, size, type and tenure of homes.</p>
<b>IIA6: Crime &amp; Safety</b>	1	0	5	<p>The majority of sites have resulted in minor positive effects upon crime and safety. This has been detailed in full in <b>Appendix G</b>.</p> <p>One site has resulted in significant positive effects upon crime and safety (North Quay). This site is expected to deliver improvements to public realm and active frontages. This is likely to improve natural surveillance within the site and in turn</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				<p>improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles.</p> <p>Uncertain effects have been identified for five sites (Whitechapel South, London Metropolitan University, Whitechapel North, Brick Lane and Pedley Street, and Aspen Way). It is currently unclear if designing out crime principles will be applied as part of these developments. However, developing these sites from their existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.</p>
<b>IIA7: Sustainable Transport</b>	8	0	1	<p>The majority of sites have resulted in minor positive effects upon sustainable transport. This has been detailed in full in <b>Appendix G</b>.</p> <p>Significant positive effects have been identified for eight sites (Marian Place Gasworks and the Oval, North Quay, Wood Wharf, Reuters and Bromley by Bow). These sites generally have very good access to sustainable transport modes, and high PTAL scores of between 4 and 6a. These sites also include the development of improved cycle and pedestrian access.</p> <p>Uncertain effects have been identified for one site (Teviot Estate) as this site has average access to public transport and it is not clear whether additional sustainable transport will be included within the development of the site.</p>
<b>IIA8: Accessibility</b>	15	0	0	<p>The majority of sites have resulted in minor positive effects upon accessibility. This has been detailed in full in <b>Appendix G</b>.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Significant positive effects have been identified for 15 sites. Generally, these sites have existing good access to transport facilities and services and include the provision for additional improvements to accessibility, including active travel permeability and improvements to wayfinding.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	5	0	2	<p>Five sites have resulted in significant positive effects due to their regard for biodiversity and inclusion of green infrastructure and landscaping, which are expected to provide a significant net gain in biodiversity.</p> <p>The Whitechapel North and Teviot Estate resulted in uncertain effects upon biodiversity as it is currently uncertain whether these sites will have adverse effects on local habitats, or if the sites will meet the required 30% net gain as set out within the Local Plan.</p>
<b>IIA10: Landscape &amp; Townscape</b>	4	0	1	<p>Four sites have resulted in significant positive effects upon landscape and townscape (Sweetwater, Aberfeldy Estate, Teviot Estate and Leven Road). Generally, these sites will have a positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area. Active frontages and green landscapes may also be created and maintained.</p> <p>The Whitechapel North site has resulted in uncertain effects as at this stage the design details of developments are unknown, however, it is assumed that the developments may improve townscape and landscape setting.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA11: Historic Environment</b>	0	1	2	<p>Significant negative effects on the historic environment have been identified for the Westferry/Park Place site. This site is located in close proximity to a number of heritage assets, including archaeological priority areas, conservation areas, and a Grade 2 listed gate. There is potential for the loss of the Grade 2 listed gate and buried archaeology as a result of development at this site.</p> <p>Uncertain effects have been identified for two sites (10 Bank Street and Whitechapel North). Generally, there is potential for these sites to temporarily adversely affect local heritage assets. However, design details are currently unclear and there is potential for enhancements to the public realm which may improve the setting of the local historic environment.</p>
<b>IIA12: Flooding</b>	0	12	3	<p>In total 12 sites have resulted in significant negative effects for flooding. These sites are all located within areas of flood zone 3 and flood risk areas and there are no detailed flood risk mitigation measures outlined for the developments at this stage.</p> <p>Three sites (Chrip Street, Marsh Wall West and Millharbour) have resulted in uncertain effects on flooding. These sites are located within flood risk areas and it is currently unclear whether these sites will include flood risk mitigation measures.</p>
<b>IIA13: Water Quality</b>	0	0	7	<p>Uncertain effects upon water quality have been identified for seven sites, which are located within close proximity to watercourses. It is currently unclear if any measures to mitigate against water quality impacts will be included within development.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA14: Air Quality</b>	0	0	0	All proposed site allocations have resulted in mixed positive and negative effects upon air quality. This has been detailed in full in <b>Appendix G</b> .
<b>IIA15: Climate Change &amp; Resilience</b>	0	0	3	Three sites (Mariane Place Gasworks and the Oval, Riverside South, and Westferry Printworks) have resulted in uncertain effects on climate change and resilience. Generally, these sites have low overall climate and heat risks, and have some resilience to climate change. However, not all climate resilience measures are known at this stage.
<b>IIA16: GHG Emissions</b>	0	0	20	Uncertain effects have generally been identified for 20 sites where there is potential for significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. However, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
<b>IIA17: Waste</b>	0	0	31	The majority of sites have resulted in uncertain effects on waste. Demolition, excavation, and construction are likely to result in the generation of a significant amount of waste. However, at this stage it is not clear if existing buildings and structures will be re-used or recycled and whether recycled materials will be supported as part of construction.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA18: Efficient use of Land and Resources</b>	3	0	2	<p>The majority of sites have resulted in minor positive effects upon efficient use of land and resources. This has been detailed in full in <b>Appendix G</b>.</p> <p>Three sites (Sweetwater, Hackney Wick Station, and Bow Common Lane) have resulted in significant positive effects on land use. These sites are on previously developed land and will support high density housing and mixed-use development which will help to make the best use of the land within the Borough.</p> <p>Uncertain effects have been identified for two sites (10 Bank Street and Westferry/Park Place). These sites are predominantly on previously developed land, however the density of housing is not currently known nor is it clear whether sustainable use of materials will be encouraged.</p>

## 7.3 Alternative Site Allocations

- 7.3.1. The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 7.3.2. The proposed site alternatives include those sites that are developable but do not meet the 500 minimum capacity targets of the proposed site allocations. There are 12 sites in total. These sites have the potential to come forward as windfall sites in the future if the proposed site allocations above do not provide adequate housing numbers. The sites have therefore, been assessed in the same level of details as the proposed allocations and the summary of effects is presented below.

## 7.4 Summary of Effects – Alternative Allocations

- 7.4.1. The assessment of alternative sites has resulted in a higher proportion of significant negative effects compared to the proposed site allocations and are less likely to sustainably support development. These effects have been identified for IIA15 (climate change and resilience), IIA12 (flooding), IIA11 (historic environment), IIA8 (accessibility), and IIA7 (sustainable transport).
- 7.4.2. Generally, sites that are located within flood zone 3 have resulted in significant negative effects upon IIA12 (flooding). Similarly, sites located within flood zone 3 and that have high climate and heat risks have resulted in significant negative effects on IIA15 (climate change and resilience).
- 7.4.3. Additionally, a small number of sites have the potential to result in damage or loss of heritage assets located in the site boundaries (IIA11). Significant negative effects have been identified for these sites.
- 7.4.4. Minor negative effects have also been identified where schemes are located in close proximity to priority habitats (IIA9). Development here is likely to result in disturbance to these habitats and species within them.
- 7.4.5. There are a larger proportion of uncertain effects associated with alternative sites when compared to preferred sites. This has largely been identified for IIA1 (population and equalities), IIA2 (human health), and IIA5 (housing) where it is currently unclear what the provision of homes at sites will entail, including the number of homes, affordability and adaptability of homes.
- 7.4.6. A number of uncertain effects have also been identified across IIA objectives where the nature of development at sites is currently unclear, and the provision of additional services is unknown.

Table 7-4 – Overview of Alternative Allocations

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Neptune Wharf	?	?	?	+	?	?	?	+	?	+	?	?	?	+/-	?	?	?	+
Hamlet Industrial Estate	+/-	?	?	?	+/-	?	?	+	?	?	?	--	?	+/-	--	?	?	+
Millharbour South	+	++	+	++	?	+	+/-	+	?	+	+/-	-	?	+/-	--	?	?	+
Orchard Wharf	?	?	+	?	?	+	--	--	-	+/-	+/-	--	?	+/-	?	?	?	+
Tobacco Dock	?	?	+	+	?	+	+	+	?	+/-	--	--	0	+/-	--	?	?	+
Canada Square/Churchill Place	?	?	+	+/-	?	?	-	+	0	-	-	--	?	+/-	+/-	?	?	+/-
London Chest Hospital	?	?	?	?	?	+	+	+	?	+/-	--	0	?	+/-	+/-	?	?	+
LEB Building	?	?	+	?	?	+	+	+	?	+/-	+/-	0	0	+/-	+/-	?	?	+
72-90 Crisp Street	?	?	+	+	?	+	+	+	0	+/-	+/-	--	0	+/-	--	?	?	+
Tower Hamlets Car Pound	?	?	+	?	?	+	+	+	?	+/-	+/-	0	0	+/-	?	?	?	+
Anchor Retail Park	+/-	?	-	+/-	-	?	+	+	0	?	-	0	0	+/-	+/-	?	?	+/-
Republic Estate	+/-	?	+/-	+/-	-	?	-	?	0	?	-	0	0	+/-	+/-	?	?	+/-

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Watney Market	?	?	?	?	?	?	+	+	?	?	?	0	0	+/-	?	?	?	?
Devons Road	+	?	+	?	?	+	+	+	-	+/-	+/-	0	0	+/-	+/-	?	?	+
Hertsmere House	?	?	+	+	?	?	-	+	-	?	+/-	--	0	+/-	+/-	?	?	+
Samuda Estate	?	?	?	?	?	?	?	+	-	?	?	--	-	+/-	--	?	?	?

**Table 7-5 – Summary of Significant Effects – Site Alternatives**

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA1: Population &amp; Equalities</b>	0	0	10	Alternative sites have largely resulted in uncertain effects on population and equalities. Generally, these uncertain effects have been attributed where the provision of homes does not meet the borough’s housing target and there are uncertainties surrounding site developments. These uncertainties include how many housing units will be affordable and adaptable, and whether additional community facilities will be provided at the site.
<b>IIA2: Human Health</b>	1	0	15	<p>The Millharbour South alternative site has resulted in significant positive effects on human health. The site is well connected to healthcare and community facilities, and is likely to lead to additional community facilities and open spaces, improving health and wellbeing of the local community.</p> <p>Uncertain effects have been identified for 15 alternative sites. Generally, this is as there is potential for the site to increase pressure on existing healthcare and community facilities and it is unclear if additional provisions will be included within development.</p>
<b>IIA3: Economy &amp; Town Centres</b>	0	0	4	<p>The majority of alternative site allocations have resulted in minor positive effects on economy and town centres, this is detailed in full in <b>Appendix G</b>.</p> <p>Four site alternatives have resulted in uncertain effects on economy and town centres (Neptune Wharf, Hamlet Industrial Estate, London Chest Hospital and Watney Markey). There is potential for these sites to include mixed-use</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				development, providing employment and/or retail space. However, this is currently uncertain.
<b>IIA4: Employment &amp; Skills</b>	1	0	8	<p>Millharbour South has resulted in significant positive effects on employment and skills. The site is well located close to employment opportunities, and the area is amongst the 30-50% most deprived areas. The site also has the potential to include additional employment opportunities. Therefore, providing improved opportunities for employment.</p> <p>Uncertain effects have been identified for eight sites. These sites are generally within good access to existing employment areas, however, there is potential for the inclusion of additional employment facilities within the proposed sites although this is currently unclear.</p>
<b>IIA5: Housing</b>	0	0	12	Thirteen alternative sites have resulted in uncertain effects on housing. This has been attributed where housing provisions fall below the borough's targets and the affordability, accessibility, size, type and tenure of homes is unclear.
<b>IIA6: Crime &amp; Safety</b>	0	0	8	Eight alternative sites have resulted in uncertain effects upon crime (Neptune Wharf, Hamlet Industrial Estate, Canade Square/Churchill Place, Anchor Retail Park, Republic Estate, Watney Market, Hertsmere House, and Samuda Estate). These sites have limited detail as to whether designing out crime principles will be applied as part of developments, or whether there will be improvements to the public realm.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA7: Sustainable Transport</b>	0	1	3	<p>Orchard Wharf has resulted in significant negative effects upon sustainable transport. The site is not well located for public transport use and has a PTAL score of between 0 and 1b. This is likely to increase the need for residents to travel by car to access local services and facilities. It is also unclear if any additional public transport provision will be proposed as part of the site.</p> <p>Uncertain effects have been identified for Neptune Wharf, Samuda Estate and Hamlet Industrial estate. Despite these sites having a PTAL score of 2, and access to public transport, it is unclear if improvements to sustainable transport access will be included within development.</p>
<b>IIA8: Accessibility</b>	0	1	1	<p>Orchard Wharf has resulted in significant negative effects upon accessibility as the site has a PTAL score of between 0 and 1b. Therefore, there is potential for the exclusion of social groups who rely on public transport.</p> <p>Republic Estate has resulted in uncertain effects as the site has average access to facilities and service. However, at this stage it is not known if any accessible provision will be included as part of the site.</p>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	0	0	8	<p>Eight sites have resulted in uncertain effects on biodiversity. None of the alternative sites will result in the direct loss of habitats, but they could disturb nearby sites, habitats and species. At this stage, no details have been provided on the provision of green infrastructure and/or open space which could enhance biodiversity, or whether BNG targets will be met on site.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA10: Landscape &amp; Townscape</b>	0	0	6	Hamlet Industrial Estate, Anchor Retail Park, Watney Market, Hertsmere House, Samuda Estate and Republic Estate have all resulted in uncertain effects on landscape and townscape. They are located in areas which have low landscape and townscape values, but currently, the design details for these sites are unknown and whether there will be any inclusion of green spaces or significant enhancements to the public realm.
<b>IIA11: Historic Environment</b>	0	2	4	<p>Both Tobacco Dock and London Chest Hospital have resulted in significant negative effects upon the historic environment. Both these sites have the potential to disturb local heritage assets, and result in the loss of heritage assets as a result of development at these sites.</p> <p>Uncertain effects have been identified for Neptune Wharf, Watney Market, Samuda Estate and Hamlet Industrial Estate as these at this stage it is not clear whether development will include measures to enhance and restore the local historic environment, or whether sensitive design will be implemented.</p>
<b>IIA12: Flooding</b>	0	7	1	Seven alternative sites have resulted in significant negative effects upon flooding (Hamlet Industrial Estate, Orchard Wharf, Tobacco Dock, Canada Square/Churchill Place, 72-90 Chrisp Street, Hertsmere House and Samuda Estate). These sites are all located within areas of flood zone 3 and flood risk areas, and there are no detailed flood risk mitigation measures outlined within the developments at this stage.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
<b>IIA13: Water Quality</b>	0	0	6	Uncertain effects upon water quality have been identified for a number of sites located near to water bodies as it is currently unclear if any measures to mitigate against water quality impacts will be included within development. There is potential that surface water runoff from construction could affect water quality.
<b>IIA14: Air Quality</b>	0	0	0	No alternative sites have resulted in significant or uncertain effects upon air quality. All alternative sites have resulted in mixed positive and negative effects upon air quality, detailed in <b>Appendix G</b> .
<b>IIA15: Climate Change &amp; Resilience</b>	0	5	4	<p>Five sites have resulted in significant negative effects upon climate change and resilience (Hamlet Industrial Estate, Millharbour South Tobacco Dock, Samuda Estate and 72-90 Chrisp Street). Generally, these sites all have medium-high or high overall climate risk and heat risk ratings as well as being at risk of flooding meaning that they have a diminishing resilience to climate change. No climate resilience measures are known at this stage.</p> <p>Four sites have resulted in uncertain effects on climate change and resilience (Neptune Wharf, Orchard Wharf, , Tower Hamlets Car Pound and Watney Market). Generally, these sites have low overall climate and heat risks, and have some resilience to climate change. However, not all climate resilience measures are known at this stage.</p>
<b>IIA16: GHG Emissions</b>	0	0	16	All alternative sites have resulted in uncertain effects upon GHGs. For all developments, there are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether developments will utilise renewable energy sources or low carbon heat networks once operational.
<b>IIA17: Waste</b>	0	0	16	All alternative sites have resulted in uncertain effects upon waste. The demolition, excavation, and construction of sites are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land and Resources</b>	0	0	2	<p>No alternative sites have resulted in significant effects upon efficient use of land and resources. The majority of alternative sites have resulted in minor positive effects, with three sites resulting in mixed positive and negative effects, detailed in <b>Appendix G</b>.</p> <p>Uncertain effects have been identified for Watney Market and Samuda Estate as the density of housing is not currently known nor is it clear whether the sites will encourage sustainable use of materials.</p>

## 8 Findings from Other IIA Assessments

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### 8.1 Introduction

- 8.1.1. This section presents the findings from the EqIA, HIA and HRA assessments. Further details on these assessments can be found in **Appendix H (EqIA)** **Appendix I (HIA)** and the HRA Screening Report, which has been published separately.

### 8.2 EqIA Findings

- 8.2.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the borough. The policies aim to address a wide range of issues, identified by the key themes within the EqIA baseline.
- 8.2.2. The main protected characteristic groups that will particularly benefit include:
- Age – older people who have reduced mobility and require access to health and other services. Also, children who are likely to benefit from air quality improvements that numerous policies look to achieve;
  - Disability – people with a variety of disabilities will benefit from a more accessible environment; and
  - Deprivation – people from low-incomes who require access to employment, education and housing and people with underlying health issues.
  - Sex, Gender reassignment and Race – women and girls, gender diverse people, and people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.
- 8.2.3. Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:
- Age, Disability and Pregnancy and maternity – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups.
  - Deprivation – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.
- 8.2.4. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:
- Religion or belief;
  - Sexual orientation; and
  - Marriage and civil partnerships.

## 8.3 HIA Findings

8.3.1. The HIA assessed the NLP policies and considered their impact on the key determinants of health. These have been detailed below:

- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Community policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads, which could contribute to a worsening of air quality.
- **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, contributing to increased road traffic noise in the area. Improvements to entertainment venues and the night-time economy will also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction and developments throughout the borough, reducing the levels of nuisance felt to those living in close proximity to developments.
- **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for our Community theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation. This could have positive effects for many vulnerable groups, predominantly working aged adults (18-64) and those who are homeless.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the borough. In particular, the provision and protection of affordable workspaces will aid in supporting new and emerging economic sectors in the borough. Additional town centre developments and an increase in shops, entertainment venues and food and drink facilities under the NLP is also likely to reduce unemployment in the borough, having positive effects for the unemployed and low-income residents in the borough.
- **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access to education and training. Upskilling opportunities will be particularly beneficial to the health of young people throughout the borough.
- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated

to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces policy theme include safety measurements such as appropriate signage of public areas, good lighting and surveillance. The promotion of a safe living environment will contribute positively to the physical and mental wellbeing of all residents.

- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the borough will have suitable access to community facilities and shops. Additionally, policies under the Community Infrastructure policy theme support development proposals to maximise opportunities for the provision of high-quality community facilities. Access to services will improve the health of elderly residents, improving health and reducing loneliness.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel, from commuting to work to walking for pleasure. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population. Further, the inclusion of town centres within the 15-minute neighbourhood principle may improve physical activity rates.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policy theme. This includes the protection and enhancement of existing biodiversity throughout the borough as well as new provisions to contribute a 30% BNG. The maintenance of green infrastructure and accessible open spaces contributes to improving mental wellbeing by providing spaces for physical activity and social interaction. Green infrastructure could be further promoted through additional requirements under the Homes for the Community policy theme.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

## 8.4 HRA Findings

### Stage 1 - HRA Screening (Regulation 18)

- 8.4.1. There are no Habitats sites within LBTH's administrative area, however there are two Habitats that fall within the identified 7.2km Zone of Influence of the borough boundary and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.
- 8.4.2. A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HF1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.
- 8.4.3. Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment was considered necessary to satisfy the requirements of the Habitats Regulations as the Local Plan emerges.
- 8.4.4. It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging LBTH Local Plan when considered with other strategic plans based on the findings of the screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.

### Stage 2 - Appropriate Assessment (Regulation 19)

- 8.4.5. At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 8.4.6. Policy BO2 was subject to further consultation with the LBTH and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 8.4.7. Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1 resulted in a conclusion when taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold.
- 8.4.8. Air quality considerations for Lee Valley SPA and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway, but also that the qualifying feature (Bittern) for which air quality is indicated as a possible pressure or threat is not anticipated to be present within the components of the SPA/Ramsar within the Zone of Influence of LBTH.

- 8.4.9. Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plan<sup>1819</sup>.
- 8.4.10. Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways between LBTH (as opposed to 'as the crow flies' distances), the reasons for visits to Epping Forest as derived from published visitor surveys, and the presence of more extensive and equally attractive green spaces closer to LBTH for those activities.
- 8.4.11. Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements within the Zone of Influence of LBTH (a component of the overall SPA and Ramsar in the Lee Valley) being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access.
- 8.4.12. The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 8.4.13. For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified. In two instances this has included consideration of mitigation, but these measures are already in place and functioning, or proposed to address in-combination effects as part of strategic infrastructure delivery, not reliant on specific actions undertaken by LBTH.

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<sup>18</sup> Thames Water, Water Resource Management Plan, 2019 [online] available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

<sup>19</sup> Thames Water, Revised Draft Water Resources Management Plan, 2024 [online] available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources>

## 9 Cumulative Effects

### 9.1 Introduction

- 9.1.1. The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Cumulative effects arise, for instance:
- Where several individual policies and sites have a combined effect on an objective; or
  - Where several policies and sites each have insignificant effects but together have a significant effect.
- 9.1.2. The significance of cumulative effects resulting from a range of activities, or multiple incidences of one activity, may vary based on factors such as the nature of the proposed sites and policies and the sensitivity of the receiving communities and environment.
- 9.1.3. This section therefore presents the findings of the following:
- Consideration of how different proposed policies and sites within the LBTH may interact and cause cumulative effects on a receptor (Intra-project effects); and
  - How the proposed policies and sites within LBTH could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-project effects).

### 9.2 Intra-Project Effects

- 9.2.1. The IIA assessment of both policies and strategic sites drew out potential intra-project cumulative effects. These have been identified in **Table 9-2** below.
- 9.2.2. **Table 9-1** below outlines the key to effects for intra-project cumulative effects.

**Table 9-1 – Key to Cumulative Effects**

Effect	Key
Positive cumulative effect	+
Negative cumulative effects	-
Mixed cumulative effects	+/-
No overall cumulative effects	0

Table 9-2 - Intra-Project Effects Summary

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
<b>IIA1: Population and Equalities</b>	+	+	+	+	+	+	+	+	+	+	0	<p>There is potential for positive cumulative effects if multiple developments were to arise from the Local Plan. These developments are likely to provide improved infrastructure for current and future populations within Tower Hamlets.</p> <p>However, pressure could be placed on existing services due to increased population demands arising from multiple developments, leading to cumulative negative effects. There is also potential for a cumulative increase in disturbance to existing local residents.</p> <p>Additionally, the Local Plan promotes inclusive design, particularly through the people places and spaces, town centres, and community infrastructure policies, improving access to all social groups inclusively.</p>
<b>IIA2: Human Health</b>	+/-	+	+	+	+	+	+	+	+	+	+	<p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward due to the increased strain on existing community health facilities and the potential increased demand from new populations.</p> <p>However, community infrastructure policies and some of the proposed developments include the provision of new community facilities and services, such as health provisions and public leisure facilities. Therefore, this could result in positive cumulative effects on health and wellbeing.</p> <p>The provision and improvements to the public realm and open spaces, as part of some of developments and policies, would result in positive effects on the health and wellbeing of the population in Tower Hamlets.</p>
<b>IIA3: Economy</b>	+	+	+	0	+	+	+	+	0	+	0	<p>There is the potential for positive effects on the economy if multiple large-scale developments were to come forward. These developments will provide a substantial amount of office space and jobs, as well as housing provisions, which will help to improve connectivity between employment centres and the housing markets. Multiple site allocations well located to retail centres will likely improve footfall in these areas, improving their vitality.</p> <p>Developments are further supported by the Local Plan's economy and town centre policies which aim to support existing office, industrial and warehouse spaces. This coupled with potential new developments could help to attract further inward investment and provide employment opportunities.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
<b>IIA4: Employment</b>	+	+	+	+	0	+	+	+	0	0	+	There is potential for positive cumulative effects on employment if multiple employment and economic developments were to come forward. These developments also have the potential to increase access to public transport which will help communities within Tower Hamlets to be better connected to jobs, services and facilities.
<b>IIA5: Housing</b>	+	+	+	+	+	0	0	0	0	0	+	There is potential for positive effects if multiple housing developments within Tower Hamlets were to come forward. These developments will help to meet Tower Hamlets housing target of 52,125 new homes across the borough between 2023-2038 and increase the provision of affordable homes, reducing the significant barriers to housing prevalent in many areas of the borough. There is also potential for cumulative improvements to housing quality and standards across the borough, by taking into account the needs of different groups in the community Adequate provision of wheelchair adaptable homes have the potential to raise accessibility standards and promote inclusion and community cohesion.
<b>IIA6: Crime and Safety</b>	+	+	+	0	+	0	+	+	+	+	+	<p>It is assumed that all new developments will be built to a high standard of safety. There may be potential for positive cumulative effects positive from developing the land to provide housing and public realm improvements, particularly if designing out crime principles are applied.</p> <p>There is potential for negative cumulative effects where the provision of student rooms is brought forward simultaneously, especially in areas with existing student accommodation. Adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour, is of particular concern.</p> <p>Policies support high quality design and landscaping which can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.</p>
<b>IIA7: Transport</b>	+/-	+	+	+	+	+	+	+	+	+/-	+	<p>There is the potential for positive cumulative effects on sustainable transport if multiple large scale housing developments were to come forward within Tower Hamlets.</p> <p>Most new developments will help to improve access to sustainable transport through improvements to pedestrian and cycle connections, making active travel more appealing to the population within Tower Hamlets. Access to public transport (tube, bus, and rail) will also be improved as part of the developments.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												<p>This is further supported by the Local Plan policies which will ensure that new development is located in suitable areas where the transport requirements can be met in a sustainable manner, and which actively encourages travel by sustainable modes.</p> <p>The maximisation of parking in some locations with poor PTAL scores (as per Policy MC4) could see a cumulative increase in private vehicle use particularly at those sites which are located in areas with low PTAL scores such as Ailsa Road, Leven Road and Aberfeldy Estate.</p>
<b>IIA8: Accessibility</b>	+	+	+	0	+	+	+	+	+	+	0	<p>There is the potential for positive cumulative effects on accessibility if multiple developments were to come forward. The Local Plan supports enhancements to connectivity and accessibility of public transport, as well as walking and cycling. People, places and spaces and town centres in particular includes measures for accessible public spaces, improving access to all groups inclusively</p>
<b>IIA9: Biodiversity and Natural Capital</b>	-	+	+/-	+	+	-	0	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on biodiversity if multiple large scale housing developments and employment developments were to come forward. Given that a large number of housing allocations are located within Sites of Importance for Nature Conservation, there's potential for a cumulative loss of these sites.</p> <p>Depending upon the number and type of options selected and their proposed location, there is potential for a cumulative loss of land, which could lead to damaged and fragmented habitat connectivity.</p> <p>However, there is the potential for positive cumulative effects. There is potential for the development of additional green spaces, and the inclusion of green infrastructure within developments, that may provide biodiversity enhancements and comply with upcoming Biodiversity Net Gain requirements. Natural capital enhancements are possible through the connection of green spaces and protection of habitats linking population centres which may otherwise be lost or severed through a lack of maintenance or through other development.</p>
<b>IIA10: Landscape and Townscape</b>	+/-	+	+/-	+	+	+/-	+	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on landscapes and townscapes if multiple housing developments were to come forward in close proximity to parks and open spaces and areas with high townscape values. Neighbouring sites within areas designated for the management of views could result in adverse effects on the skyline. During construction of these new developments there is the potential for disturbance to the setting and tranquillity of these areas, temporarily harming the visual amenity.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												<p>However, positive cumulative effects may arise due to good design of the proposed housing developments, other developments such as employment, and improvements to the public realm, parks and open spaces and the natural environment. In combination, such improvements could enhance the landscape and townscape character over the long term.</p>
IIA11: Historic Environment	-	+	+/-	+	+	+/-	+/-	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on the historic environment if multiple developments were to come forward in close proximity to heritage assets. During construction of these new developments there is the potential for disturbance to the historic environment due to noise, vibration and temporary reductions in air pollution (dust soiling). During operation, these developments have the potential to negatively impact the setting of heritage assets if not sensitively designed.</p> <p>There is also potential for the loss of heritage assets (designated, non-designated and buried archaeology) through land take for housing developments.</p> <p>However, positive cumulative effects may arise due to the historically sensitive design of developments to fit in with the setting of any surrounding designated heritage assets. This will be further supported by People, Places and Spaces policies, which preserves and enhances the historic environment. Additionally, cumulative improvements to the public realm improve the setting of heritage assets. Proposals that prioritise the restoration of existing listed buildings will cumulatively maintain the built heritage for future generations, preserving Tower Hamlets' cultural and aesthetic history.</p> <p>Policies may also result in a cumulative improvement in air quality, and reduction in the degradation of heritage assets.</p>
IIA12: Flooding	+/-	+	+/-	+	+	-	0	0	+	0	0	<p>There is potential for cumulative increases in flood risk arising from housing developments, urban intensification and additional employment developments, due to increases in hard standing and sealed surfaces. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, particularly for those sites located within flood zone 3..</p> <p>Drainage measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide, particularly through the implementation of sustainable development, climate change and environmental sustainability and natural environment policies. The application of sustainable drainage</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												systems (SuDS) across multiple schemes, especially in combination with green infrastructure (GI), can mitigate the impacts of flooding as a nature-based solution (NbS), contributing to urban resilience and climate change adaptation.
IIA13: Water Quality	-	+	0	+	+	0	0	0	+	-	-	<p>There is potential for cumulative increases in water transportation as a result of movement and connectivity and reuse, recycling and waste policies, increasing water pollution and decreasing water quality. There is also potential for decreases in water quality from housing developments as a result of increases in surface water runoff and impacts on surface water and groundwater, particularly from physical alteration as a result of development from housing allocations.</p> <p>Water quality measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide, particularly through the implementation of sustainable development, climate change and environmental sustainability and natural environment policies.</p> <p>There are potential cumulative benefits arising from delivering the local plan, clean and green future, people places and spaces, and biodiversity and open space policies through promoting water efficiency and improving water quality.</p>
IIA14: Air Quality	+/-	+	+/-	+	+	+/-	+	+	+	+/-	+/-	<p>Temporary negative cumulative effects have the potential to result during the construction phase, if multiple housing or employment developments, with overlapping construction periods, were to come forward. Construction of these developments may temporarily reduce the air quality and worsen air pollution from construction plant emissions, dust and construction traffic.</p> <p>However, if these developments are located with good connectivity to public transport facilities it will enable more people to use public transport modes instead of the use of a private car, helping to improve air quality. Improvements to pedestrian and cycle connections may further reduce reliance on private cars and encourage low-emission sustainable and active travel, in turn providing health benefits. Therefore, there is also the potential for positive cumulative effects to result if multiple housing developments were to come forward.</p> <p>The maximisation of parking in some locations with poor PTAL scores (as per Policy MC4) could see a cumulative increase in private vehicle use particularly at those sites which are located in areas with low PTAL scores such as Ailsa Road, Leven Road and Aberfeldy Estate. This may lead to</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												Policies set out within Delivering the Local Plan, Clean and Green Future, People, Places and Spaces, Town Centres, Community Infrastructure, Biodiversity and Open Space, and Movement and Connectivity themes all help to improve air quality, through measures including low or zero emission transport, increasing accessibility to public transport, increase green infrastructure which will help to reduce air pollution.
IIA15: Climate Change	+/-	+	+	+	+	0	0	0	+	0	0	<p>The addition of increased use of hard standing surfaces as part of the proposed housing developments will increase surface water runoff. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, particularly for those developments located within flood zone 3.</p> <p>However, a number of policies within delivering the local plan, homes for the community, clean and green future, people places and spaces, and biodiversity and open space help to improve climate resilience through encourage the incorporation of SUDs which will help to reduce overall flood risk within the Borough. These policies also aim to manage heat risk, both internally and externally. These policies will help to provide a cumulative increase in resilience to climate change and the urban heat island (UHI) effect within the borough.</p>
IIA16: Greenhouse Gases	+/-	+	+/-	+	+	-	0	-	+	+/-	+/-	<p>If multiple developments were to come forward there is the potential for these developments to be resource intensive and have high levels of embodied carbon.</p> <p>However, policies set out in clean and green future, people places and spaces, delivering the local plan, and biodiversity and open space all support a transition towards reducing GHG emissions through reductions in energy use, vehicle reliance, or low levels of embodied carbon. These alongside the support for sustainable transport modes, could cumulatively reduce GHGs within the borough.</p>
IIA17: Waste	+/-	+	-	+	+	-	0	-	0	-	+	<p>The Local Plan supports the re-use of materials and the minimisation of waste within developments, predominantly through the Reuse, Recycling and Waste policies. The implementation of circular economy principles and the re-use of materials within developments also contributes to positive cumulative effects.</p> <p>There is potential for cumulative increases in waste produced by demolition, excavation, and construction resulting from developments arising from the Local Plan, including housing and employment developments</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA18: Efficient use of Resources	+/-	0	+/-	+	+	+	+	+	+/-	-	0	<p>The Local Plan promotes the efficient use of land and resources where possible, in a way that makes as much use of previously developed land and brownfield sites as possible. The majority of site allocations are located on either previously developed land or brownfield sites, resulting in positive cumulative effects. However, there are a number of new allocations where there is potential for land take to occur.</p> <p>Some other developments which may arise out of the Movement and Connectivity and Homes for the Community, could result in developments which may not occur on previously developed land or brownfield sites and could result in a cumulative loss of more valuable land, including MOL.</p>

### 9.3 Inter-Project Effects

9.3.1. **Table 9-3** below outlines the sources of potential inter-cumulative effects, whilst **Table 9-4** details the cumulative effects identified for each of the IIA Topics in relation to these policies and plans. This uses the same key to effects as set out in **Table 9-1** above.

**Table 9-3 – Sources of Inter-Cumulative Effects**

Policy or Plan	Plan Details
The London Plan, 2021	<p>The London Plan is the Spatial Development Strategy for Greater London and acts as a framework and a vision for the development of London over the next 20-25 years.</p> <p>The London Plan supports major development of London’s growth corridors and Opportunity Areas (areas that will see the most significant change), which have the potential to deliver a substantial number of new homes and jobs in London. The Plan sets out three Opportunity Areas (associated with Crossrail 2) which have the potential to cause cumulative effects in the borough. The boundaries of these Opportunity Areas are yet to be defined. The borough also sits within the Crossrail 2 South Growth Corridor.</p>
Crossrail 2	<p>Crossrail 2 is a proposed rail route in the South East, running from nine stations in Surrey to three in Hertfordshire, providing a new North–South rail link across Greater London, and helping to reduce congestion.</p> <p>The route would free up space on the existing congested SW mainline and would enable more local services to central London that bypass the most congested stations. Trains would likely run south west of Wimbledon serving lines to Epsom, Chessington South, Hampton Court and Shepperton.</p>
Liverpool Street Station	<p>Liverpool Street Station is located in the neighbouring City of London. The station is the busiest nationally, with up to 135 million people using the station annually. Passengers already experience overcrowding, poor accessibility, and limited connectivity. The proposed transformation of the station will deliver greater accessibility and a world-class passenger experience.</p>
55 Bishopsgate	<p>The scheme comprises a 63 storey and 22 storey mixed-use buildings, that will feature a free to visit public roof top, 103,000 sq metres of workspace, auditorium, meeting spaces and spaces to support events and pop-ups. At 284 meters tall, 55 Bishopsgate will become the third tallest tower in the Square Mile.</p>

Policy or Plan	Plan Details
One Exchange Square	<p>Located in the City of London, the 13-storey building will deliver 428,000 sq ft of high-quality workspace and 15,000 sq ft of retail, fronting both Bishopsgate and the newly redesigned Exchange Square.</p>
Mayor of London, Mayor's Transport Strategy, 2021/22	<p>The Mayor's Transport Strategy sets out policies and proposals to reshape transport in London over the next two decades (up to 2038).</p> <p>This sets out plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. Its aim is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041.</p> <p>The Strategy introduces a Healthy Streets approach. This aims to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.</p>
Neighbouring Local Plans	<p>Local plans in neighbouring boroughs (City of London, Hackney and Newham) influence cross-boundary development improvements.</p> <p>The plans include:</p> <ul style="list-style-type: none"> <li>■ City of London draft Local Plan (adoption June/July 2025)</li> <li>■ Hackney Local Plan 2033 (adopted July 2020)</li> <li>■ Newham Local Plan Review (Regulation 19)</li> <li>■ London Legacy Development Corporation Local Plan 2020-2036 (adopted July 2020)</li> </ul>
Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	<p>Local Transport Plans and Implementation Plans enable Local Authorities to plan for transport in their areas. They can identify both strategic policy and implementation plans for delivering this policy. Therefore, they identify policy options for implementing transport improvements, including different modes of transport. They also prioritise a number of areas and schemes for development over the plan period.</p> <p>Local Implementation Plans in neighbouring boroughs (City of London, Hackney and Newham) influence cross-boundary transport improvements and major road networks.</p> <p>The plans include:</p> <ul style="list-style-type: none"> <li>■ Tower Hamlets Transport Strategy 2019-41</li> <li>■ City of London Transport Strategy, 2019</li> <li>■ Hackney Transport Strategy 2015-2025</li> <li>■ Newham Local Implementation Plan</li> </ul>

Table 9-4 - Inter-Project Effects Summary

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA1: Population and Equalities	+/-	+	+	+	+	+	+/-	+	<p>There is a potential for negative cumulative effects to result if multiple developments were to come forward across the borough and within neighbouring local authorities due to the increased strain on existing community facilities due to the increased demand from new populations.</p> <p>Positive effects would result from the provision of new community facilities, employment opportunities and services as part of these major developments. New transport schemes (Crossrail 2) will improve access and connectivity to community facilities and services, especially for the people who cannot drive or do not have access to a private car.</p> <p>If multiple housing developments within the borough were to come forward, more people will be placed closer to community facilities and employment opportunities. This will result in positive cumulative effects.</p>
IIA2: Human Health	+/-	+	+	+	+	+	+/-	0	<p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward, due to the increased strain on existing community health facilities resulting from the increased demand from new populations.</p> <p>The provision and improvements to the public realm and open spaces, as part of some of these housing developments, will result in positive effects on the health and wellbeing of the population in the region. This is because access to greenspace can provide better mental health and wellbeing outcomes including reduced levels of depression, anxiety and enhanced quality of life, as well as helping to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution and excessive noise.</p>
IIA3: Economy	+	+	+	+	+	+	+	+	<p>There is the potential for positive effects on the economy if multiple large-scale developments were to come forward, such as those in opportunity areas. These developments will provide a substantial amount of office space and jobs, as well as housing provisions, which will help to improve connectivity between employment centres and the housing markets.</p> <p>Greater cumulative connectivity will result through investments in sustainable transport developments such as Liverpool Street Station redevelopment and Crossrail. This will help communities to gain greater access to jobs, services and facilities. Access to</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									activities provides the potentiality for people to participate in education, work, social, leisure, cultural, etc. Greater connectivity to Tower Hamlets may also bring about greater tourism opportunities.
<b>IIA4: Employment</b>	+	+	+	+	+	+	+	+	<p>There is the potential for positive effects on employment if multiple large-scale developments were to come forward, such as those in opportunity areas. These developments will provide a substantial amount of office space (particularly 55 Bishopsgate and One Exchange Square) and jobs, which will help to improve connectivity between employment centres.</p> <p>Greater cumulative connectivity will result through investments in sustainable transport developments such as Liverpool Street Station redevelopment and Crossrail. This will help communities to gain greater access to jobs, services and facilities.</p>
<b>IIA5: Housing</b>	+	+	0	0	0	0	+	0	Significant positive effects will result if multiple housing developments, such as those in opportunity areas, were to come forward in combination with Tower Hamlets' proposed development sites. These developments will help to meet Borough specific housing targets set out in their local plans and increase the provision of affordable housing.
<b>IIA6: Crime and Safety</b>	+	0	+	+	+	+	+	0	<p>It is assumed that all schemes and projects will be built to a high standard of safety. There may be potential for positive cumulative effects from developing the land to provide housing and public realm improvements, particularly if designing out crime principles are applied.</p> <p>Using high quality design and landscaping can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.</p>
<b>IIA7: Transport</b>	+	+	+	+	+	+	+	+	There is the potential for positive cumulative effects on sustainable transport if multiple transport schemes were to come forward, such as Crossrail 2 and neighbouring local transport/implementation plan. These developments will help to increase and improve the offering and connectivity of sustainable transport modes in the region.
<b>IIA8: Accessibility</b>	+	+	+	+	+	+	+	+	There is the potential for positive cumulative effects on accessibility if multiple transport schemes were to come forward, including Crossrail 2 and neighbouring local transport/implementation plan. These developments will help to increase and improve

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									the accessibility within Tower Hamlets and the wider London area, offering increased connectivity. Additionally, there is potential for positive cumulative effects as a result of accessibility to all users, including disabled and low-income users who may rely on public transportation through improved transportation.
IIA9: Biodiversity and Natural Capital	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>Potential for cumulative loss, damage or fragmentation of statutory and non-statutory sites and habitats if multiple developments, across similar timeframes were to come forward. Although it is assumed that protected species would be mitigated at a project level, there are wider impacts on biodiversity.</p> <p>Positive cumulative effects may result through BNG over multiple development plans. These are likely to be driven by the London Plan 2021 policies where green infrastructure should be incorporated in design to increase biodiversity and if biodiversity is lost on site this should be mitigated by improving the quality or management of the rest of the site or deliver off-site compensation of better biodiversity value.</p> <p>Further positive cumulative effects will result from the development of sustainable transport schemes (Crossrail 2). This will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions, journey times and congestion, resulting in increased tranquillity and air quality.</p>
IIA10: Landscape and Townscape	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	The provision of public realm improvements through the London Plan, Local Plans and transport/implementation plans could help to increase and improve the open space offering as well as the setting of the borough's townscape and landscape. This will result in positive cumulative effects; however, multiple developments (in particular tall buildings in neighbouring boroughs) could result in a cumulative loss of open spaces, and obstructions to key views.
IIA11: Historic Environment	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is the potential for temporary negative cumulative effects on the historic environment if multiple housing developments and transport schemes were to come forward. During construction of these developments there is the potential for disturbance to the historic environment due to noise and air pollution.</p> <p>Positive cumulative effects will arise due to the historically sensitive design of the proposed housing developments to fit in with the setting of any surrounding designated heritage assets and Conservation Areas, including World Heritage Sites.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									<p>Positive cumulative effects will also result from the development of sustainable transport schemes (Crossrail 2). This will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions, journey times and congestion, resulting in increased tranquillity and setting of the historic environment.</p> <p>Further potential positive effects could result due to the improved access to the historic environment by the new transport schemes which could present opportunities to generate activity and vitality.</p>
IIA12: Flooding	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>The addition of increased use of hard standing surfaces as part of the proposed opportunity areas and transport developments will increase surface water runoff, therefore, resulting in potential negative effects on flooding.</p> <p>However, the proposed developments are likely to incorporate permeable surfaces and SUDs which will help to reduce flood risk if implemented county-wide. These are likely to be driven by the London Plan 2021 policies regarding flood risk management.</p>
IIA13: Water Quality	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is potential for cumulative increase in surface water runoff and flood risk, and impacts on surface water and groundwater, particularly from physical alteration as a result of development. Drainage and water quality measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide.</p>
IIA14: Air Quality	+	+/-	+/-	+/-	+/-	+	-	+/-	<p>Temporary negative cumulative effects have the potential to result during the construction phase, if multiple developments were to come forward. Construction of these developments may reduce the air quality through an increase in particulate matter and dust.</p> <p>Positive cumulative effects will result through the development of sustainable transport schemes (Crossrail 2). In combination with new Local Plan sites and policies, this will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions and improving air quality. Further positive cumulative effects will result from the reduction in journey times and congestion on the highway network.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
<b>IIA15: Climate Change</b>	+	+	+	+/-	+/-	+	+/-	+/-	<p>Climate change adaptation measures are likely to be specific to each development, but there may be cumulative benefits if implemented across multiple plans (as set out in the London Plan, Mayor's Transport Strategy and neighbouring Local Plans).</p> <p>Temporary negative cumulative effects have the potential to result during the construction phase if multiple housing and commercial developments were to come forward. Construction of these developments may increase levels of greenhouse gas emissions through the embodied carbon associated with the construction and maintenance of the development. Investment in sustainable transport schemes, such as Crossrail 2, will have positive cumulative effects on climate change due to the reduction of private car use and therefore, greenhouse gas emissions.</p> <p>Positive cumulative effects have the potential to result if multiple housing and commercial developments were to come forward, due to the provision of public realm improvements and enhancements to biodiversity as part of the design. Further positive effects may result from low carbon and energy efficient design, which is resilient to the effects of climate change. Climate change adaptation measures are likely to be specific to each development,</p>
<b>IIA16: Greenhouse Gases</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There may be cumulative benefits from transport initiatives (including Crossrail 2 and proposals set out in Mayor's Transport Strategy, and neighbouring transport/implementation plans) and low carbon developments (as set out in the London Plan and neighbouring local plans) in reducing greenhouse gases, however, increased development is also likely to increase transport related greenhouse gas emissions, particularly where this leads to increases in vehicular traffic as well as embodied carbon due to development.</p>
<b>IIA17: Waste</b>	+/-	-	-	-	-	-	+/-	+/-	<p>There is potential for negative cumulative effects on waste as a number of large-scale projects, such as HS2 and Crossrail 2 coupled with development in the borough, could lead to a large cumulative use of resources and production and disposal of waste during construction. There is potential for developments to encourage the sustainable use of resources and encourage re-use and recycling initiatives to minimise waste going to landfill.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA18: Efficient use of Resources	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is potential for negative cumulative effects on the efficient use of land as a number of large-scale projects, such as Crossrail 2, Liverpool Station, 55 Bishopsgate, One Exchange Square and Tower Hamlets Opportunity Area coupled with other development in the borough, could lead to a large cumulative loss of land, some of which may not be brownfield land. However, positive cumulative effects could arise if the majority of the of proposed developments are situated on brownfield sites.</p>

## 10 Mitigation, Enhancements and Monitoring

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### 10.1 Mitigation and Enhancement Measures

- 10.1.1. Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan. The measures are known as ‘mitigation’ measures. Mitigation measures include both proactive avoidance of adverse effects and actions taken after potential effects are identified.
- 10.1.2. The mitigation measures proposed in **Table 10-1** are designed to avoid or reduce the effects identified as potentially negative through the policy assessments on the IIA Objectives. The table also includes enhancement measures, that aim to optimise positive impacts and enhance sustainability. Both enhancement and mitigation measures do not always sit within the control of the Local Plan and can be achieved through other plans and strategies.
- 10.1.3. Policy and site-specific mitigation measures have been included within **Appendix F and G**.

**Table 10-1 – Proposed Mitigation and Enhancement Measures**

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA2 - Human Health	The loss of community facilities to make way for site allocations should be avoided. Where a loss can't be mitigated, these should be reprovioned elsewhere.	Inclusion within preferred Local Plan policies Project level design and assessment Community engagement
IIA1 - Population and Equalities IIA2 - Human Health	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.	Project level design and assessment as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA4 – Employment and skills	Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities IIA2 - Human Health IIA6 – Crime and Safety	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.	Inclusion within Local Plan policies Project level Community Safety Assessment, EqIA and HIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA7 – Sustainable Transport IIA8 - Accessibility	<p>Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p> <p>The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.</p>	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application Tower Hamlets Transport Strategy 2019-2041 The Mayor’s Transport Strategy
IIA1 - Population and Equalities	Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
<p>IIA2 – Health and Wellbeing</p> <p>IIA6 – Crime and Safety</p>	<p>be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p> <p>Community engagement</p>
<p>IIA1 - Population and Equalities</p> <p>IIA10 - Landscape and Townscape</p>	<p>Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p>
<p>IIA3 – Economy and Town Centres</p>	<p>Where sites are located within or in close proximity to local and neighbourhood shopping centres/ parades it is imperative that development does not detrimentally impact on the vitality of the designated centre.</p>	<p>Project level design and assessment</p> <p>Community engagement</p>
<p>IIA3 – Economy and Town Centres</p>	<p>The loss of businesses should be avoided. Where it cannot be avoided, discussions with owners should be undertaken to ensure suitable alternative locations are identified and/or adequate</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Community engagement</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA4 – Employment and Skills	<p>compensation is provided particularly where businesses may need to be temporarily closed or relocated during construction.</p> <p>Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p>	Project level design and assessment
IIA4 – Employment and skills	Where new development comes forward in close proximity to existing shop frontages and businesses, there’s a need to ensure that they can remain open and maintain their existing business hours.	<p>Inclusion within Local Plan policies</p> <p>Project level design and assessment as part of subsequent EIA/ planning application</p>
IIA6 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn’t currently have its own standalone policy. Given the high levels of crime in some areas of the borough, reductions in crime could be better supported by planning policies.</p>	<p>Incorporation within the Local Plan policies</p> <p>Project level design and assessment as part of subsequent EIA/ planning application</p>
IIA9 – Biodiversity and Natural Capital	<p>Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on biodiversity.</p> <p>A Lighting Strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p>	<p>Inclusion within Local Plan policies</p> <p>Project level design and assessment (including noise assessments/ surveys)</p> <p>Lighting Strategy</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA9 – Biodiversity and Natural Capital	For those sites that incorporate existing green space, Phase 1 habitat surveys should be undertaken to identify any habitats and species.	Project level assessment
IIA10 - Landscape and Townscape	<p>Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.</p> <p>As outlined in the draft Tall Buildings SPD<sup>20</sup> Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).</p>	<p>Scheme level design and planning application</p> <p>Application of the Tall Buildings SPD</p>
IIA10 - Landscape	New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.	Historic Landscape Characterisation

<sup>20</sup> London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
and Townscape IIA11 - Historic Environment	Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. Development proposals in designated views should comply with London Plan Policy HC4.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 - Historic Environment	Promoters and designers should liaise closely with Tower Hamlets and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity.  Where developments are being built and/or improved within, or close proximity to designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 - Historic Environment	Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 – Historic Environment	Characterisation work should be undertaken to understand the potential impact of site allocations on historic places and inform assessments of an area’s capacity to accommodate development.  Site specific studies, such as archaeological desk-based assessment and fieldwork, may also be necessary to provide adequate information.	Historic Landscape Characterisation Archaeological desk based assessment

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA10 - Landscape and Townscape IIA11 - Historic Environment	Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes.	Historic Landscape Characterisation Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application
IIA10 - Landscape and Townscape	Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.  As outlined in the draft Tall Buildings SPD <sup>21</sup> Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).	Scheme level design as part of subsequent EIA/ planning application

<sup>21</sup> London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA14: Air Quality	A Dust Management Plan should be compiled prior to demolition and construction of new sites.	Project level Construction Environmental Management Plan (CEMP)
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions	Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation.  This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation methods, such as solar panels, to reduce the carbon emissions of the site.	Project level design and assessment as part of subsequent EIA/ planning application
IIA12 – Flood Risk	Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken.  Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change. This could include features such as sustainable urban drainage solutions (SuDs), permeable paving and natural engineering such as tree planting.	Project specific transport plans/assessments as part of subsequent EIA/ planning application  Incorporation within the Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA12 – Flooding	Flood Risk Assessments should be undertaken for all developments located in Flood Zone 2 or 3. The inclusion of SuDS should be implemented where developments are located in flood zones.	Project level design and assessment as part of subsequent EIA/ planning application
IIA13 – Water Quality IIA18 – Waste	Vessels used to facilitate the movement of waste will need to adhere to the Maritime and Coastguard Agency Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008 and other best practice to minimise pollution and effects on water quality.	Project level design and assessment as part of subsequent EIA/ planning application
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions IIA17 – Waste IIA18 – Efficient use of resource	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure.  Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.	Project level design and assessment as part of subsequent EIA/ planning application  CEMP/ OEMP

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA17 – Waste IIA18 – Efficient use of resource	Proposed sustainable transport infrastructure such as cycle lanes, bus lanes and footpaths, should where appropriate, prioritise the reallocation of the highway network.	Project level design and assessment as part of subsequent EIA/ planning application  Tower Hamlets Transport Strategy 2019-2041
IIA17 – Waste IIA18 – Efficient use of resource	A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).	Project level design and assessment – CEMP and OEMP

## 10.2 Monitoring Measures

- 10.2.1. The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.
- 10.2.2. The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:
- IIA1 and IIA2: The effects of a growing population on community facilities and services;
  - IIA5: The number of affordable and adaptable housing provided;
  - IIA9: The number of new developments achieving biodiversity net gain;
  - IIA10: The potential effects on key views;
  - IIA12: Flood risk of new development;
  - IIA16: Levels of embodied carbon from new development; and
  - IIA18: Levels of waste generations on new developments.
- 10.2.3. It should be noted that these uncertain effects are generally where limited scheme information is currently available.
- 10.2.4. **Table 10-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above. Targets have either been taken from the preferred Local Plan or the London Plan. These are subject to change as the plan develops.

**Table 10-2 – Proposed Monitoring Measures**

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
IIA1 and IIA2: The effects of a growing population on community facilities and services	<p>The number of new healthcare and community services provided.</p> <p>Ratio of patient-to-staff numbers at GP practices</p>	No targets included as part of the Local Plan or London Plan
IIA5: The number of affordable and adaptable housing provided	<p>The number/ percentage of affordable homes being delivered within the borough.</p> <p>The number/ percentage of adaptable homes or specialist accommodation being delivered within the borough.</p>	<p>Policy HF2 of the Local Plan:</p> <ul style="list-style-type: none"> <li>■ Deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units;</li> <li>■ Deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and</li> <li>■ Deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split.</li> </ul> <p>Policy D7 of the London Plan:</p>

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
		<ul style="list-style-type: none"> <li>Delivery of at least 10% of dwellings meet Building Regulation requirement M4(3)<sup>22</sup> 'wheelchair user dwellings'</li> </ul>
IIA9: The number of new developments achieving biodiversity net gain	The number of new developments achieving biodiversity net gain	<p>Policy BO4 of the draft Local Plan:</p> <p>To deliver a minimum 2.5 biodiversity unit per hectare increase or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline</p>
IIA10: The potential effects on key views	Number of tall building applications granted planning permission within key view areas	No targets included as part of the Local Plan or London Plan
IIA11: Potential negative effects from new developments on heritage assets	<p>Number of developments within a conservation area</p> <p>Number of applications granted planning permission contrary to advice from Historic England.</p>	No targets included as part of the Local Plan or London Plan

<sup>22</sup> HM Government, The Building Regulations, Access to and Use of Buildings (M), 2011 [online] available at: [https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR\\_PDF\\_AD\\_M1\\_2015\\_with\\_2016\\_amendments\\_V3.pdf](https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
IIA12: Flood Risk	Number of Environment Agency objections to planning applications.	No targets included as part of the Local Plan or London Plan
IIA16: Levels of embodied carbon from new development.	The number of development proposals that meet London’s Energy Transformation Initiative (LETI) 2020 best practice embodied carbon emission targets	Policy CG4 of the draft Local Plan: <ul style="list-style-type: none"> <li>■ Domestic buildings should achieve embodied carbon limits of 500kg CO2/m<sup>2</sup> or less; and</li> <li>■ Non-domestic buildings should achieve embodied carbon limits of 600kg CO2/m<sup>2</sup> or less.</li> </ul>
IIA18: Uncertain effects of waste generations on new developments	<p>The amount of construction and demolition waste going to landfill (through Site Waste Management Plans or BREEAM Infrastructure)</p> <p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the borough</p>	As per Policy SI 7 of the London Plan: <ul style="list-style-type: none"> <li>■ Zero biodegradable or recyclable waste to landfill by 2026</li> <li>■ Meet or exceed the municipal waste recycling target of 65% by 2030</li> <li>■ Meet or exceed the targets for each of the following waste and material streams:               <ul style="list-style-type: none"> <li>• a) construction and demolition – 95% reuse/ recycling/ recovery</li> <li>• b) excavation – 95% beneficial use</li> </ul> </li> </ul>

# 11 Recommendations

- 11.1.1. This section sets out the recommendations identified throughout the IIA assessment. These have been taken from the IIA Report, HIA, EqIA and HRA. It should be noted that these are different from the mitigation measure outline in **Section 11** above, as they focus on potential changes to the Local Plan, rather than measures identified in response significant effects.
- 11.1.2. Some of these changes have been made to the Local Plan since the Regulation 18 consultation, whilst some additional measures from the preferred plan have since been identified. Some recommendations fall out of scope of the Local Plan and may be delivered by other plans and strategies.
- 11.1.3. **Table 11-1** below outlines these recommendations.

**Table 11-1 – IIA Recommendations**

Item	Recommendation	Source Document
Policy HF1	<p>If using mandatory ballots, residents need to be informed and engaged in the process of change for it to be a meaningful process. It is suggested that resources are allocated to allow assistance with the co-design of schemes with the community.</p> <p>Where engagement is low, measures should be explored to increase this and low engagement should not form a barrier to schemes being approved. It could be beneficial to use consultants for this exercise who are experienced in working with groups where engagement may be low.</p>	EqIA
Policy CG4	<p>Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.</p> <p>Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.</p>	EqIA

Item	Recommendation	Source Document
Policy CG6	Part 8 could be reworded to <i>'Nature based solutions such as natural drainage systems and planted landscapes...'</i>	IIA Policy Assessment Appendix F
Policy CG9	Policy CG9 could benefit from including the promotion of public or active travel modes within the policy, rather than just stating electric vehicles or sustainable movement patterns.	IIA Policy Assessment Appendix F
Policy PS5	For Part G, it may be more inclusive to include all local groups and genders rather than specifically women. Policy supporting text could also include further statistics on LGBTQIA+ communities as it is currently quite focused on male and female genders. Additional reference could be made to the Tackling Violence Against Women and Girls Strategy (2021) and Inclusive Spaces and Places for Girls and Young People, An Introduction for Local Government (2023).	IIA Policy Assessment Appendix F
Policy PS1, PS3 and PS4	These policies could incorporate elements of climate resilient design. This could include specific aspects such as rainwater and flood attenuation, SuDs, permeable paving, green roofs etc. Reference could also be made to urban creep.	IIA Policy Assessment Appendix F
Policy PS1	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.	EqIA/ HIA
Policy PS2	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.	EqIA/ HIA

Item	Recommendation	Source Document
	Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.	
Policy PS3	PS3 touches on efficiency as part of design which could be strengthened by inclusion (either within the policy or supporting text) on what type of efficiency measure these could include i.e. water efficient measures, energy efficient measures etc.	IIA Policy Assessment Appendix F
Policy PS9	Shopfronts act as key sites to reduce sensory overload for the neurodivergent population of the borough. Enhancement of appearance should not compromise the accessibility of neurodivergent people.	EqIA
Policy PS10	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.	EqIA/ HIA
Policy EG1	This policy could benefit from including new employment space to provide a range of diverse employment opportunities, from a range of sectors.	IIA Policy Assessment Appendix F
Policy TC2	This policy could benefit from including accessibility requirements for town centres under 4 (b).	IIA Policy Assessment Appendix F
Policy TC7	More emphasis should be placed on ensuring that night time uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy	IIA Policy Assessment Appendix F EqIA

Item	Recommendation	Source Document
	TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.	
Policy CI1	The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.	EqIA
Policy CI2	<p>the explanation of Part 2 could benefit from including further explanation as to how inclusive design can improve access to disabled users and those with mobility issues.</p> <p>Policy CI2, Part 2 could also benefit from including the promotion of schemes to provide access to low-income groups.</p>	IIA Policy Assessment Appendix F
Policy BO1	<p>Part b could be changed to "maintain and enhance" the open character of MOL</p> <p>Part d (ii) could be amended to include safety measures, such as lighting and clear lines of sight.</p>	IIA Policy Assessment Appendix F
Policy BO2	<p>Accessible surfacing should be considered as part of the policy for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.</p>	EqIA/ HIA
Policy BO4	This policy should also make reference to the requirements of BNG under the Environment Act 2021 and Defra's Biodiversity Metric. Part 2 of the policy is quite complicated and some of the text could be moved to the supporting text.	IIA Policy Assessment Appendix F

Item	Recommendation	Source Document
Policy BO6	<p>Part 2 (b) could include mention of suggested barriers to tackle barriers to inclusion and equality.</p> <p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p>	<p>IIA Policy Assessment Appendix F</p> <p>EqIA/ HIA</p>
Policy BO7	<p>Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.</p>	EqIA/ HIA
Policy RW2	<p>Policy RW2 could benefit from acknowledging and implementing circular economy principles within the development of new waste sites.</p>	<p>IIA Policy Assessment Appendix F</p>
Policy MC2	<p>The policy could benefit from including mention of how sustainable transport can improve access to those on low-incomes.</p>	<p>IIA Policy Assessment Appendix F</p>
Policy MC4	<p>This policy should reconsider the maximisation of car parking, and focus on improving sustainable transport links where PTAL scores are low, rather than encourage further use of private vehicles. This will disproportionately affect those groups (such as low income groups) who may not have access to private vehicles.</p>	<p>IIA Policy Assessment Appendix F</p> <p>EqIA</p>
Policy MC4	<p>Policy should ensure that cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes as per the London Cycling Design Standards<sup>23</sup>.</p>	EqIA

<sup>23</sup> Transport for London, London Cycling Design Standards, 2014 [online] available at: <https://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf>

Item	Recommendation	Source Document
	<p>Management should protect priority bays to maintain accessibility for protected groups.</p> <p>Policy should ensure that EV charging points should adhere to the British Standards Institution’s Electric vehicles Accessible charging – Specification (PAS 1899:2022)<sup>24</sup></p>	
Homes for the Community	<p>It should be noted that the Decent Home Standard is currently applicable to the social rented sector whilst the Decent Homes Standard in the private rented sector is undergoing consultation.</p> <p>More information could be provided on what the policies mean by 'sustainable' residential development i.e., does this include renewable energy regeneration, use of sustainable materials, well located to sustainable transport etc.</p>	IIA Policy Assessment Appendix F
Policy HF1	Like Policy HF6, HF1 should also ensures that developments employ high quality design and is sympathetic to local character and heritage.	IIA Policy Assessment Appendix F
Policy DV6	The policy could incorporate community engagement within the policy. It is implied within the supporting text but the important role it plays in adding social value to new developments isn't overly clear.	IIA Policy Assessment Appendix F

<sup>24</sup> British Standards Institution’s Electric vehicles Accessible charging – Specification (PAS 1899:2022) [online] available at: <https://www.bsigroup.com/en-GB/our-services/events/webinars/pas-1899-launch/#:~:text=PAS%201899%3A2022%20is%20a, and%20indicators%20to%20be%20provided.>

Item	Recommendation	Source Document
All Sites	Where possible, further details should be provided on the proposed Site Allocations to ensure a more accurate assessment. This includes quantum and types of housing, percentage of affordable housing as well as additional community facilities.	IIA Site Assessment Appendix G
Bishopsgate Goods Yard Housing Allocation	The 5-a-side football pitches should be re-provisioned elsewhere in the borough, to avoid a loss in community facilities.	IIA Site Assessment Appendix G

## 12 Next Steps

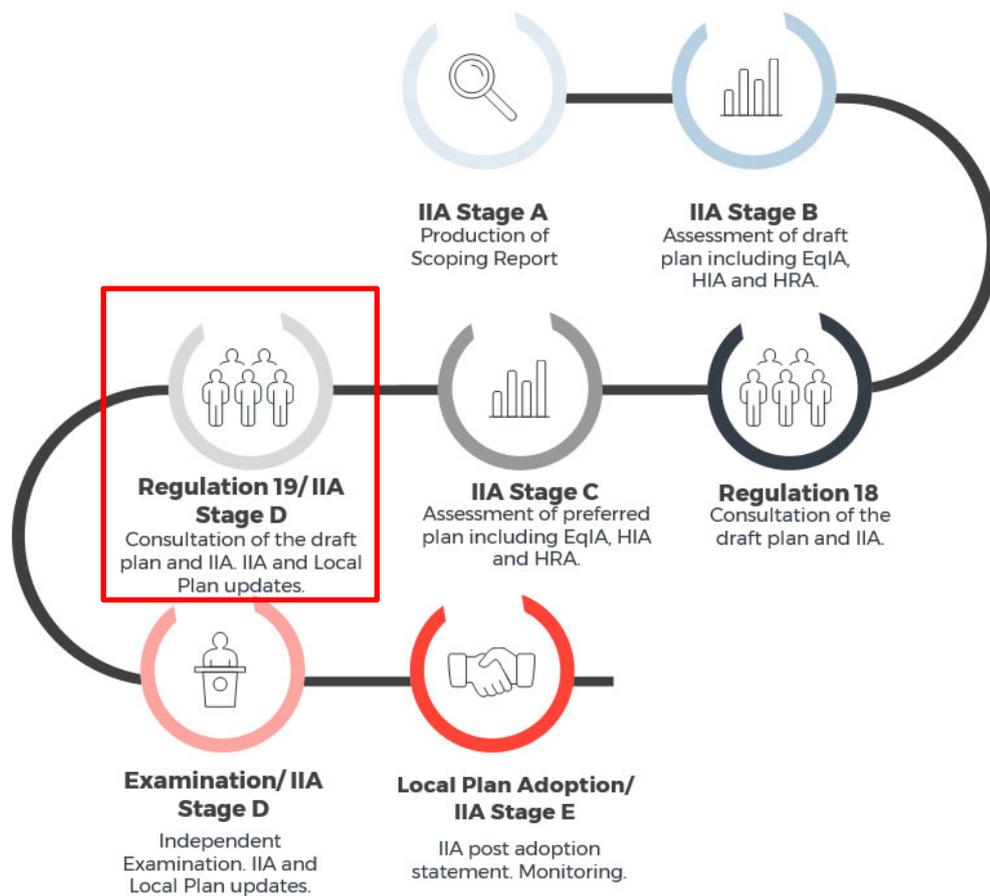
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- 12.1.1. LBTH is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 12.1.2. This IIA Report will be issued to consultees for consultation alongside the draft Local Plan (Regulation 19 Consultation) in Summer 2024.
- 12.1.3. An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 12-1** below.

**Table 12-1 – Indicative Local Plan and IIA Timetable**

IIA/ Local Plan Stages	Timescales
SA Report (IIA Stage C)	Spring/Summer 2024
Regulation 19 Consultation (IIA Stage D)	Summer 2024
Examination (IIA Stage D)	Early 2025
IIA Post Adoption Statement (Stage E)	Autumn/Winter 2025

Figure 12-1 - Local Plan and IIA Stages – Next Steps



# Appendix A

## Assurance Checklist





**Table A-1** sets out the quality assurance checklist, taken from the Office of the Deputy Prime Minister’s Practical Guide to the Strategic Environmental Assessment Directive<sup>25</sup>.

**Table A-1 – Quality Assurance Checklist**

Item	Where this has been addressed
<i>Objectives and Context</i>	
The plan’s purpose and objectives are made clear.	Section 2.3 of the Environmental Report sets out the plan’s vision and objectives.
Environmental issues and constraints, including international and environmental protection objectives, are considered in developing objectives and targets	Key sustainability issues have been identified through a review of relevant plans and programmes (see Appendix E, Section 4.2 and 4.4) and analysis of baseline conditions (see Appendix D). These have informed the development of the IIA Framework presented in Section 4.4.
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate	Section 4 sets out in detail how the IIA framework has been devised.

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<sup>25</sup> Office of the Deputy Prime Minister’s Practical Guide to the Strategic Environmental Assessment Directive, 2005 [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)



Item	Where this has been addressed
Links with other related plans, programmes and policies are identified and explained.	A review of plans policies and programmes is set out in Appendix E.
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.	Section 5 tests the compatibility of the IIA framework objectives against the Local Plan’s draft vision and objectives.
<i>Scoping</i>	
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report	The statutory consultees were consulted on the Scoping Report between July and August 2023. Details of this have been provided in Section 4.1 and comments received are presented in Appendix C.
The assessment focuses on significant issues.	Key sustainability issues have been identified in the baseline analysis contained in Appendix D. Section 4.3 summarises the key sustainability issues identified.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit	Section 3.7 discusses the assumptions and limitations encountered.
Reasons are given for eliminating issues from further consideration.	No issues have been knowingly eliminated from the assessment at this stage.



Item	Where this has been addressed
<b>Alternatives</b>	
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	Section 6.3 assesses the policy alternative, which for this reflected a 'do minimum scenario' – Application of the London Plan and a 'business as usual scenario' – Application of the existing Local Plan.  Section 7.3 assess the alternative sites.
The environmental effects (both adverse and beneficial) of each alternative are identified and compared	Alternative policies and sites have both been assessed using the same criteria as the proposed policies and sites. A summary in Section 6.3 and 7.3 is provided that details their performance against the proposed allocations.
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained	Where possible, this has been highlighted within the assessment of policies and site alternatives and detailed in Sections 6.3 and 7.3.
Reasons are given for selection or elimination of alternatives.	A summary in Section 2.5, Section 6.3 and 7.3 is provided that details their performance against the proposed allocations.
<b>Baseline Information</b>	
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	Appendix D of this IIA Report presents the baseline analysis of the borough's social, economic and environmental characteristics including their likely evolution without the Local Plan.

Item	Where this has been addressed
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Section 3.7 sets out the criteria for assessing the spatial extent of effects. This has been further documented throughout the assessment in Appendix F and G.
Difficulties such as deficiencies in information or methods are explained.	Section 3.8 discusses the assumptions and limitations encountered.
<i>Prediction and evaluation of likely significant environmental effects</i>	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate	Sections 5 to 7 summarise the appraisal of the sustainability performance of the Local Plan. The Vision and Key objectives Policies and strategic sites are appraised. Detailed appraisal matrices are also provided at Appendix F (policies) and G (strategic sites and alternatives).
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	Positive and negative effects are considered within the appraisal matrices and within Sections 6 and 7. Potential effects are identified in the short, medium and long-term. The temporal scope for short-, medium- and long-term effects is defined in Section 3.7.



Item	Where this has been addressed
Likely secondary, cumulative and synergistic effects are identified where practicable.	The potential for cumulative and synergistic effects is considered in Section 9. These have also been highlighted within the assessment of policies (Appendix F) and sites (Appendix G)
Inter-relationships between effects are considered where practicable.	Inter-relationships between effects are identified in the assessment commentary, where appropriate. These have also been assessed as part of the Intra-project cumulative effects.
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds	These have been detailed in Appendix B and identified where appropriate within the commentary for assessment.
Methods used to evaluate the effects are described.	These have been detailed in Section 3.7 and Appendix B
<i>Mitigation Measures</i>	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	These have been outlined in Section 10.
Issues to be taken into account in project consents are identified.	These have been outlined in Section 10.
<i>The Environmental Report</i>	

Item	Where this has been addressed
Is clear and concise in its layout and presentation	The IIA Report is clear and concise.
Uses simple, clear language and avoids or explains technical terms	Clear non-technical language has been used throughout.
Uses maps and other illustrations where appropriate.	Figure and tables have been used to present information where appropriate.
Explains the methodology used.	Methodology is set out in Section 3.7 and the thresholds for assessment are detailed in Appendix B – Scoring Criteria.
Explains who was consulted and what methods of consultation were used.	Section 2.2 sets out the work and consultation undertaken to date. The statutory consultees were consulted on the Scoping Report between July and August 2023. Details of this have been provided in Section 4.1 and comments received are presented in Appendix C. Limited responses were received from consultees for the Regulation 18 consultation.
Identifies sources of information, including expert judgement and matters of opinion	Section 3.7 and Appendix B identify sources of information used to inform the assessment.
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	A non-technical summary has been included separately.



Item	Where this has been addressed
<i>Consultation</i>	
The SEA is consulted on as an integral part of the plan-making process	The statutory consultees were consulted on the Scoping Report between July and August 2023. This IIA Report was consulted on alongside the draft Local Plan at Regulation 18 and will be consulted on again alongside the preferred Plan at Regulation 19.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	This IIA Report was consulted on alongside the draft Local Plan and Regulation 18 and will be consulted on again as part of Regulation 19 consultation, alongside the preferred Local Plan. This will give opportunities for statutory consultees, stakeholders and members of the public to comment on the findings of the IIA.
<b><i>Decision-making and information on the decision</i></b>	
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme	Responses received to this IIA Report to date have been set out in Appendix C.
An explanation is given of how they have been taken into account.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.

Item	Where this has been addressed
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.
<i>Monitoring measures</i>	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Proposed monitoring measures are set out in Section 10.2. This details potential indicators and where possible are linked targets within the draft Local and London Plan.
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	Proposed monitoring measures are set out in Section 10.2. These are proposed for those residual significant effects – in this case these are just uncertain effects.
Proposals are made for action in response to significant adverse effects.	

# Appendix B

## Assessment Criteria



This Appendix sets out the scoring criteria which has been applied to the assessment of both the policies and sites. Table B-1 sets out the overarching approach to dealing with uncertain, neutral and positive and negative effects and Table B-2 sets out the assessment thresholds for all other effects.

**Table B-1 – Uncertain, Neutral and Positive/Negative Effects**

Significance	Scoring Criteria
Uncertain (?)	Effects are currently uncertain as more information is needed that is not currently available or it may be dependent upon implementation.
Neutral (0)	Site/ Policy would neither help nor hinder the achievement of objectives, or there is no impact pathway.
Positive and Negative (+/-)	There are opportunities for both positive and negative effects that won't cancel each other out. Effects could be different for construction and operation. Like uncertain effects this may come down to implementation.

**Table B-2 – Assessment Criteria**

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Population and Equalities	IIA1: To build inclusive communities by reducing social exclusion, promoting equity, equality and respecting diversity.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Help to reduce inequalities, particularly for those people and communities most vulnerable?</li> <li>Improve access to services, facilities and transport for all inclusively?</li> <li>Support diversity?</li> <li>Support population growth?</li> </ul>	<ul style="list-style-type: none"> <li>Population density</li> <li>IMD) Overall Deprivation</li> <li>Primary Schools</li> <li>Secondary Schools</li> <li>Higher Education</li> <li>Healthcare Provision (GP, dentists, pharmacies and hospitals)</li> <li>Children and Family Centres</li> <li>Community Centres</li> <li>Leisure Services</li> <li>Social Services</li> </ul>	Significant Positive (++)	<ul style="list-style-type: none"> <li>The policy/ site will substantially reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</li> <li>The site has existing good access to community facilities and services (predominantly G)</li> <li>It will ensure that the needs of all groups will be met both now and in the future.</li> <li>No issues identified within the EqIA.</li> </ul>
				Minor Positive (+)	<ul style="list-style-type: none"> <li>The policy/ site will actively reduce levels of inequalities.</li> <li>No new facilities are provided; however, existing facilities may be improved.</li> <li>It will ensure that the current needs of all groups are met.</li> <li>No issues identified within the EqIA, however, some recommendations/ refinements may need to be considered.</li> </ul>
				Significant Negative (--)	<ul style="list-style-type: none"> <li>The policy/ site will not be fully inclusive and excludes most minority groups.</li> <li>It will not be sufficient in meeting the needs of the local community both now and in the future and will result in a significant population growth without the facilities to support the new community.</li> <li>Some existing community facilities may be lost, with no further provision provided. Site may be located far away from existing community facilities and an area that is scored R for population density.</li> <li>No consideration has been given to the borough's changing demographic.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
					<ul style="list-style-type: none"> <li>Substantial issues are identified within the EqIA, which are not mitigatable.</li> </ul>
				Minor Negative (-)	<ul style="list-style-type: none"> <li>The policy/ site will not be fully inclusive and excludes some minority groups.</li> <li>It will be sufficient in meeting the needs of the local community now, but not necessarily in the future. Some existing facilities are located nearby.</li> <li>Limited consideration has been given to the borough's changing demographic.</li> <li>Some issues are identified within the EqIA, which are mitigatable.</li> </ul>
Human Health	IIA2: To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH's residents.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Promote healthier lifestyles?</li> <li>Increase walking and cycling?</li> <li>Improve quality, quantity and equality of access to green and blue space and increase opportunities for recreation?</li> <li>Promote health enhancing environments, behaviours and activities for local communities?</li> <li>Reduce inequalities?</li> <li>Increase inclusion and reduce loneliness?</li> <li>Help prevent risks to human health, which arise from noise and air pollution?</li> <li>Support the UK's levelling up agenda?</li> <li>Reduce the pressure of the rising cost of living?</li> <li>Increase exposure to noise and air pollution?</li> </ul>	<ul style="list-style-type: none"> <li>IMD Health Deprivation</li> <li>Life expectancy (males and females)</li> <li>Primary Schools</li> <li>Secondary Schools</li> <li>Higher Education</li> <li>Healthcare Provision (GP, dentists, pharmacies and hospitals)</li> <li>Children and Family Centres</li> <li>Community Centres</li> <li>Allotments</li> <li>Leisure Services</li> <li>Social Services</li> <li>Sports Facilities</li> <li>Areas Deficient in Nature</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site will substantially reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness.</li> <li>It will ensure that the needs of all groups will be met both now and in the future.</li> <li>No issues identified within the HIA.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site will actively reduce levels of health inequalities.</li> <li>No new facilities are provided; however, existing facilities may be improved.</li> <li>It will ensure that the current needs of all groups are met.</li> <li>No issues identified within the HIA, however, some recommendations/ refinements may need to be considered.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/ site will not be sufficient in meeting the health and wellbeing needs of the local community both now and in the future.</li> <li>It will result in a significant population growth without the facilities to support the new community.</li> <li>Site is located in an area of high loneliness and lacks access to or consideration of new facilities and services.</li> <li>Site is located in an area with high noise and air pollution.</li> <li>Some existing community facilities may be lost, with no further provision provided. Site may be located far away from existing community facilities.</li> <li>No consideration has been given to the borough's changing demographic.</li> <li>Substantial issues are identified within the HIA, which aren't mitigatable.</li> </ul>
				-	<ul style="list-style-type: none"> <li>The policy/ site will be sufficient in meeting the needs of the local community now, but not necessarily in the future.</li> <li>Some existing facilities are located nearby.</li> <li>Limited consideration has been given to the borough's changing demographic.</li> <li>Some issues are identified within the HIA, which are mitigatable.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Economy and Employment	IIA3: To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Improved connectivity between business clusters and housing markets?</li> <li>■ Help support changing retail patterns?</li> <li>■ Increase retail floorspace?</li> <li>■ Increase footfall and local spending from commuters, residents and tourists?</li> </ul>	<ul style="list-style-type: none"> <li>■ Central Activities Zone</li> <li>■ Tower Hamlets Activity Zone</li> <li>■ Primary Shopping Areas</li> <li>■ Neighbourhood Parades</li> <li>■ Primary Shopping Areas</li> <li>■ Town Centres (major, district and neighbourhood)</li> </ul>	++	<ul style="list-style-type: none"> <li>■ The policy/ site will improve and enhance connectivity between business clusters and the housing market.</li> <li>■ The policy/ site will include proposals that will improve town centre viability and support changing retail patterns.</li> <li>■ The policy/ site will provide new opportunities for a variety of different markets e.g., tourism, arts, entertainment and recreation etc.</li> </ul>
				+	<ul style="list-style-type: none"> <li>■ The policy/ site will improve connectivity between business clusters and the housing market.</li> <li>■ The policy/ site will include proposals that will support minor town centre improvements.</li> </ul>
				--	<ul style="list-style-type: none"> <li>■ The policy/ site will decrease the connectivity between business clusters and the housing market.</li> <li>■ The site/policy would result in the decline of town and local centres.</li> <li>■ The policy/ site won't provide opportunities for a variety of different markets.</li> </ul>
				-	<ul style="list-style-type: none"> <li>■ The policy/ site will indirectly decrease the connectivity between business clusters and the housing market.</li> <li>■ The site/policy would indirectly result in the decline of town and local centres.</li> </ul>
	IIA4: To ensure that residents have employment opportunities and access to training.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Increase job availability?</li> <li>■ Improve access to employment centres?</li> <li>■ Support flexible working patterns?</li> <li>■ Meet the skills needs and future demand for labour?</li> <li>■ Diversify the labour market?</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Employment (LSOA)</li> <li>■ IMD Income (LSOA)</li> <li>■ Local Industrial Location</li> <li>■ Strategic Industrial locations</li> <li>■ Employment sites</li> <li>■ Local Employment Location</li> <li>■ Higher Education</li> </ul>	++	<ul style="list-style-type: none"> <li>■ Implementation of policy will result in a significant increase in the number and diversity of jobs.</li> <li>■ Site is well located to existing employment areas, and it will include some mixed used development which will provide additional employment opportunities.</li> </ul>
				+	<ul style="list-style-type: none"> <li>■ Implementation of policy could indirectly result in an increase in employment opportunities.</li> <li>■ Site is well located to existing employment areas which will provide additional employment opportunities.</li> </ul>
				--	<ul style="list-style-type: none"> <li>■ The site/policy would result in substantial loss in job opportunities. For sites this could mean the loss of employment land for development without further employment provision being made.</li> <li>■ Site is located away from other employment areas, with no employment provision made.</li> <li>■ Result in the stagnation of the labour market.</li> </ul>
				-	<ul style="list-style-type: none"> <li>■ The site/policy would result in some loss in job and training opportunities.</li> <li>■ For sites this could mean a loss in some employment land for development with some additional employment with some additional employment opportunities being offered as part of the new development.</li> <li>■ Site is located in close proximity to other employment areas.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Housing	IIA5: To meet the housing needs of all of the borough's residents inclusively.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Help to sufficiently meet the borough's housing target?</li> <li>■ Increase affordability?</li> <li>■ Optimise proposed sites to maximise housing delivery?</li> <li>■ Reduce housing deprivation?</li> <li>■ Meet the needs of all groups inclusively (elderly residents, young families, disabled, ethnic minorities etc.)?</li> <li>■ Support those with protected characteristics (e.g., the gypsy and traveller community)?</li> <li>■ Increase the quality of existing housing stock?</li> <li>■ Reduce overcrowding?</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Barriers to housing (LSOA)</li> <li>■ House Prices (wards)</li> </ul>	++	<ul style="list-style-type: none"> <li>■ Policy/ site will help to meet the borough's housing target.</li> <li>■ Housing will be meet the needs of all groups inclusively, both now and in the future.</li> <li>■ Exceeds the NPPF affordability target of at least 10% of the total number of homes at major housing sites<sup>26</sup></li> <li>■ The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families and travellers.</li> <li>■ Policy/site will provide significant improvements to the quality of existing housing stock.</li> </ul>
				+	<ul style="list-style-type: none"> <li>■ Policy/ site will help to work towards meeting the borough's housing target.</li> <li>■ Meets the NPPF affordability target of at least 10% of the total number of homes at major housing sites.</li> <li>■ The size, type and tenure of housing takes into account different groups in the community.</li> <li>■ Policy/site will provide some minor improvements to the quality of existing housing stock.</li> </ul>
				--	<ul style="list-style-type: none"> <li>■ Policy/ site will fall significantly short of the borough's housing target.</li> <li>■ No consideration for affordable housing and site is scored R for house prices.</li> <li>■ The size, type and tenure of housing doesn't take into account different groups.</li> </ul>
				-	<ul style="list-style-type: none"> <li>■ Policy/ site will fall short of meeting the borough's housing target.</li> <li>■ Limited consideration for affordable housing.</li> <li>■ Some consideration for size, type and tenure of housing has been made but it doesn't take into account all groups inclusively.</li> </ul>
Crime and Safety	IIA6: To reduce crime and the fear of crime for all residents inclusively	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Improve safety?</li> <li>■ Ensure that residents feel safe, particularly after dark?</li> <li>■ Support designing out crime principals?</li> </ul>	<ul style="list-style-type: none"> <li>■ IMD Crime (LSOA)</li> <li>■ Crime Rate (Ward)</li> </ul>	++	<ul style="list-style-type: none"> <li>■ Policy/ site includes designing out crime principles and measures that will significantly improve levels of safety for all residents, including the safety of women and girls.</li> <li>■ Policy/ site includes measures that will improve road safety and will actively help to reduce the number of people KSI on the roads.</li> </ul>
				+	<ul style="list-style-type: none"> <li>■ Policy/ site includes measures that will indirectly improve levels of safety e.g., public realm improvements.</li> <li>■ Policy/ site includes measures that will improve road safety and will indirectly help to reduce the number of people KSI on the roads.</li> </ul>

<sup>26</sup> Major is defined as 10 or more homes or a site that has an area of 0.5 hectares or more

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<ul style="list-style-type: none"> <li>■ Reduce levels of crime derivation?</li> <li>■ Improve road safety and reduce the number of people KSI on the roads, particularly children from deprived backgrounds?</li> <li>■ Create spaces where women and girls feel safe and included?</li> </ul>		--	<ul style="list-style-type: none"> <li>■ Site may be located in an `area with high levels of crime rates and crime deprivation (R) with no plans for designing out crime principles.</li> <li>■ Policy/ site includes makes no consideration to improve road safety and reduce the number of people KSI on the roads.</li> </ul>
				-	<ul style="list-style-type: none"> <li>■ Site may be located in an area with high levels of crime rates and crime deprivation with minimal plans for designing out crime principles.</li> <li>■ Policy/ site includes makes limited consideration to improve road safety and reduce the number of people KSI on the roads.</li> </ul>
Transport and Accessibility	IIA7: To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Support the use of sustainable transport modes?</li> <li>■ Reduce demand for use of the private car and facilitate a modal shift to more sustainable modes?</li> <li>■ Support EV infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>■ Public Transport Accessibility Levels (PTAL)</li> <li>■ Bus Stops</li> <li>■ National Rail Train Station/ Tube Station</li> <li>■ National Cycle Network</li> <li>■ London Cycle Network</li> <li>■ Cycle Hire Station</li> <li>■ Cycle Superhighway</li> <li>■ EV Charge Point</li> </ul>	++	<ul style="list-style-type: none"> <li>■ Site is located within an area with existing good access to public transport (G for PTAL) and further provision is made as part of the development.</li> <li>■ Policy supports the development of sustainable transport modes contributing to a significant modal shift.</li> </ul>
				+	<ul style="list-style-type: none"> <li>■ Site is located in an area with existing good access to public transport (G for PTAL), but limited provision of new sustainable transport is made to support future population growth.</li> <li>■ Site is well located to local facilities and services allowing residents to live their lives more locally.</li> <li>■ Policy may indirectly contribute to a modal shift.</li> </ul>
				--	<ul style="list-style-type: none"> <li>■ Site has poor access to public transport (R for PTAL) and no further provision is made as part of the new development.</li> <li>■ Site is poorly located to local facilities and services and will increase the need to travel by car.</li> <li>■ Policy will directly contribute to an increase demand for private vehicle use</li> </ul>
				-	<ul style="list-style-type: none"> <li>■ Site has average access to public transport (A for PTAL), but limited provision of new sustainable transport is made to support future population growth.</li> <li>■ Site has some local facilities within walking distance, however, not all needs will be met and there may be some increased need to travel.</li> <li>■ Policy may indirectly contribute to an increase demand for private vehicle use.</li> </ul>
	IIA8: To protect and enhance access to essential services and facilities for all residents.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Improve access to services, facilities and transport?</li> <li>■ Ensure that all groups can access services</li> </ul>	<ul style="list-style-type: none"> <li>■ Public Transport Accessibility Levels (PTAL)</li> <li>■ Bus Stops</li> <li>■ National Rail Train Station/ Tube Station</li> <li>■ Primary Schools</li> <li>■ Secondary Schools</li> </ul>	++	<ul style="list-style-type: none"> <li>■ Site is located within an area with existing good access to services and facilities (predominantly scored G)</li> <li>■ Services are easily accessed by all groups inclusively.</li> <li>■ Site/ Policy supports the development of further facilities and services to meet the needs of the population both now and in the future.</li> <li>■ Policy/ site fulfils the requirements of the Healthy Streets Indicators</li> </ul>
				+	<ul style="list-style-type: none"> <li>■ Site is well located to local facilities and services allowing residents to live their lives more locally.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		and facilities inclusively? ■ Incorporate a 'Healthy Streets' approach? <sup>27</sup>	<ul style="list-style-type: none"> <li>■ Higher Education</li> <li>■ Healthcare Provision</li> <li>■ Children and Family Centres</li> <li>■ Community Centres</li> <li>■ Leisure Services</li> <li>■ Social Services</li> <li>■ Sports Facilities</li> <li>■ Primary Shopping Areas</li> <li>■ Neighbourhood Parades</li> <li>■ Primary Shopping Areas</li> <li>■ Town Centres (major, district and neighbourhood)</li> </ul>	<div style="background-color: #90EE90; width: 100%; height: 100%;"></div> <div style="background-color: #FF0000; width: 100%; height: 100%; text-align: center; color: white; font-weight: bold;">--</div> <div style="background-color: #FFD700; width: 100%; height: 100%; text-align: center; color: black; font-weight: bold;">-</div>	<ul style="list-style-type: none"> <li>■ Site/ policies do not propose any new facilities; however, existing facilities may be improved.</li> <li>■ Policy/ site fulfils some of the requirements of the Healthy Streets Indicators</li> <li>■ Site is located within an area with poor access to services and facilities (predominantly scored R)</li> <li>■ Site/ policies do not propose any new facilities or services and will not meet the needs of the population both now and in the future.</li> <li>■ Some groups may be excluded.</li> <li>■ Policy/ site works against the Healthy Streets Indicators</li> <li>■ Site has average access to facilities and services (A for PTAL), but limited provision of new facilities is made to support future population growth.</li> <li>■ Site/ policies do propose some new facilities/ services or some upgrades to existing facilities/ services, however, these may not meet the needs of all groups inclusively.</li> </ul>
Biodiversity and Natural Capital	IIA9: To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.	Will the policy or proposal: <ul style="list-style-type: none"> <li>■ Cause damage to locally and nationally designated sites through infrastructure provision, increased development, recreational pressures, traffic or maintenance?</li> <li>■ Maintain and enhance biodiversity in the borough?</li> <li>■ Seek opportunities for biodiversity for at least 10% net gain?</li> <li>■ Increase provision of ecosystem services</li> </ul>	<ul style="list-style-type: none"> <li>■ LNR</li> <li>■ NNR</li> <li>■ Priority Habitat</li> <li>■ SINC</li> <li>■ SAC</li> <li>■ SSSI</li> <li>■ SPA</li> <li>■ Green Grid Network</li> </ul>	<div style="background-color: #008000; width: 100%; height: 100%; text-align: center; color: white; font-weight: bold;">+++</div> <div style="background-color: #90EE90; width: 100%; height: 100%; text-align: center; color: black; font-weight: bold;">+</div> <div style="background-color: #FF0000; width: 100%; height: 100%; text-align: center; color: white; font-weight: bold;">--</div>	<ul style="list-style-type: none"> <li>■ Site/ policy will maintain, protect and enhance protected habitats, species and valuable ecological networks.</li> <li>■ Site/ policy will achieve &gt;10% BNG</li> <li>■ Support and enhance habitat connectivity</li> <li>■ Site is located away from any national/ local designations (predominantly G)</li> <li>■ HRA doesn't identify any potential likely significant effects .</li> <li>■ Site will contribute to the Green Grid Network.</li> <li>■ Site/ policy will maintain protected habitats, species and valuable ecological networks.</li> <li>■ Site/ policy will achieve 10% BNG</li> <li>■ Site is located away from any national/ local designations (a mix of G with some A)</li> <li>■ HRA doesn't identify any potential likely significant effects.</li> <li>■ Site/ policy will result in the fragmentation of habitats and species and deterioration of designated sites.</li> <li>■ Site/ policy will result in a significant net loss of biodiversity (&gt;10%)</li> <li>■ Site is located within an NNR, SAC, SSSI and/ or SPA.</li> <li>■ Site is located within a SINC or LNR and no contribution is made to biodiversity net gain.</li> </ul>

<sup>27</sup> Transport for London, Healthy Streets for London, [online] available at: <https://content.tfl.gov.uk/healthy-streets-for-london.pdf>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<p>from the borough's natural capital?</p> <ul style="list-style-type: none"> <li>Prevent fragmentation of habitats and promote ecological networks?</li> <li>Result in developments which will improve biodiversity on site?</li> </ul>		<p>[Red]</p> <p>[Yellow]</p> <p>-</p>	<ul style="list-style-type: none"> <li>HRA identifies likely significant effects.</li> <li>Severe the Green Grid Network</li> <li>Site/ policy will result in the fragmentation of habitats and species and deterioration of designated sites.</li> <li>Site/ policy will result in a net loss of biodiversity (&lt;10%)</li> <li>Site is located within close proximity to NNR, SAC, SSSI and/ or SPA.</li> <li>Site is located within SINC or LNR but site will contribute to BNG.</li> <li>There may be some temporary short-term negative effects on biodiversity as a result of construction activities.</li> </ul>
Landscape and Townscape	IIA10: To protect and enhance the borough's townscapes and landscapes.	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> <li>Respect, maintain and strengthen local character and distinctiveness?</li> <li>Achieve high quality sustainable design for buildings, spaces and the public realm?</li> <li>Improve the quality and condition of the townscape and landscape?</li> <li>Improve the quality of parks and open spaces?</li> <li>Incorporate green and blue infrastructure into design?</li> </ul>	<ul style="list-style-type: none"> <li>Borough Designated Views</li> <li>London View Management Framework</li> <li>Tall Building Zone</li> <li>Strategically Important Skyline</li> <li>London Squares</li> <li>Local Open Space</li> <li>Metropolitan Open Land</li> <li>Green Grid Network</li> </ul>	<p>++</p>	<ul style="list-style-type: none"> <li>The site/ policy will respect, maintain, and strengthen local character and distinctiveness.</li> <li>The site/ policy will ensure high quality design which is sympathetic to the local townscape and landscape.</li> <li>The site will incorporate green and blue infrastructure as part of design.</li> <li>The site/ policy will increase, protect and enhance the public realm, parks and open spaces.</li> </ul>
				<p>+</p>	<ul style="list-style-type: none"> <li>The site/ policy will ensure high quality design which is sympathetic to the local townscape and landscape.</li> <li>The site will incorporate green and blue infrastructure as part of design.</li> </ul>
				<p>--</p>	<ul style="list-style-type: none"> <li>The site/ policy will result in unsympathetic design which will deteriorate the local landscape and townscape (including tall building zones, strategically important skyline and designated views).</li> <li>The site/ policy will result in tall buildings outside of the Tall Building Zone.</li> <li>The site/ policy will result in the loss of parks and open spaces and public realm, without any additional provision provided.</li> </ul>
				<p>-</p>	<ul style="list-style-type: none"> <li>There may be some temporary short-term negative effects on the local landscape and townscape as a result of construction activities.</li> <li>The site/ policy will result in the loss of parks and open spaces and public realm, but additional provision will be provided as part of design.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Historic Environment	IIA11: To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>Contribute to the better management of heritage assets and contribute to conserving heritage at risk?</li> <li>Improve the quality and condition of the historic environment?</li> <li>Respect, maintain and strengthen local character and distinctiveness?</li> </ul>	<ul style="list-style-type: none"> <li>Listed Buildings</li> <li>Registered Parks and Gardens</li> <li>Scheduled Monuments</li> <li>Heritage at risk</li> <li>Conservation areas</li> <li>Archaeological Priority Area</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site will result in enhancements to designated and non-designated heritage assets and/or their setting, fully taking into consideration the significance and value of the asset.</li> <li>Local character will be respected and enhanced.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site will result in enhancements to designated and non-designated heritage assets and/or their setting.</li> <li>Local character will be respected and maintained.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/ site would diminish the significance of designated heritage assets and/or their setting.</li> <li>There would be major damage to designated and non-designated heritage assets (including buried archaeological sites/remains).</li> <li>The site is located within a conservation area and makes no consideration to sympathetic design.</li> </ul>
				-	<ul style="list-style-type: none"> <li>The policy/ site will result in the loss of significance of undesignated heritage assets.</li> <li>The setting of heritage assets is likely to be short term and temporary.</li> </ul>
Water Environment	IIA12: To reduce the risk and vulnerability to flooding.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Reduce the risk of flooding?</li> <li>Result in urban creep?</li> <li>Increase surface runoff?</li> </ul>	<ul style="list-style-type: none"> <li>Flood Zone</li> <li>Flood Risk Area</li> <li>Critical drainage area</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site would result in a significant reduction to flood risk.</li> <li>Design incorporates SuDs, nature-based solutions and other flood alleviation measures.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site would indirectly result in an improvement to flood risk.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The site is located within a flood zone 3.</li> <li>Site is located within a critical drainage area.</li> <li>No measures have been put in place to mitigate and alleviate flood risk</li> <li>Site/ policy will encourage urban creep</li> </ul>
				-	<ul style="list-style-type: none"> <li>The site is located in a flood zone 2.</li> <li>Site is located within a critical drainage area</li> <li>Some measures have been put in place to mitigate flood risk.</li> </ul>
	IIA13: To maintain and enhance water quality.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Support the protection and enhancement of water bodies?</li> <li>Result in the reduction of water quality?</li> </ul>	<ul style="list-style-type: none"> <li>Statutory Main River</li> <li>Water Spaces</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site would make a significant improvement in surface water quality and/ or in groundwater quality.</li> <li>Water spaces will be improved and enhanced.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site would contribute to a minor or indirect improvement in surface water quality or in groundwater quality.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/ site would have a major effect on fluvial and groundwater quality and lead to long term or continuous effects on receptors (e.g., designated habitats, or recreational users) that cannot reasonably be mitigated.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
					<ul style="list-style-type: none"> <li>Site is located &lt;16m away from a water course</li> </ul>
				-	<ul style="list-style-type: none"> <li>The policy/ site would have a minor effect on fluvial and ground water quality and lead to short term or intermittent effects on receptors (e.g., protected species or recreational users).</li> <li>Site is located &lt;50m away from a water course.</li> <li>These effects are likely to be short term and are unlikely to be avoided but could be mitigated.</li> </ul>
Air Quality	IIA14: To protect and enhance air quality.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Support measures to reduce levels of air pollution?</li> <li>Help to improve air quality?</li> <li>Support measures for the reduction of congestion and traffic levels particularly in AQMAs and congestion hot-spots?</li> </ul>	<ul style="list-style-type: none"> <li>NO<sub>2</sub></li> <li>PM<sub>10</sub></li> <li>Motor Vehicle restricted area</li> <li>Air Quality Focus Areas</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site would result in a major enhancement of the air quality.</li> <li>The policy/ site would substantially reduce levels of traffic and congestion.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site would indirectly result in the enhancement of air quality.</li> <li>The policy/ site would indirectly reduce levels of traffic and congestion.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/ site would result in a major decrease in the air quality.</li> <li>The policy/ site would substantially increase levels of traffic and congestion.</li> </ul>
				-	<ul style="list-style-type: none"> <li>The policy/ site would indirectly result in a decrease of the air quality.</li> <li>The policy/ site would indirectly increase levels of traffic and congestion.</li> </ul>
Climate Change and Greenhouse Gases	IIA15: Ensure that Tower Hamlets is resilient to the effects of climate change.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Contribute further to the urban heat island effect?</li> <li>Ensure new development is designed to mitigate overheating risk?</li> <li>Increase the resilience of infrastructure and material assets to the impacts of climate change (including flood</li> </ul>	<ul style="list-style-type: none"> <li>Overall Climate Risk</li> <li>Overall Heat Risk</li> <li>Flood Zone</li> <li>Flood Risk Area</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/site would have a major positive effect on increasing the resilience/ decreasing the vulnerability to climate change effects.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/site would have a minor positive effect on increasing the resilience/ decreasing the vulnerability to climate change effects.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/site would have a major negative effect on resilience/ significantly decrease vulnerability to climate change effects.</li> <li>The site is located within a combination of the following: overall climate risk, overall heat risk, flood zone 3 and/or flood risk area.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		risk, extreme weather, heat and cold)?		-	<ul style="list-style-type: none"> <li>The policy/ site would not increase resilience/decrease vulnerability to climate change effects; however, the site isn't currently vulnerable to the effects of climate change.</li> </ul>
	IIA16: To reduce greenhouse gas emissions, support national and local decarbonisation initiatives and encourage energy efficiency.	Will the policy or proposal: <ul style="list-style-type: none"> <li>Support low carbon and energy efficient design?</li> <li>Contribute to reducing emissions as per the Paris Agreement?</li> <li>Support the borough's Net Zero ambitions by 2045?</li> <li>Increase renewable energy generation?</li> <li>Support low carbon, energy efficient design?</li> <li>Reduce levels of embodied carbon?</li> </ul>	<ul style="list-style-type: none"> <li>NO<sub>2</sub></li> <li>PM<sub>10</sub></li> <li>Motor Vehicle restricted area</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site will support opportunities for renewable energy production.</li> <li>The policy/ site will reduce GHG emissions and provide new infrastructure/assets that maximise the use of renewable energy sources.</li> <li>The option would provide opportunities for significant carbon sequestration</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site will support opportunities for renewable energy production.</li> <li>The policy/ site will reduce GHG emissions.</li> <li>The option would provide opportunities for carbon sequestration</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/ site results in a major increase in energy consumption with no renewable energy options.</li> <li>The construction/operation of the site would involve a significant amount of embodied carbon.</li> <li>The option would result in major or long-term increases in operational GHGs</li> </ul>
				-	<ul style="list-style-type: none"> <li>The policy/ site results in a minor increase in energy consumption with no renewable energy options.</li> <li>The policy/ site would result in a minor increase in GHGs emissions; however, this would be temporary.</li> </ul>
Material Assets (including Soil Resources)	IIA17: To reduce the amount of waste produced and minimise the amount sent to landfill	Will the policy or proposal: <ul style="list-style-type: none"> <li>Minimise the amount of waste?</li> <li>Support the waste hierarchy?</li> <li>Support the use of sustainable materials?</li> </ul>	<ul style="list-style-type: none"> <li>Waste management sites</li> <li>Safeguarded Wharves</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site will re-purpose existing infrastructure and re-use or recycle substantial quantities of waste materials.</li> </ul>
				+	<ul style="list-style-type: none"> <li>The policy/ site will re-use or recycle moderate quantities of waste materials.</li> </ul>
				--	<ul style="list-style-type: none"> <li>The policy/ site will require significant new infrastructure that cannot be provided through the re-use or recycling of waste materials.</li> </ul>
				-	<ul style="list-style-type: none"> <li>The policy/ site will require new infrastructure with only limited opportunities for the re-use or recycling of waste materials.</li> </ul>
		Will the policy or proposal:	<ul style="list-style-type: none"> <li>Brownfield Land</li> </ul>	++	<ul style="list-style-type: none"> <li>The policy/ site is located on a brownfield site and has no effect on soils or existing land use.</li> </ul>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
	IIA18: To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.	<ul style="list-style-type: none"> <li>Support the use of brownfield land?</li> <li>Seek to use sustainable construction methods and materials?</li> <li>Support the use of sustainable materials?</li> <li>Use locally sourced materials?</li> </ul>		<div style="background-color: green; color: white; text-align: center; padding: 5px;">+</div> <div style="background-color: yellow; color: black; text-align: center; padding: 5px;">--</div> <div style="background-color: red; color: white; text-align: center; padding: 5px;">-</div>	<ul style="list-style-type: none"> <li>Any new infrastructure will incorporate substantial sustainable design measures and materials.</li> <li>The policy/ site is predominantly located on a brownfield site and has no effect on soils or existing land use.</li> <li>Any new infrastructure will incorporate some sustainable design measures and materials.</li> <li>The policy/ site will result in a major loss in greenfield land or is in substantial conflict with existing land use.</li> <li>There are no opportunities for sustainable design or the use of sustainable materials</li> <li>The policy/ site will result in some loss in greenfield land or is in conflict with existing land use.</li> <li>There are limited opportunities for sustainable design or the use of sustainable materials.</li> </ul>

**Table B-3** sets out the criteria used for each of the indicators used for the RAG assessment.

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
IIA1: Population and Equalities	Population density (Ward)	Higher than the borough average (15,695p/h)	Higher than the London but lower than the borough average	Lower than the London average (5,598p/h)	
	IMD Overall deprivation (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	
	Primary Schools	>3.2km	<3.2km	<1km	Department for Education (DfE), Home to School Transport and Travel Guidance, 2014 <sup>28</sup>
	Secondary Schools	>4.8km	<4.8km	<1 km	DfE Home to School Transport and Travel Guidance, 2014
	Higher Education	>4.8km	<4.8km	<1 km	DfE Home to School Transport and Travel Guidance, 2014

<sup>28</sup> Department for Education (DfE), Travel to school for children of compulsory school age Statutory guidance for local authorities, 2014 [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1165730/Travel to school for children of compulsory school age.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165730/Travel_to_school_for_children_of_compulsory_school_age.pdf)

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
IIA2: Health and Wellbeing	IMD Health (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	Life Expectancy - Female (Ward)	Worse than the national average (<81.7)	Similar to the national average (81.7-84.1)	Higher than the national average (84.1-87.9)	Professional judgement
	Life Expectancy - Male (Ward)	Worse than the national average (<77.9)	Similar to the national average (77.91-80.2)	Higher than the national average (80.21-84.7)	Professional judgement
	Healthcare (GPs, dentists, pharmacies, hospitals)	>800m		<800m	Chartered Institution of Highways & Transportation (CIHT) - Planning for Walking, 2015 <sup>29</sup>
	Allotments		>800m	<800m	CIHT - Planning for Walking, 2015
	Children and family Centres	>800m		<800m	CIHT - Planning for Walking, 2015
	Community Centres	>800m		<800m	CIHT - Planning for Walking, 2015
	Leisure services	>800m		<800m	CIHT - Planning for Walking, 2015
	Social services	>800m		<800m	CIHT - Planning for Walking, 2015
	Parks and open spaces	>800m		<800m	CIHT - Planning for Walking, 2015
	Sports facilities	>800m		<800m	CIHT - Planning for Walking, 2015
	Areas deficient in nature	Within		Outside	Professional Judgement
IIA3/4: Economy and Employment	IMD Employment (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	IMD Income (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	Central Activities Zone		Outside	Within/intersect	Professional judgement
	Tower Hamlets Activity Areas		Outside	Within/intersect	Professional judgement
	Local Industrial Location	>800m		<800m	CIHT - Planning for Walking, 2015
	Strategic Industrial locations	>800m		<800m	CIHT - Planning for Walking, 2015
	Employment sites	>800m		<800m	CIHT - Planning for Walking, 2015
	Local Employment Location	>800m		<800m	CIHT - Planning for Walking, 2015

<sup>29</sup> Chartered Institution of Highways & Transportation, Planning For Walking, 2015 [online] available at: [https://www.ciht.org.uk/media/4465/planning\\_for\\_walking\\_-\\_long\\_-\\_april\\_2015.pdf](https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf)

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	Primary Shopping Areas	>800m		<800m	CIHT - Planning for Walking, 2015
	Neighbourhood Parade	>800m		<800m	CIHT - Planning for Walking, 2015
	Primary Shopping Areas	>800m		<800m	CIHT - Planning for Walking, 2015
	Town Centres (major, district and neighbourhood)	>800m		<800m	CIHT - Planning for Walking, 2015
IIA5: Housing	IMD Barriers to housing (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	House Prices (wards)	Exceeds London Average	Exceeds national average but below London Average	In line with England Average	Professional judgement
IIA6: Crime and Safety	IMD Crime (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional Judgement
	Crime Rate (Ward)	Worse than the borough average (>127.5 per 1,000)	Higher than the London but lower than the Borough average	Lower than the London average (<95 per 1,000)	Professional Judgement
IIA7/8: Transport and Accessibility	PTAL	0, 1a, 1b,	2, 3, 4	5, 6a, 6b	TfL - Assessing transport connectivity in London
	Bus Stops	>400m	200-400m	<200m	CIHT - Planning for Walking, 2015
	Train Station	>800m		<800m	CIHT - Planning for Walking, 2015
	Tube Station	>800m		<800m	CIHT - Planning for Walking, 2015
	National Cycle Network	Site is not connected to national cycle network		Site is connected to national cycle network	Professional judgement
	London Cycle Network	Site is not connected to London Cycle network		Site is connected to London Cycle network	Professional judgement
	Cycle Hire Station	>400m	200-400m	<200m	Professional judgement
	Cycle Superhighway	Site is not connected to cycle superhighway		Site is connected to cycle superhighway	Professional judgement
IIA9: Biodiversity and Natural Capital	EV Charge Point		>200m	<200m	Professional judgement
	Local Nature Reserve	<0.01 km	< 0.8km	>0.8km	Professional judgement
	National Nature Reserve	<0.01 km	< 0.8km	>0.8km	Professional judgement
	Priority Habitat Inventory	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SiNC	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SAC	<0.01 km	< 0.8km	>0.8km	Professional judgement

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	SSSI	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SPA	<0.01 km	< 0.8km	>0.8km	Professional judgement
IIA10: Landscape and Townscape	Borough Designated Views	Within/adjacent		Outside	Professional judgement
	London View Management Framework	Within/adjacent		Outside	Professional judgement
	Tall Building Zone	Within Zone		Outside	Professional judgement
	Strategically Important Skyline	Within/adjacent		Outside	Professional judgement
	London Squares	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	Professional judgement
	Local Open Space	Within/adjacent		Outside	Professional judgement
	Metropolitan Open Land	Within/adjacent		Outside	Professional judgement
	Green Grid	Within/adjacent		Outside	Professional judgement
IIA11: Historic Environment	Listed Buildings	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	Historic England (HE) 'The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3' <sup>30</sup>
	Registered Parks and Gardens	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Scheduled Monuments	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Heritage at risk	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Conservation areas	Within/adjacent		Outside	HE Advice Note 3
	Archaeological Priority Area	Within/adjacent		Outside	HE Advice Note 3
IIA12: Flood Risk	Flood Zone	Flood Zone 3	Flood Zone 2	Flood Zone 1	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3 <sup>31</sup>

<sup>30</sup> Historic England, 'The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3 [online] available at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

<sup>31</sup> Defra, Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3, 2017 [online] available at: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3>

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	Flood Risk Area		Yes	No	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
IIA13: Water Quality	Statutory Main River	<16m	<50m	>50m	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
	Water Spaces	<16m	<50m	>50m	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
	Critical drainage area		>15% of the site is within CDA	<15% of the site is within a CDA	Professional judgement
IIA14: Air Quality/ IIA16: Greenhouse Gases	NO <sub>2</sub>	>43µ/m <sup>3</sup>	>28-43µ/m <sup>3</sup>	<16 - 28µ/m <sup>3</sup>	Professional judgement
	PM <sub>10</sub>	>43µ/m <sup>3</sup>	>28-43µ/m <sup>3</sup>	<16 - 28µ/m <sup>3</sup>	Professional judgement
	Motor Vehicle restricted area		Outside	Within/intersect	Professional judgement
	Air Quality Focus Areas	Within		Outside	Professional judgement
IIA15: Climate Resilience	Overall Climate Risk	High	Medium & Medium-High	Low & Low-Medium	Greater London Authority's (GLA) Climate Risk Mapping Methodology <sup>32</sup>
	Overall Heat Risk	High	Medium	Low	GLA Climate Risk Mapping Methodology
IIA17: Waste	Waste management sites	Within/adjacent		Outside	Professional judgement
	Safeguarded Wharves	Within/adjacent		Outside	Professional judgement
IIA18: Efficient use of resources	Brownfield land	No	Part	Yes	Professional judgement

<sup>32</sup> Greater London Authority, Climate Risk Mapping, 2022 [online] available at: [https://data.london.gov.uk/dataset/climate-risk-mapping?\\_gl=1%2a1bed0y2%2a\\_ga%2aMTQ1MjkzNzM5LjE2OTA5ODA3NDI.%2a\\_ga\\_PY4SWZN1RJ%2aMTY5NDAXNzUxOC4xMC4wLjE2OTQwMTc1MTguNjAuMC4w](https://data.london.gov.uk/dataset/climate-risk-mapping?_gl=1%2a1bed0y2%2a_ga%2aMTQ1MjkzNzM5LjE2OTA5ODA3NDI.%2a_ga_PY4SWZN1RJ%2aMTY5NDAXNzUxOC4xMC4wLjE2OTQwMTc1MTguNjAuMC4w)

# Appendix C

## Consultation Comments

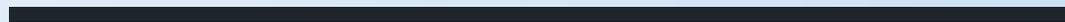




Table C-1 below sets out the consultation comments received from the Statutory consultees on the IIA Scoping Report. The table sets out how and where these comments have been addressed. No specific comment on the IIA were received from the Regulation 18 consultation.

**Table C-1 –Consultation Comments**

<b>ID</b>	<b>Consultee</b>	<b>Comment</b>	<b>Response</b>
1	Natural England	Natural England have no comments to make on this consultation.	Noted – no response required
2	Historic England	In terms of the historic environment, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the Local Plan, that it has established an appropriate Baseline against which to assess the Plan’s proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which this plan might have upon the historic environment.	Noted – no response required
3	Historic England	<p>Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout the preparation of the SA of this Plan.</p> <p>They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse</p>	The team will continue to engage and consult with Historic England throughout the IIA/ Local Plan process.

ID	Consultee	Comment	Response
		<p>impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment.</p>	
4	Historic England	<p>Table 4-1 Key Messages - Policy D9 of the London Plan 2021 is clear that in assessing and identifying appropriate locations for tall buildings, local plans should ensure that they avoid adverse impacts on the historic environment.</p>	<p>Table 4-1 in the IIA Report has been amended to the following “Ensure tall buildings are designed acceptably and situated in appropriate areas that avoid adverse impacts on heritage assets; ...’</p>
5	Historic England	<p>Table 4-1 Key Messages - A number of policies in the London Plan 2021 (notably D3 Optimising Site Capacity through the design-led approach and HC1 Heritage conservation and growth) also indicate that an understanding of heritage significance should be used to help inform and shape the design of new development to respond to context.</p>	<p>Table 4-1 in the Interim IIA Report has been amended to the following</p> <p>Addition of an extra bullet point which states</p> <p>‘Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to its context’</p> <p>Added at end of final existing bullet point</p> <p>‘ .. and positive place-shaping, including through using heritage assets as visitor attractions and the provision of visitor infrastructure.’</p>

ID	Consultee	Comment	Response
6	Historic England	Table 5-11 Issues and opportunities for the historic environment - See comments above in relation to London Plan policies D3 and HC1	Table D-11 and Table 4-1 in the IIA Interim report have been updated to include the following additional bullet - The NLP should ensure that the local historic environment (including the archaeological resource) informs design proposals, public realm and landscaping schemes to help ensure that heritage assets and their settings are enhanced.
7	Historic England	Table 6-1 IIA Appraisal Framework - Climate change is acknowledged as a risk for the historic environment earlier in the document. It should be made explicit here that well-intentioned but inappropriate interventions on historic buildings should be avoided.	Table D-11 and Table 4-1 in the IIA Interim report have been updated to include the following additional bullet - Climate change is acknowledged as a risk for the historic environment earlier in the document. It should be made explicit here that well-intentioned but inappropriate interventions on historic buildings should be avoided.
8	Historic England	Table A9 – Add Historic England Advice Note 4 (March 2022) Tall Buildings and London Borough of Tower Hamlets conservation area appraisals	Both documents have been added to Table E9 in the Interim IIA Report
9	Environment Agency	Table 4-1 Key Messages – Biodiversity and Natural Capital – Support inclusion of the important role of habitat connectivity. Suggest including wording in relation to Biodiversity Net Gain (BNG) to explain how	Table 4-1 in the IIA Interim Report has been updated to include the following Added within the first existing bullet point

ID	Consultee	Comment	Response
		developments must ensure appropriate habitat is created.	<p>‘...along with the important role habitat connectivity plays in building strong green and blue networks that protect and enhance biodiversity and natural capital...’</p> <p>Added at the end of the final existing bullet point</p> <p>‘...Developments must ensure appropriate habitat is created that will be of importance to habitat connectivity, provide ecologically enhanced green and blue spaces, and incorporate long-term management plans.’</p>
10	Environment Agency	Table 4-1 Key Messages – Material Assets – Note that whilst protecting groundwater quality has been considered, the need to protect groundwater quantity should also be addressed.	<p>Table 4-1 in the IIA Interim Report has been updated to include the following</p> <p>Addition of an extra bullet point (note: within Water Environment not Material Assets) which states</p> <p>‘Protect and enhance groundwater quantity and ensure that development does not place a burden on groundwater flow or quantity’.</p>
11	Environment Agency	5 Baseline – Transport and Accessibility – Recommend consideration is given to site selection for new infrastructure; to be located away from areas of high flood risk and where road drainage may impact on water, and to account for future climate change. Opportunity to advocate maximising opportunities to integrate	<p>Table 5-7 in the IIA Interim Report has been updated to include the following</p> <p>‘Site selection should account for future climate change, and consider locating transport infrastructure away from areas of</p>



ID	Consultee	Comment	Response
		connected blue and green infrastructure (BGI) along transport corridors.	<p>high flood risk, or where road drainage may impact on water quality issues</p> <p>The NLP should maximise opportunities to integrate connected blue and green infrastructure along transport corridors'</p>
12	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Biodiversity Net Gain (BNG) – Worth mentioning the frameworks that underpin BNG, particularly in relation to watercourses.	<p>Table 5-8 in the IIA Interim Report and Table 4-1 in the IIA Interim report have been updated to include the following</p> <p>'...including consideration of watercourses from the start of the design process in order to maintain the increase in biodiversity over the statutory 30 year period. Developments that seek to create habitat to support species identified as declining should be prioritised.'</p>
13	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Tree Planting – Note that trees planted under council initiatives must be diverse and native species.	<p>Section 8 of Appendix D of the IIA Interim Report has been updated to include the following</p> <p>Addition of an extra sentence which states 'Trees that are planted must be diverse and native species.'</p>
14	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Issues and Opportunities – Recommend stronger, more detailed wording. Refer to the expectation of development	Table D-8 and Table 4-1 in the IIA Interim Report have been updated to include the following



ID	Consultee	Comment	Response
		adjacent to watercourses to contribute to achieving Water Framework Directive (WFD) objectives.	Addition of an extra bullet point which states 'Development adjacent to watercourses are expected to contribute to achieving Water Framework Directive objectives relating to ecological status; this includes connectivity for fish and removal of invasive species'
15	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Implications for the NLP – Support the inclusion of wording to reduce the use of hard engineering for future development.	Table D-8 in the IIA Interim Report has been amended to include the following  'The NLP will need to encourage development opportunities to remove in-channel structures when present within the watercourse, the use of hard engineering should require strong justification'
16	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Key Risks/Opportunities – Recommend actions in relation to the Water Framework Directive (WFD) are considered. Suggest a map of the watercourses and associated WFD status would be useful. Also recommend consideration is made regarding invasive non-native species and their management.	WFD has been considered within the 'Water Environment' section of the baseline (Appendix D). This include the ecological status of water bodies. A map of waterbodies hasn't been included but will be used as part of the site assessments.
17	Environment Agency	5 Baseline – Water Environment – Recommend it is made clear that the WFD also includes groundwater water bodies. Refer to Greenwich Tertiaries and Chalk and its classification.	Appendix D of the IIA Interim Report have been updated to include the following  'The WFD also includes groundwater water bodies, with the objective of achieving 'good'

ID	Consultee	Comment	Response
			<p>quantitative and chemical status. The borough contains one such groundwater body, Greenwich Tertiaries and Chalk, which currently has 'poor' chemical and quantitative classification.'</p>
18	Environment Agency	<p>5 Baseline – Water Environment – Issues and Opportunities – Water quality and flood risk should have their own separate subsections. Details are given on the recommended content for each theme.</p>	<p>Table D-13 in the IIA Report and Table 4-1 in the IIA Interim Report have been amended to include the following</p> <p>'...in addition to existing residual flood risk in the event of a breach or failure of the flood defences.'</p> <p>Table D-13 in the IIA Report has been updated to include the following</p> <p>Addition of extra bullet points that state</p> <p>'The NLP should promote that development in close proximity to a watercourse should include the addition of naturalised features to buffer zones to connect the river to the riparian zone, create natural flood management (NFM) schemes, and promote biodiversity.'</p> <p>'The NLP should seek to protect groundwater quality as a water resource. '</p> <p>'The NLP should ensure that development in close proximity to a watercourse should</p>

ID	Consultee	Comment	Response
			<p>include provision of natural, undeveloped buffer zones. These can help contribute to natural flood management (NFM) whilst also allowing access for maintenance and emergency works.'</p> <p>'The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.'</p>
19	Environment Agency	5 Baseline – Air Quality – Recommend the borough commits to and considers how to deliver an air quality neutral and air quality positive approach. Encourage consideration is also given to how an air quality approach can be linked to other policies.	For consideration by LBTH
20	Environment Agency	5 Baseline – Climate Change and Greenhouse Gases – Issues and Opportunities – Expand the point regarding flooding under the need to implement and facilitate climate change adaptation. Opportunity to discuss the implementation of Nature-based solutions (NbS) to build resilience to climate impacts. Consider habitat connectivity and ensuring wild refuge areas are maintained as fundamentals of creating resilient functioning ecosystems. Recommend creation of new re-naturalised areas. Advise setting a target for the percentage of wild cover within green spaces.	<p>Table D-16 has been updated to include the following:</p> <p>'The NLP should promote the implementation of Nature-based solutions (NbS) to build resilience to facilitate climate change adaptation, whilst providing a feasible method to sequester and store carbon in line with net zero ambitions.'</p> <p>Table D-12 has been updated to include the following</p>

ID	Consultee	Comment	Response
			‘The NLP should set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.’
21	Environment Agency	5 Baseline – Material Assets – Geology and soil – Discussion of geology should be expanded to include discussion of the protection of superficial deposits.	Appendix D of the IIA Interim Report have been updated to include the following Addition of an extra sentence which states ‘The Taplow and Kempton Park Gravels in the borough are classified as Secondary A aquifers and are therefore protected superficial deposits.’
22	Environment Agency	5 Baseline – Material Assets – Contaminated Land – Clarify that remediation should seek to protect and improve both groundwater and land quality.	Appendix D of the IIA Interim Report have been updated to include the following Added at end of existing sentence which states ‘...and remediation should seek to protect and improve both groundwater and land quality.’
23	Environment Agency	5 Baseline – Material Assets – Issues and Opportunities – Consider NPPF paragraphs 174 and 183 and promote relevant guidance from the Environment Agency with respect to groundwater and land quality issues. The requirements expected of developers under policies is also noted.	These paragraphs have been considered within the review of plans, policies and programmes. Groundwater issues have been considered within the ‘Water Environment’ topic in Appendix D.



ID	Consultee	Comment	Response
24	Environment Agency	6 IIA Appraisal Framework – Biodiversity and Natural Capital – Note two points to be added to the ‘Key Sustainability Issues and Opportunities’.	<p>The IIA Appraisal Framework has been updated to include the following</p> <p>Addition of two extra bullet points which state</p> <p>‘Developments which encroach on the 10m buffer zone next to a watercourse will fragment habitat connectivity and reduce the ability for biodiversity to thrive.</p> <p>In-channel structures such as weirs and culverts inhibit fish passage and alter the natural state of the river corridor.’</p>
25	Environment Agency	6 IIA Appraisal Framework – Biodiversity and Natural Capital – Note one point to be added to the ‘IIA Supporting Appraisal Questions’ relating to watercourses and river corridors.	<p>The IIA Appraisal Framework has been updated have been updated to include the following</p> <p>‘Re-naturalise the river corridor and promote geomorphological processes which enhance and protect biodiversity?’</p>
26	Environment Agency	6 IIA Appraisal Framework – Water Environment – Sequential approach to decisions on policies and proposals in supporting appraisal questions should be suggested. Similarly to ID17, it is recommended that the issues and opportunities surrounding groundwater are considered. Specific reference to groundwater quality is also recommended.	<p>The IIA Appraisal Framework has been updated to include effects on groundwater.</p>

ID	Consultee	Comment	Response
27	Environment Agency	6 IIA Appraisal Framework – Water Environment – Note one point to be added to the ‘Key Sustainability Issues and Opportunities’ relating to the riparian buffer zone.	The IIA Appraisal Framework has been updated to include the following  ‘Increased development which encroaches on a natural riparian buffer zone next to a watercourse, or one which is within a 10m distance from the watercourse, will have a negative effect on water quality and can increase flood risk.’
28	Environment Agency	6 IIA Appraisal Framework – Water Environment – Note one point to be added to the ‘IIA Supporting Appraisal Questions’ relating to natural forms of flood management.	The IIA Appraisal Framework has been updated been updated to include the following  ‘Support a natural form of flood management which also promotes biodiversity of the watercourse?’
29	Environment Agency	6 IIA Appraisal Framework – Material Assets – Expand the supporting appraisal questions to consider groundwater and land quality.	The IIA Appraisal Framework has been updated been updated to include the following  ‘Protect and enhance groundwater and land quality?’
30	Environment Agency	Appendix A – Table A-7 – Biodiversity and Natural Capital – Recommendation for additional specific information about the Water Framework Directive (WFD).	The WFD has been added to Table E-7 of the IIA Interim Report.



ID	Consultee	Comment	Response
31	Environment Agency	Appendix A – Table A-10 – Water Environment – The Metropolitan Flood Act 1879 should be included.	As this has been superseded this has not been included within Appendix E.
32	Environment Agency	Appendix A – Table A-13 – Material Assets – NPPF paragraph 183 should be included. Note that the Environment Agency will apply the position statements outlined in their Approach to Groundwater Protection.	<p>Table E-13 in the IIA Interim Report have been updated to include the following</p> <p>Paragraph 183 states: “<i>Planning policies and decisions should ensure that:</i></p> <ul style="list-style-type: none"><li>(a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)</li><li>(b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</li><li>(c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.</li></ul>

# Appendix D

**Baseline**



# Introduction

This appendix sets out the baseline information and issues and opportunities. Both the baseline and issues and opportunities have been updated following consultation of the Scoping Report in July 2023.

## Population and Equalities

### Summary of Current Baseline

The borough has a total population of approximately 310,300 people<sup>33</sup>. Out of the boroughs within London, LBTH has the highest population density of 15,695 people per square kilometre. This is significantly higher than the regional and national population density averages of 5,598 people per square kilometre, and 434 people per square kilometre, respectively.

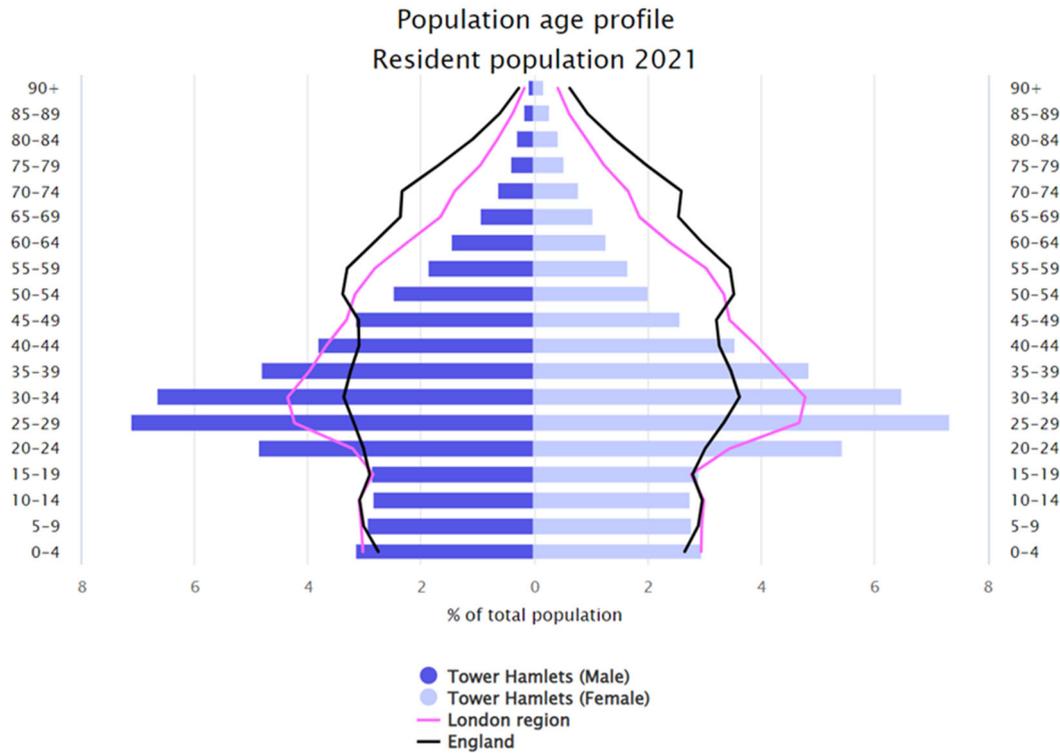
The highest proportion of people in the borough are aged between 25-29 years, who make up 14.3% of the total population, as conceptualised in **Figure D-1** overleaf. The percentage of those aged 65 years and over (5.6%) is lower than the London average of 11.9% and the national average of 18.4%.

Within LBTH, approximately 49.8% of the population are females and 50.8% are males. This is comparable to both the London average (51.5% females, 48.5% males) and the national average (51.0% females, 49% males).

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<sup>33</sup> Office for National Statistics Population and household estimates, England and Wales: Census 2021. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

**Figure D-1 - Age Distribution Pyramid<sup>34</sup>**



According to the 2021 Census data<sup>35</sup>, 51.7% of the population of LBTH are black, Asian and minority ethnic (BAME), 38.7% are White, 4.96% are ‘Mixed/Multiple’ ethnic group, 3.89% are ‘Other’ ethnic group, and 0.75% are Gypsy, Irish Traveller or Roma. Both the BAME and White ethnic group saw a decrease in population since the 2011 Census<sup>36</sup>. Conversely, the ‘Other’ ethnic group increased between the Census’. The ‘Mixed/Multiple’ ethnic group and Gypsy, Irish Traveller or Roma comprised similar proportions of the borough population across this period.

Net internal migration accounts for approximately three quarters of the borough’s population growth, with LBTH having the second highest number of short-term migrants in London<sup>37</sup>. More than four in ten residents (43%) were born outside of the UK, with residents born in

<sup>34</sup> Office for Health Improvement & Disparities, Local Authority Health Profiles. Available at:

<https://fingertips.phe.org.uk/profile/health-profiles/data#page/12/gid/1938132696/pat/6/ati/402/are/E09000030/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1>

<sup>35</sup> Office for National Statistics. Ethnic group, England and Wales: Census 2021. Available online at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/bulletins/ethnicgroupenglandandwales/census2021>

<sup>36</sup> Tower Hamlets Council (2013) Ethnicity in Tower Hamlets: Analysis of 2011 Census data. Available at: [RB-Census2011-Ethnicity-2013-01.pdf \(towerhamlets.gov.uk\)](#)

<sup>37</sup> Tower Hamlets Council (2017) A Profile of the Migrant Population in Tower Hamlets. Available at: [A Profile of the Migrant Population in Tower Hamlets.pdf \(towerhamlets.gov.uk\)](#)

Bangladesh making up the biggest migrant group<sup>38</sup>. LBTH has a highly mobile population, with 23.5% moving to, from and within the borough each year<sup>39</sup>.

The majority of residents in LBTH are Muslim (39.9%), followed by 'no religion' (26.6%), Christian (22.3%), Hindu (2%), Buddhist (0.95%), other religion (0.53%), Jewish (0.43%), and Sikh (0.31%)<sup>40</sup>. However, 6.9% of people did not answer the 2021 Census question about religious belief. Since the 2011 Census, the proportion of Christian residents has fallen by -7.7% (from 30%), and people with 'no religion' has risen by +5.6% (from 21%)<sup>41</sup>. The other faith groups have remained largely unchanged between Census'.

Looking at the Indices of Multiple Deprivation in 2019 (IMD2019), LBTH has become considerably less deprived since IMD2015, ranking 175 in IMD2019 compared to 24 in IMD2015 out of 317 Local Authorities, indicating that the neighbourhoods within the authority have become less deprived relative to other neighbourhoods in England<sup>42</sup>.

Both the wards of St Peter's and Stepney Green have Lower Super Output Areas (LSOAs)<sup>43</sup> located within the top 10% of most deprived neighbourhood nationally, whilst there are 13 LSOAs located within the top 20% of most deprived neighbourhoods nationally. Island Gardens is the only ward which has a LSOA located within the top 10% of least deprived neighbourhoods nationally.

The borough has the highest income deprivation affecting older people in England, with 43.9% living in deprived households. The proportion of older persons living in income deprived families is also significantly higher than national averages<sup>44</sup>. Older people in the borough are also much more sensitive to fuel poverty, in line with 1 in 10 older households in the UK are in fuel poverty<sup>45</sup>, with this demographic much more likely to be vulnerable to the issue.

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<sup>38</sup> Tower Hamlets Council (2020) Borough Profile 2020: Chapter 4: Poverty. Available at: [BoroughProfilePoverty.pptx \(live.com\)](#)

<sup>39</sup> Wood Group UK Limited (2021) London Borough of Tower Hamlets: Tall Buildings Supplementary Planning Document. Integrated Impact Assessment. Appendix

<sup>40</sup> Office for National Statistics, Religion, England and Wales: Census 2021. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/bulletins/religionenglandandwales/census2021>

<sup>41</sup> Tower Hamlets Council (2015) Religion in Tower Hamlets: 2011 Census Update. Available at: [2015-04-21-Faith-key-facts-Revised-data.pdf \(towerhamlets.gov.uk\)](#)

<sup>42</sup> Ministry of Housing, Communities and Local Government, Indices of Multiple Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>43</sup>

<sup>44</sup> Wood Group UK Limited (2021) London Borough of Tower Hamlets: Tall Buildings Supplementary Planning Document. Integrated Impact Assessment – Main Report

<sup>45</sup> Age UK (2021) The Cost of Cold. Available at: [age-uk-the-cost-of-cold-nmp \(ageuk.org.uk\)](#)

Child poverty within the borough is also significant problem. LBTH has high rates of children living within both relative and absolute low income families<sup>46</sup>, with 27.3% of children in relative low income families and 21.4% within absolute low income families<sup>39</sup>. The borough has the highest rate of child poverty in the UK, with 31% of children living below the national poverty line<sup>47</sup>.

### **Future Trends and evolution of the baseline without the NLP**

The population of LBTH has grown by 22.1% since 2011<sup>48</sup>, the largest percentage growth in population in England, and is predicted to see a population increase of 8.4% by mid-2028<sup>49</sup>. The population isn't just growing it is also becoming younger and more diverse, with the current largest age demographic 25-29 years projected to increase by 11.3%, and almost half of the population by mid-2028 in the 20-39 years bracket. This equates to an increased working age population and a more economically active borough, likely stimulating a higher demand for career opportunities.

By 2033 it is expected that more people will be living on their own, constituting 41% of all households nationally<sup>50</sup>. With this statistic in mind, LBTH, along with the rest of the country, is facing a housing crisis. The demand for specific housing which meets need will continue to rise over the coming years.

By 2031, ethnic minority populations are predicted to rise to 37% of the total population of London<sup>51</sup>. LBTH is already a diverse and culturally rich borough, and with this proportion expected to increase, the demand for the provision of cultural spaces and facilities will be prevalent.

The NLP will allow for better management of the types of housing being built in the borough to ensure there is suitable housing to meet the needs of residents both now and in future, reflecting the changing demographic. It would also allow for LBTH to better target community services and facilities to the areas where growth is most likely to occur and/or aid in better dispersing the projected growth in population across more of the borough. This

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<sup>46</sup> Relative low income: This refers to people living in households with income below 60% of the median in that year. Absolute low income: This refers to people living in households with income below 60% of median income in a base year, usually 2010/11. This measurement is adjusted for inflation.

<sup>47</sup> Tower Hamlets Council (2015) Child poverty in Tower Hamlets – research briefing. Available at: [2015\\_Child\\_Poverty\\_Briefing.pdf \(towerhamlets.gov.uk\)](#)

<sup>48</sup> Office for National Statistics (2022) How the population changed in Tower Hamlets: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000030/>

<sup>49</sup> Office for National Statistics, Subnational population projections for England: 2018-based. Available at: <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2018based>

<sup>50</sup> The Kings Fund. 2012. Demography: Future Trends. Available at: <https://www.kingsfund.org.uk/projects/time-think-differently/trends-demography>

<sup>51</sup> Wohland, P. et al. (2010). Research paper. 'Ethnic population projections for the UK and local areas, 2001-2015'. University of Leeds.

will also help to support community cohesion which will likely become more pertinent as the population becomes more ethnically diverse.

### Issues and Opportunities

Issues and opportunities for population and equalities and the implications for the Local Plan have been identified in **Table D-1**.

**Table D-1 – Issues and Opportunities for Population and Equalities**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income;</li> <li>■ There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities;</li> <li>■ The population of the borough is expected to increase both in number and diversity, and decrease in age profile; and</li> <li>■ Changing work habits such as remote, internet-based jobs are likely to reduce current demands but may also increase social isolation and reliance on alternative social interaction.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP will need to address any necessary housing and service development to ensure provisions to young adults and socially excluded population groups;</li> <li>■ Development will need to support future demographic change, tackle overcrowding and increase affordable housing stock; and</li> <li>■ The NLP will need to ensure there are adequate provisions of services and facilities within the borough, particularly for young adults, socially excluded groups and people with disabilities.</li> </ul>

## Human Health

### Summary of Current Baseline

The average life expectancy at birth in LBTH is similar but slightly higher than the national average at 79.9 years for male and 83.3 years for females<sup>52</sup>. This is slightly lower than the average for the London region at 80.3 years and 84.3 years respectively. Health inequalities are prevalent, with life expectancy lower in the most deprived areas than the least deprived areas for both men and women, at 11.4 years and 4.8 years respectively. This indicates human health disparity between gender and socio-economic groups.

In LBTH, 67.2% of adults (aged 19+) are physically active<sup>53</sup>. This is higher than both the regional and national averages at 66.4% and 66.3% respectively. The proportion of adults (aged 18+) classified as overweight or obese in LBTH is 49.1% and is significantly better than the national average. This is lower than the regional average of 55.9% and significantly lower than the national average of 62%. In year six children (aged 10-11 years) the prevalence of obesity (including severe obesity) is 25.3%, significantly worse than the national average of 20.2%. The percentage of children in low-income families is also significantly worse than the England average, at 30.3%. The regional and national averages are 18.8% and 17.0% respectively.

The IMD2019 health domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. LBTH is ranked 95th out of 317 local authorities<sup>21</sup>. Of the 144 Lower Super Output Areas (LSOAs) in the borough, one is located within the top 10% of most deprived neighbourhoods nationally in terms of health deprivation, whilst 25 are located in the top 20%<sup>21</sup>.

Poor air quality is a significant public health issue<sup>54</sup> and there is clear evidence that particulate matter has a significant contributory role in mortality. Each year in the UK between 28,000 and 36,000 deaths a year are attributed to long-term exposure to poor air quality<sup>55</sup>. Air pollution can also be linked to cardiovascular disease, diabetes, and dementia. Sufferers of chronic respiratory diseases such as Chronic Obstructive Pulmonary Disease (COPD) and asthma are especially vulnerable to the effects of air pollutants. Air

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<sup>52</sup> Tower Hamlets Local Authority Health Profile 2020. [online] Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/102/are/E09000030>

<sup>53</sup> Office for Health Improvement and Disparities. Local Authority Health Profiles (2019). Available online at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/13/gid/1938133216/pat/6/par/E12000007/ati/102/are/E09000030/yr/3/cid/4/tbm/1>

<sup>54</sup> Department for Environment Food and Rural Affairs, Air Quality: Public Health Impacts and Local Actions. Available online at: [https://aqm.defra.gov.uk/documents/air\\_quality\\_note\\_v7a-\(3\).pdf](https://aqm.defra.gov.uk/documents/air_quality_note_v7a-(3).pdf)

<sup>55</sup> Gov.uk, Public Health England publishes air pollution evidence review, 2019 [online] available at: <https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review>

pollution has also been shown to have an increased health impact on those in lower socio-economic groups.

The entirety of LBTH is situated within an Air Quality Management Area (AQMA) declared in 2000 for Particulate Matter (PM10) and Nitrogen dioxide (NO<sub>2</sub>)<sup>56</sup>. The AQMA identifies areas of higher air pollution that may affect health, from transport and industrial sources.

The borough has a higher rate of emergency hospital admissions for COPD when compared to the national average, with the majority of wards above the national average. LBTH as a borough admits 166.0 people per 100,000 people for COPD, higher compared to the national average (100.0 people per 100,000 people)<sup>57</sup>. St Peter's area has the highest admission rate of any ward within the borough, at 311.3 people per 100,000 people. Conversely, St Katherine's and Wapping performs better than the national average with 43.3 people per 100,000 people admitted.

The mortality rate (under 75 years) from all causes in LBTH is 361.1 people per 100,000 people<sup>52</sup>. This is significantly higher than the regional average of 303.3 people per 100,000 people and the national average of 330.5 people per 100,000 people.

The prevalence of smoking in LBTH among adults (aged 18+) is 20.3%<sup>52</sup>. This is higher than the regional average (13.9%) and the national average (14.4%).

Social isolation can lead to loneliness which has the potential to undermine well-being thereby impacting negatively on people's quality of life. Loneliness can have a huge impact on the wellbeing of many people particularly older people, those with disabilities and new and expectant mothers. It can often result in unhappiness, lowering of self-confidence and ability to reach out for help.

According to Age UK, the majority of the people aged 65 and over in the south of LBTH are within very low and low risk areas for loneliness with areas in the UK ranked from 1 high risk to 32,844 very low risk<sup>58</sup>. However, the centre and north of LBTH are within medium, high risk, and very high risk of loneliness. The heat map in **Figure D-2** overleaf visualises this trend.

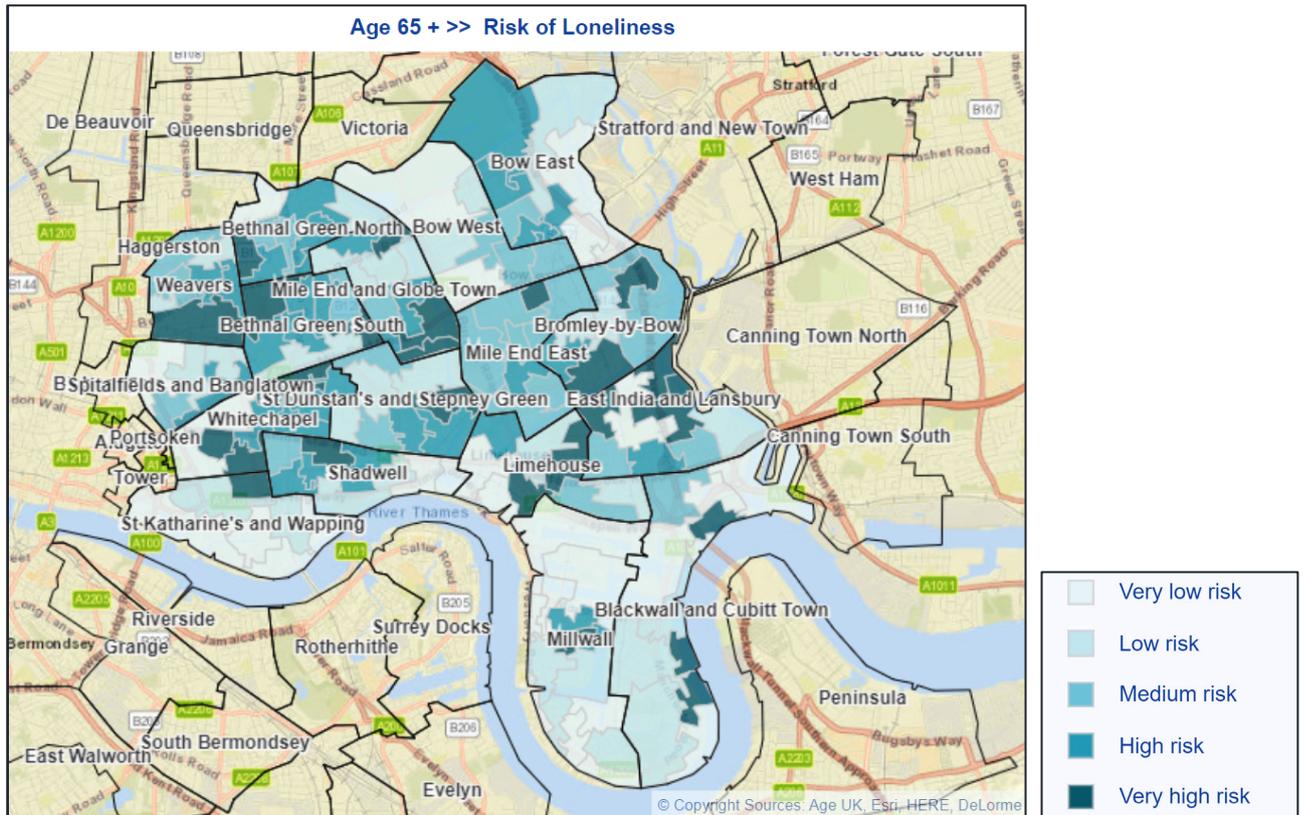
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<sup>56</sup> Department for Environment Food and Rural Affairs, UK AIR, Tower Hamlets AQMA. Available online at: [https://uk-air.defra.gov.uk/aqma/details?aqma\\_ref=141#132](https://uk-air.defra.gov.uk/aqma/details?aqma_ref=141#132)

<sup>57</sup> Public Health England, 2021. Local Health [online] Available at: [https://www.localhealth.org.uk/#bbox=377927,397127,28450,17731&c=indicator&i=t3.em\\_adm\\_copd&selcodgeo=E08000007&view=map10](https://www.localhealth.org.uk/#bbox=377927,397127,28450,17731&c=indicator&i=t3.em_adm_copd&selcodgeo=E08000007&view=map10)

<sup>58</sup> Age UK (2016). Risk of Loneliness. Available online at: <https://www.ageuk.org.uk/our-impact/policy-research/loneliness-research-and-resources/loneliness-maps/>

Figure D-2 – Heat Map of Relative Risk of Loneliness<sup>58</sup>



The spread of COVID-19 in the UK has resulted in significant pressure upon NHS resources, particularly hospitals, and has resulted in additional wait times for routine healthcare appointments across services. Since the start of the Covid-19 pandemic, 114,550 positive cases and 646 deaths (194.6 people per 100,000 people) have been recorded within the borough, lower than the regional (283 people per 100,000) and national (326.4 people per 100,000) figures<sup>59</sup>.

In total, 604,248 vaccinations have been given – 238,909 people have received one dose (66.1% of 12+ year olds), 218,819 people have received two doses (60.5% of 12+ year olds) and 146,520 (40.5% of 12+ year olds) have received either a booster or a third dose<sup>46</sup>. The uptake of vaccinations is lower than the national average (78.1% one dose, 74.5% two doses and 59.2% booster or a third dose) and regional averages (68.1% one dose, 64% two doses and 46.8% booster or a third dose)<sup>59</sup>.

Fuel poverty is determined if a household has required fuel costs that are above average (the national median level) and were they to spend that amount, they would be left with a

<sup>59</sup> UK Government (2022). Coronavirus (COVID-19) in the UK – Cases in Tower Hamlets. [online] Available at: <https://coronavirus.data.gov.uk/details/cases?areaType=ltla&areaName=Stockport>

residual income below the official poverty line<sup>60</sup>. 14.2% of households in LBTH are estimated to be in fuel poverty, compared to the national average of 13.4%<sup>61</sup>.

### **Future Trends And Evolution Of The Baseline Without The NLP**

The increasing population of LBTH and the observed active nature of its adults will likely result in increased demand for exercise facilities and open access outdoor space.

Social isolation and loneliness are also likely to become more prevalent in LBTH as more people work from home, particularly due to and following the COVID-19 pandemic. This has the potential to undermine well-being, thereby impacting negatively on people's quality of life. Social isolation and loneliness are also associated with increasing the likelihood of sensory and mobility impairments and deteriorating health.

Covid-19 has also exacerbated existing inequalities in LBTH. Without preparedness and effective response to resurgence of Covid-19, including increased vaccine rollout, issues such as social isolation and loneliness could be exacerbated. The rising cost of living, or 'Cost-of-Living Crisis', is also predicted to impact those with pre-existing mental health problems, as they are among those at greatest risk<sup>62</sup>. It is well documented that recessions increase social inequalities, which are drivers of poor mental health<sup>63</sup>.

The prevalence of obesity in Year 6 children is also a concern that must be addressed, without healthy child weight strategies these particularly bad health incomes for children will persist.

The anticipated population growth and the increasing affordability and convenience of car travel is likely to result in an increase in the number of private vehicles on the roads. This could have cumulative effects on air quality, noise pollution and public health if current trends continue.

Air pollution has been linked to diabetes and dementia – both chronic illnesses in the UK are expected to rise in future. Increased mortality and morbidity amongst diabetics are associated with increased NO<sub>2</sub> concentrations with long term exposure to traffic borne air

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<sup>60</sup> Department for Business, Energy & Industrial Strategy. Fuel Poverty Statistics. Available at: <https://www.gov.uk/government/collections/fuel-poverty-statistics>

<sup>61</sup> Department for Business, Energy & Industrial Strategy. Sub-regional fuel poverty data 2021. Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021>

<sup>62</sup> Mental Health Foundation (2023) Mental Health and the Cost-of-Living Crisis: Another pandemic in the making? Available at: <https://www.mentalhealth.org.uk/our-work/policy-and-advocacy/mental-health-and-cost-of-living-crisis-report>

<sup>63</sup> Wahlbeck, K. & McDavid, D. (2012), 'Actions to alleviate the mental health impact of the economic crisis', World Psychiatry Available at: <https://doi.org/10.1002/j.2051-5545.2012.tb00114.x>

pollution positively correlating with incidence of type two diabetes and increased mortality among diabetics<sup>64</sup>.

In 2022, the government published the Levelling Up white paper<sup>65</sup>, setting out a broad approach to rebalancing the UK economy and addressing significant regional inequalities that restrict people, places, and prosperity. If the Levelling Up and Regeneration Bill come into force, there is potential to reduce inequalities within the borough, improving health outcomes.

Due to the population density within the borough and high number of high-rise buildings, the urban heat island effect is a prevalent issue in the borough. The urban heat island effect reduces the ability for cities to cool subsequently having adverse effects on health the health of the local populations, particularly for more those vulnerable groups such as older people, young children and those with pre-existing health conditions such as asthma and/or cardiovascular disease.

In addition to the urban heat island effect, climate change is projected to increase the probability of overheating in London<sup>66</sup>. As the population increases and the effects of climate change become more prevalent, there is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.

Without a NLP it is likely that health issues within the borough will continue to persist. The plan would allow for LBTH to better target community services, greenspaces and sports/recreational facilities to the areas where growth is most likely to occur and/or aid in better dispersing the projected growth in population across more of the borough. This will also help to support community cohesion and reduce isolation.

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<sup>64</sup> Committee on the Medical Effects of Air Pollutants (COMEAP), The Mortality Effects of Long-Term Exposure to Particulate Air Pollution in the United Kingdom, 2010, [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/304641/COMEAP\\_mortality\\_effects\\_of\\_long\\_term\\_exposure.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/304641/COMEAP_mortality_effects_of_long_term_exposure.pdf)

<sup>65</sup> Department for Levelling Up, Housing and Communities, Levelling Up and Regeneration [online] available at: <https://www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information>

<sup>66</sup> Kolokotroni, M et al, London's urban heat island: Impact on current and future energy consumption in office buildings, Energy and Buildings Volume 47, 2012 [online] available at: <https://www.sciencedirect.com/science/article/pii/S0378778811006293?via%3Dihub>

## Issues and Opportunities

Issues and opportunities for human health and the implications for the NLP have been identified in **Table D-2**.

**Table D-2 – Issues and Opportunities for Human Health**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ LBTH’s reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness, smoking, and STI treatment;</li> <li>■ There are significant health inequalities amongst residents in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents;</li> <li>■ Covid-19 has also exacerbated existing inequalities in the borough;</li> <li>■ There are high levels of obesity within children aged 10-11 years; and</li> <li>■ The urban heat island effect is having adverse effects on the health of the local population, particularly those more vulnerable groups.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP should maximise opportunities to enhance walking and cycling routes and encourage the use of non-motorised forms of transport. This will help to improve levels of physical activity within the borough;</li> <li>■ There will be a need to improve public transport users’ confidence in returning to public transport post-Covid19;</li> <li>■ The NLP should ensure developments contribute positively to accessible neighbourhoods, reducing health inequalities in accessibility;</li> <li>■ There will be an ongoing need to provide services and affordable housing facilities in order to meet the needs of younger residents;</li> <li>■ There is a need for the NLP address issues with inequalities and ‘level up’ the borough following the Covid-19 pandemic;</li> <li>■ There is a requirement for implementation of healthy child weight initiatives;</li> <li>■ The NLP should provide early support for individuals at risk of loneliness and subsequent poor mental health, treating them with the same level of care as physical conditions;</li> <li>■ There is a need to provide more greenspaces and high quality public</li> </ul>

Key Risks/Opportunities	Implications for the NLP
	<p>realm which can provide social spaces; and</p> <ul style="list-style-type: none"> <li>There is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.</li> </ul>

## Economy and Employment

### Summary of Current Baseline

In 2021, 76.9% of the population within the LBTH were of working age (between 16-64 years) which is slightly higher than both the regional and national averages of 70.0% and 64.2% respectively<sup>33</sup>. Employment rates for people of working age (between 16-64 years) is in line with but slightly lower than the regional average (75.8%) and national average (75.7%) at 72.8%. Between 2011 and 2021, there has been a 2.0% increase in the number of economically active people in the borough<sup>67</sup>.

LBTH has a diverse employment market, with large clusters of offices in Canary Wharf and the City Fringe, and industrial areas that provide logistics support for the whole of Central London. In 2017, LBTH economic output was £29.7bn, with the economy growing by 49% across the decade prior<sup>68</sup>.

This brings a significant amount of employment opportunities, with job density in LBTH recorded as 1.31 which is higher than the regional job density of 1.02 and significantly higher than the national job density of 0.85<sup>69</sup>.

Despite this, LBTH has a relatively high economic inactivity rate. From 2021 to 2022, 24.5% of the borough’s working age population were economically inactive, compared to 20.6% in London and 21.6% in Great Britain<sup>69</sup>. There is also gender disparity in the economically active population, with 25.4% more males than females economically active.

<sup>67</sup> Office for National Statistics. Employment in local authorities, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/employmentinlocalauthoritiesenglandandwales/census2021>

<sup>68</sup> Tower Hamlets Council (2020) Borough Profile 2020: Economy. Available at: [https://www.towerhamlets.gov.uk/lgnl/community\\_and\\_living/borough\\_statistics/Borough\\_profile.aspx](https://www.towerhamlets.gov.uk/lgnl/community_and_living/borough_statistics/Borough_profile.aspx)

<sup>69</sup> Nomis (2021) Labour Market Profile. Available online at: <https://www.nomisweb.co.uk/reports/lmp/la/contents.aspx>

As of 2021, there are 311,000 jobs in LBTH<sup>69</sup>, however the vast majority are filled by non-residents and employees commuting from outside the borough<sup>70</sup>, with approximately 15% taken by local residents<sup>71</sup>. The borough's daytime population increases by about 60% as a result of the large working weekday population<sup>72</sup>. However, since the Covid-19 pandemic, 50.3% of people aged 16+ in employment in the borough work mainly at or from home<sup>73</sup>.

LBTH performs better than the medium for gross median weekly pay (£718.70) compared to the regional average (£645.80) and national average (£536.60)<sup>74</sup>. Gross disposable household income (GDPI) per head is however considerably lower than the regional average (£29,890) at £26,175, but significantly higher than the national average £21,962.

LBTH has a high level of productivity, with £112,559 gross value added (GVA) per head in 2020 which is higher than the London average of £52,239 GVA per head<sup>75</sup>. However, although this has increased by 9.8% since 2015, it has decreased by 10.8% since 2017. Despite this, GVA in LBTH is significantly higher than the 2020 national average of £29,757 per head.

**Table D-3** shows the borough's key economic sectors compared to regional and national averages. Financial and insurance activities are the largest economic sector in the LBTH, with a higher employment rate than the regional and national averages. This is followed by professional, scientific and technical activities, information and communication, administrative and support services activities, human health and social work activities, education and wholesale and retail trade.

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<sup>70</sup> Tower Hamlets Council (2019) London Borough of Tower Hamlets: Third Local Implementation Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=143901>

<sup>71</sup> Canary Wharf Group & Elba (2022) PEG: Economy, Cost of Living and Levelling Up. Available at: <https://www.towerhamlets.gov.uk/thp/ITEM-3-Economy-cost-of-living-and-levelling-up.pdf>

<sup>72</sup> Office for National Statistics (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021>

<sup>73</sup> Tower Hamlets Council (2011) Tower Hamlets Employment Strategy. Available at <https://democracy.towerhamlets.gov.uk/documents/s21806/>

<sup>74</sup> Office for National Statistics (2023) Subnational indicators dataset. Available online at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/subnationalindicatorsdataset>

<sup>75</sup> Office for National Statistics (2022) Regional gross value added (balanced) per head and income components. Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/nominalregionalgrossvalueaddedbalancedperheadandincomecomponents>

**Table D-3 – Employment by Economic Sector (%)<sup>69</sup>**

Industry	Tower Hamlets (%)	London (%)	Great Britain (%)
B : Mining And Quarrying	0.0	0.0	0.1
C : Manufacturing	0.9	2.1	7.6
D : Electricity, Gas, Steam And Air Conditioning Supply	0.2	0.4	0.4
E : Water Supply; Sewerage, Waste Management And Remediation Activities	0.1	0.3	0.7
F : Construction	1.7	3.5	4.9
G : Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	6.2	11.5	14.4
H : Transportation And Storage	2.1	4.3	5.1
I : Accommodation And Food Service Activities	5.2	7.4	7.5
J : Information And Communication	10.0	8.4	4.5
K : Financial And Insurance Activities	23.7	8.0	3.6
L : Real Estate Activities	2.1	2.5	1.8
M : Professional, Scientific And Technical Activities	16.8	14.2	8.9
N : Administrative And Support Service Activities	9.6	9.7	8.9

Industry	Tower Hamlets (%)	London (%)	Great Britain (%)
O : Public Administration And Defence; Compulsory Social Security	4.1	4.6	4.6
P : Education	6.2	7.3	8.8
Q : Human Health And Social Work Activities	7.6	10.6	13.7
R : Arts, Entertainment And Recreation	1.5	2.8	2.3
S : Other Service Activities	1.5	2.5	1.9

The financial and insurance industry is the largest in LBTH based on the number of jobs, accounting for 23.7% of roles in the borough. The high level of employment in professional, scientific and technical industries is not surprising given that the borough's population are highly skilled.

Of the population in LBTH, 52.1% have obtained level 4 qualifications or above which is higher than the national average by 8.4%<sup>69</sup>. However, the percentage of the population with no qualifications is in line with the national average (6.6%) at 6.5%, and higher than the regional average of 5.5%.

The Covid-19 crisis impacted nearly all residents and local businesses in the borough. LBTH has implemented the Mayor's Covid Recovery Fund initiative, a multi-million-pound scheme to kickstart the economic, health and social recovery from Covid-19<sup>76</sup>. It consists of grants to support the recovery of residents, businesses, and community organisations from the impact of the pandemic, supporting 25 vital projects in the borough. The pandemic has also changed the way people are working with many employers now allowing employees to work from home, increasing flexibility and resilience in the workforce.

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<sup>76</sup> Tower Hamlets Council (2021) £3million boost to kickstart the borough's path out of the pandemic. Available at: [https://www.towerhamlets.gov.uk/News\\_events/2021/July-2021/3million-boost-to-kickstart-the-boroughs-path-out-of-the-pandemic.aspx](https://www.towerhamlets.gov.uk/News_events/2021/July-2021/3million-boost-to-kickstart-the-boroughs-path-out-of-the-pandemic.aspx)

In March 2020, in line with the Equalities Act 2010, the gender pay gap figures for women in LBTH were that they were earning 92.83% of the average (mean) pay of men<sup>75</sup>. However, there is no one reason behind the gender pay gap, with caring responsibilities, a divided labour market, discrimination, and men tending to work in senior roles all contributing factors.

## **Future Trends and evolution of the baseline without the NLP**

The rising population in the region is accelerating the need for the delivery of additional housing, services, and infrastructure. Growth in jobs is also anticipated in order to close the gap between increases in population and the need for employment. There is a need for improving accessibility to these jobs and training opportunities, particularly given that the levels of non-resident workers commuting into LBTH is significant.

The population is becoming younger, and the working age is increasing. However, the working age population has a relatively high economic inactivity rate. The increase in the percentage of the population that is of working age is expected to increase local economic activity levels and the supply of labour.

A NLP would allow for the delivery of new employment opportunities within the borough that are more targeted to the specific residents' needs and will help to tackle economic inactivity. The construction of new development will provide opportunities for employment within the borough. In addition to this, new developments will help to maximise social value outcomes for the local community by considering benefits to existing residents, businesses and other stakeholders as well as those expected to use the new development.

During and since the Covid-19 pandemic, homeworking has been encouraged for those who are able, changing the way people work. This trend will likely continue as employers look to maintain flexible working conditions in future. However, with the Cost-of-Living Crisis and rising energy bills, this is difficult for some households to maintain, not helped by 29,000 employees earning less than the London Living Wage (LLW)<sup>71</sup>.

Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. This issue may not be addressed without the presence of the local plan and specific developments and policies targeting town centres and high streets.

## Issues and Opportunities

Issues and opportunities for economy and employment and the implications for the NLP have been identified in **Table D-4**.

**Table D-4 – Issues and Opportunities for Economy and Employment**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ LBTH is a major location for employment in London, attracting a large daytime population of workers;</li> <li>■ Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount are employed. Employed residents in LBTH have a higher gross value added (GVA) per head and gross weekly pay;</li> <li>■ However, there is a higher economic activity rate, with more males economically active than females;</li> <li>■ This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents;</li> <li>■ It is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough; and</li> <li>■ Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP should endeavour to improve connectivity between business clusters and housing markets (both planned and existing) in the borough, which will help to improve access to the skills pool as well supporting improvements in productivity;</li> <li>■ The NLP should support the development of new employment sites and maintain vitality in key centres;</li> <li>■ The NLP should seek to boost jobs and business, by supporting small businesses, start-ups, and markets, and creating jobs and training opportunities;</li> <li>■ The NLP should encourage new developments to maximise social value benefits; and</li> <li>■ The NLP should maintain the vitality and attractiveness of town centres by supporting their recovery from Covid-19 through the provision and protection of retail, shops, and businesses, with the provision of affordable retail and commercial space encouraged.</li> </ul>

## Housing

### Summary of Current Baseline

LBTH position within London and its good transport links make it attractive to commuters and non-resident workers. However, this puts pressure on house prices. People from outside the area buying houses closer to work to shorten commuting time, limits the availability of housing that is affordable for younger buyers 'First Homes' and/or those on lower incomes.

House prices in LBTH have increased by 9.6% between January 2022 and January 2023, from £445,861 to £488,833<sup>77</sup>. This is substantially higher than the England average of £310,159 (January 2023). However, house prices in LBTH are lower than the London average of £533,986. Annual price changes of a property in LBTH (9.6%) are significantly higher than both London (3.2%) and England (6.9%). The average house price in LBTH has increased by £118,333 since April 2013<sup>78</sup>.

**Figure D-3** compares the average house prices (as of January 2023) of the surrounding local authorities<sup>79</sup>. This shows that of the 32 London boroughs, and the City of London, that make up London, Barking and Dagenham has the lowest average house prices. Kensington and Chelsea have significantly higher average house prices compared to the other local authorities in London. LBTH is the 21<sup>st</sup> least affordable borough in London. The sales volume for LBTH has decreased from November 2021 (245 sales) to November 2022 (185 sales), as it has for London over the same period (8,130 sales to 6,129 sales).

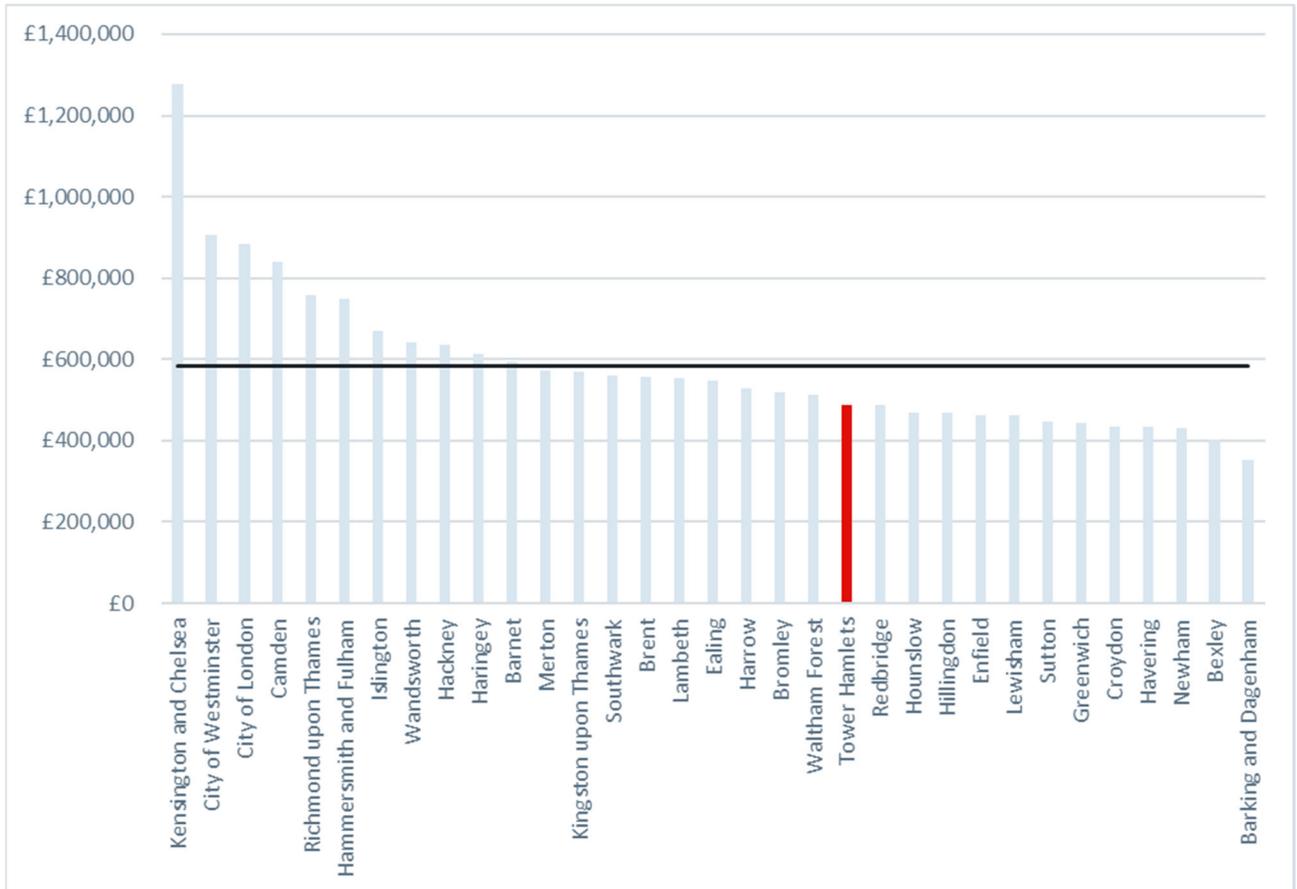
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<sup>77</sup> HM Land Registry (2023) UK House Price Index England: January 2023. Available at: <https://www.gov.uk/government/statistics/uk-house-price-index-for-january-2023/uk-house-price-index-england-january-2023>

<sup>78</sup> Tower Hamlets Council (2013) House prices: Private rental market and House price trends in Tower Hamlets. Available at: [https://www.towerhamlets.gov.uk/lgnl/community\\_and\\_living/borough\\_statistics/housing.aspx](https://www.towerhamlets.gov.uk/lgnl/community_and_living/borough_statistics/housing.aspx)

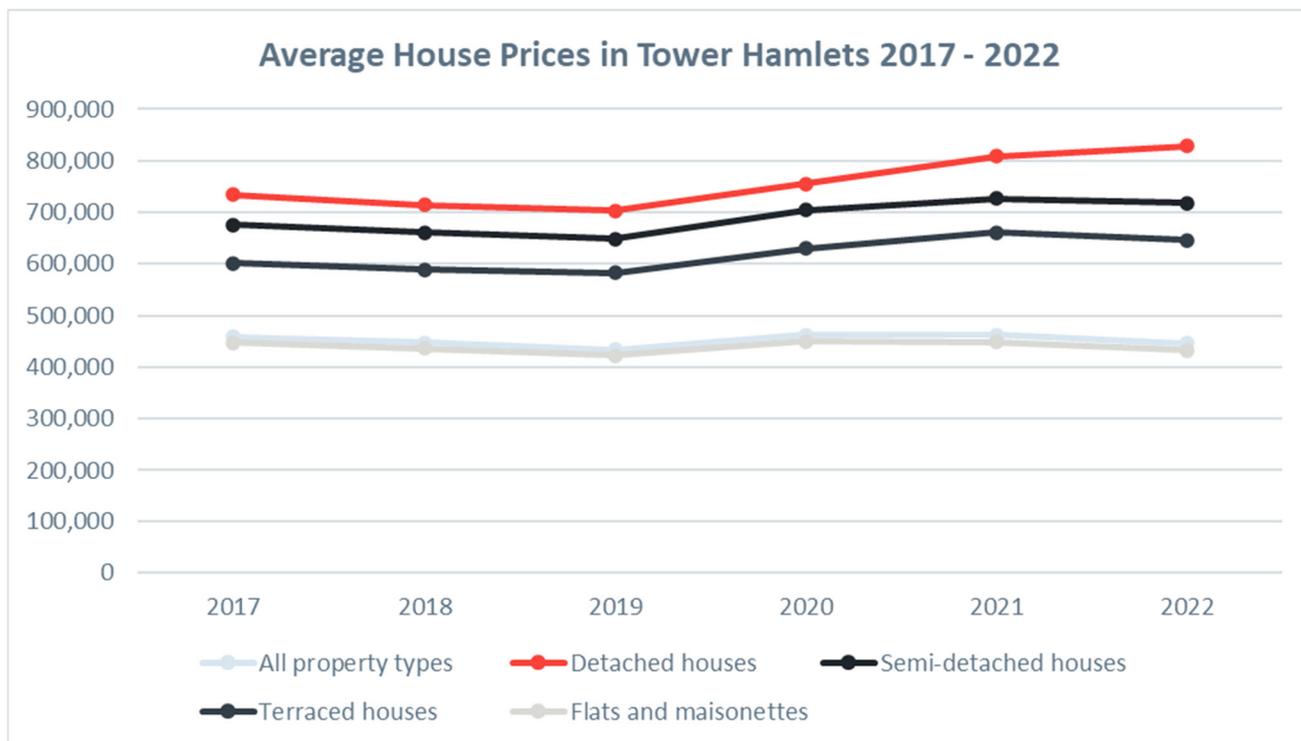
<sup>79</sup> Land Registry Data (2023) UK House Price Index. Available at: <https://landregistry.data.gov.uk/app/ukhpi>

**Figure D-3 – Average House Prices by Local Authority Area<sup>79</sup>**



**Figure D-4** overleaf shows the changes in property prices in LBTH across the different housing types since 2017. Overall, prices have increased for detached houses, semi-detached houses, and terrace houses, with detached housing seeing the largest increase, especially during and after the Covid-19 pandemic hit in 2020, where homes with more space and a garden become more of a priority. All property types and flats and maisonettes have plateaued.

**Figure D-4 – Average House Prices in Tower Hamlets (2017-2022)<sup>79</sup>**



*\*Average house prices based on January values*

The average mean salary in 2022 in LBTH was £46,716<sup>80</sup>. According To Tower Hamlet’s draft Local Housing Needs Assessment (LHNA)<sup>81</sup>, in order to be able to buy a property in the borough (assuming a 10% deposit), the estimated annual household income required is £75,000. This increases to £82,000 within the City Fringe area and £98,000 in the Isle of Dogs and South Poplar area.

In terms of renting privately, the estimated annual household income required to rent in the borough is £56,600. Again, this increases to £60,000 in the City Fringe area and £64,000 in Isle of Dogs and South Poplar area.

The LHNA has identified that 29,000 households in need of housing. The greatest proportion of those in need of housing (66.1%) is due to overcrowding. Over three-quarters of those households in need are unlikely to be able to afford market housing to buy or rent and therefore there is a current need from 22,515 households. As of November 2022, there were over 12,000 claimants of housing benefit, which has increased since Covid-19 <sup>67</sup>.

<sup>80</sup> Annual Survey of Hours and Earnings (ASHE) 2023 [online] available at: <https://www.ons.gov.uk/surveys/informationforbusinesses/businesssurveys/annualsurveyofhoursandearningsashe>

<sup>81</sup> Icenl on behalf of Tower Hamlets, Draft Local Housing Needs Assessment, 2023

The primary underlying reason for homelessness within LBTH is the lack of affordable accommodation. LBTH has a statutory responsibility under the Homelessness Reduction Act 2017<sup>82</sup> to provide advice and information about homelessness and the prevention of homelessness within the borough. Out of 610 total initial assessments, 265 households in LBTH were threatened with homelessness between July-September 2022<sup>83</sup>. As of 2017/18, 375 people were rough sleeping in LBTH as identified in the Homelessness and Rough Sleeping Strategy 2018-2023<sup>84</sup>.

LBTH is seeking to provide more affordable housing and their Housing Strategy 2016-21 (Section 4 – Delivery Theme 1) states that the council has a strategic target of affordable housing of 50% from all new housing developments<sup>85</sup>. The Strategic Plan 2022-26 develops upon this, indicating that LBTH will work with developers and housing associations to deliver a minimum of 1000 social homes for rent each year.

### Future Trends And Evolution Of The Baseline Without The NLP

The London Plan 2021 **Error! Bookmark not defined.** has identified a 10-year housing supply target of 34,730 new homes for LBTH (2019/20 -2028/29). In 2018, LBTH identified a need for over 54,000 new homes expected to be built in the borough by 2030/31<sup>38</sup>, with the majority of projected units in the Canary Wharf ward.

LBTH's population becoming younger and more diverse is happening at a higher rate than regional and national averages. Projections show that almost half of the population will be aged 20-39 by mid-2028. Therefore, the demand on affordable housing will increase.

There is also an increased risk of homelessness due to the effects of the decline in incomes that have resulted from the pandemic and the increased cost of living. There were 2,690 people estimated to be sleeping rough on a single night in autumn in 2020 (during the pandemic)<sup>86</sup>. This declined by 9% in 2021, however, the levels of homelessness in England are still 38% higher than 2010 levels. Providing affordable housing is critical to tackling homelessness, among other issues such as overcrowding.

The current cost of living crisis in the UK is set to continue, which is likely to reduce residents' disposable income, particularly if inflation continues to outstrip increases in

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<sup>82</sup> Legislation.gov.uk (2017) Homelessness Reduction Act 2017. Available at: <https://www.legislation.gov.uk/ukpga/2017/13/contents/enacted>

<sup>83</sup> Gov.uk (2023) Tables on homelessness. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

<sup>84</sup> Tower Hamlets Council (2018) Homelessness and Rough Sleeping Strategy 2018-2023 [https://www.towerhamlets.gov.uk/Documents/Homelessness\\_and\\_Rough\\_Sleeping\\_Strategy\\_2018\\_2023.pdf](https://www.towerhamlets.gov.uk/Documents/Homelessness_and_Rough_Sleeping_Strategy_2018_2023.pdf)

<sup>85</sup> Tower Hamlets Council (2016) London Borough of Tower Hamlets 2016-21 Housing Strategy [https://www.towerhamlets.gov.uk/Documents/Housing/THHF/TH\\_Housing\\_Strategy\\_document\\_v5.pdf](https://www.towerhamlets.gov.uk/Documents/Housing/THHF/TH_Housing_Strategy_document_v5.pdf)

<sup>86</sup> Department for Levelling UP, Housing & Communities (2022) Official Statistics – Rough sleeping snapshot in England: autumn 2021. Available at: <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2021/rough-sleeping-snapshot-in-england-autumn-2021>

nominal wages. The Bank of England has forecasted that real household disposable income fell by 2.5% in 2022 and is anticipated to fall by a further 2.6% in 2023<sup>87</sup>. Wage growth in the last year has not been sufficient to keep pace with inflation, with underlying pay growth of only 4% in February 2022.

Rising costs of living is likely to widen levels of inequality in the borough. However, with the Levelling Up and Regeneration Bill that have come into force, there is potential to reduce inequalities within the borough, although, this will be highly dependent upon the schemes and initiatives that come forward.

The absence of the NLP would not halt the delivery of housing in borough as applications for planning permission would be determined in accordance with both the NPPF and the London Plan. However, without specific local policies guiding the quantum, type and location of new development, the extent to which new development meets the needs of the Borough would be more uncertain. This could give rise to inappropriately located developments and missed opportunities to tackle deprivation, affordability and provide community services and facilities.

### Issues and Opportunities

Issues and opportunities for housing and the implications for the NLP have been identified in **Table D-5**.

**Table D-5 – Issues and Opportunities for Housing**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ There is significant need for affordable properties to buy and rent, however rising costs of living and above average house prices are affecting the number of residents able to afford to buy;</li> <li>■ There are significant levels of overcrowding in the borough with 66% of those in need of housing currently living in overcrowded conditions;</li> <li>■ The Covid-19 pandemic and rising cost of living are increasing levels of homelessness; and</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP will need to ensure housing requirements are being worked towards, especially by expanding increasing the availability of affordable housing.</li> <li>■ The NLP will need to consider differing population needs, including the demands of a young and diverse population.</li> </ul>

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<sup>87</sup> Institute for Government, Cost of Living Crisis, [online] available at: <https://www.instituteforgovernment.org.uk/explainers/cost-living-crisis>

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>▪ The lack of affordable housing, means that young people and/or lower income groups are missing out.</li> </ul>	

## Crime and Safety

### Summary of Current Baseline

Ensuring community safety is key for achieving a positive state of well-being among people within social and physical environments. It is as much about reducing and preventing crime as it is about building strong and vibrant communities. This means the perception of safety within the borough’s communities is as important as measuring crime rates.

The number of casualties in LBTH killed and seriously injured (KSI) on roads for 2021 was 302.1 people (per 100,000 resident population)<sup>57</sup>. This is higher and worse than both the regional (194.0 people per 100,000) and the national (95.6 people per 100,000) averages.

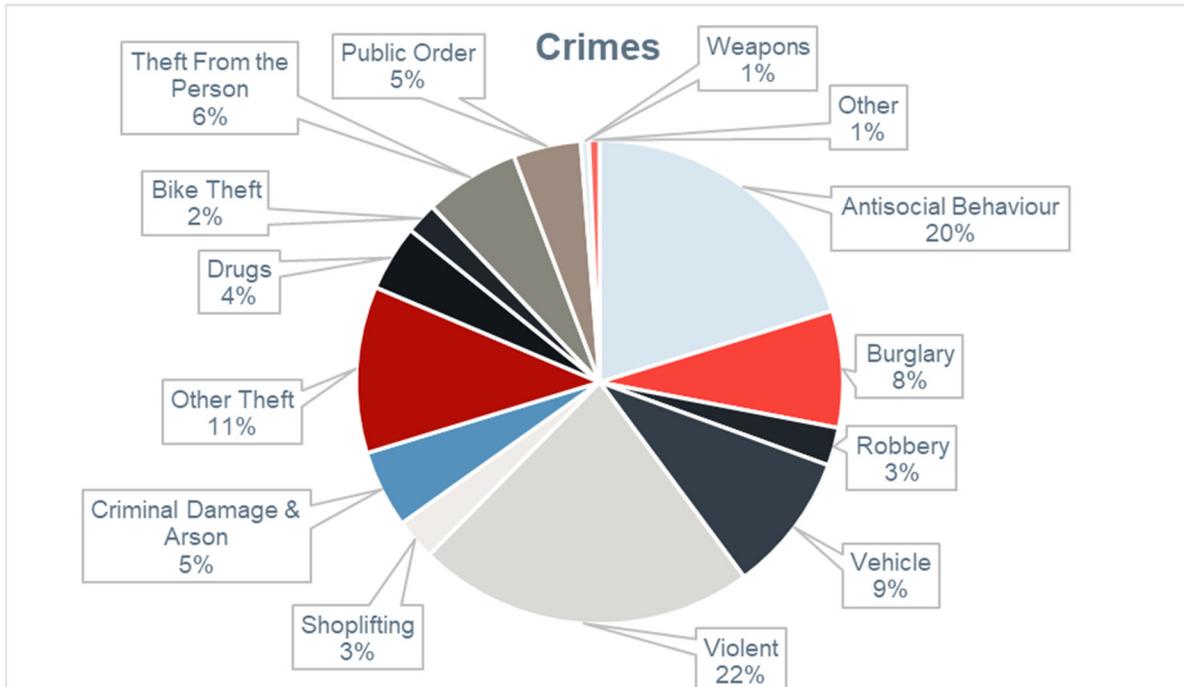
Crime rates in LBTH are high, with over 127.5 crimes per 1,000 people in the last year (February 2022-February 2023)<sup>88</sup>, making the borough among the top 10 most dangerous London boroughs, and 6% more dangerous than the average for London<sup>89</sup>.

As of January 2023, the most dominant crime in LBTH was violent crime, with antisocial behaviour (ASB) the second highest reported crime. Hospital admissions for violence (including sexual violence) are higher than the regional (44.3 per 100,000 people) at 59.9 admissions per 100,000<sup>57</sup>. **Figure D-5** shows the current crime breakdown for LBTH.

<sup>88</sup> Metropolitan Police Service (2023) Monthly Crime Data New Cats. Available at: <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>

<sup>89</sup> CrimeRate. Tower Hamlets Crime Statistics. Available online at: <https://crimerate.co.uk/london/tower-hamlets>

Figure D-5 - Crime Breakdown for Tower Hamlets January 2023<sup>90</sup>.



According to IMD19<sup>42</sup>, LBTH is ranked 28th out of 317 local authorities nationally (where 1 is the most deprived), placing it within the top 10% of most deprived local authorities nationally. Of the 144 LSOAs in LBTH, 31 are in the top 10% and a further 72 are top 20% of most deprived neighbourhoods nationally. With regards to crime deprivation, 25% of the 120 LSOAs in LBTH are in the most deprived 10% of LSOAs in the UK.

The main focus of Tower Hamlets Community Safety Partnership Plan 2021-2024<sup>91</sup> is to reduce crime and anti-social behaviour by working to prevent crime and disorder, address substance misuse, reduce reoffending, and support young and vulnerable people from being drawn into extremist behaviour. Community Safety Partnerships are a requirement of the Crime and Disorder Act 1998<sup>92</sup>.

<sup>90</sup> UK Crime Stats – Tower Hamlets 2023 [online] Available at: <https://www.ukcrimestats.com/Subdivisions/LBO/11185/>

<sup>91</sup> Tower Hamlets Community Safety Partnership Plan 2021-2024 (2021) Available at: [https://www.towerhamlets.gov.uk/lgnl/community\\_and\\_living/community\\_safety\\_crime\\_preve/anti-social\\_behaviour/community\\_safety\\_partnership/csp-plan.aspx](https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_safety_crime_preve/anti-social_behaviour/community_safety_partnership/csp-plan.aspx)

<sup>92</sup> Legislation.gov.uk, 1998. Crime and Disorder Act 1998. Available at: <https://www.legislation.gov.uk/ukpga/1998/37/contents>

## Future Trends And Evolution Of The Baseline Without The Nlp

It is predicted that crime rates will likely increase post Covid-19<sup>93</sup>, with increases in anti-social behaviour and violent crime rates, including sexual assault and domestic abuse, seeing the largest increases. The Council's Strategic Plan 2021-2026 (Priority 6: Empower Communities and Fight Crime) outlines that the LBTH will assist with more council-funded uniformed police officers to tackle crime.

As the population of LBTH increases, there are expected to be a greater number of vehicles on the borough's roads, which may result in an increase in the number of accidents and those KSI on roads. LBTH implements a number of road safety measures to support prevention of collision. These include<sup>94</sup>:

- Providing road safety education in schools;
- Providing road safety information to members of the public;
- Promoting the children's traffic club;
- Running the junior road safety officers club; and
- Providing and managing the school crossing patrol service.

A new Local Plan could better support improvements to community areas and facilities to aid in reducing crime and anti-social behaviour and increase opportunities for community cohesion.

### Issues and Opportunities

Issues and opportunities for crime and safety and the implications for the NLP have been identified in **Table D-6**.

**Table D-6 – Issues and Opportunities for Crime and Safety**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ There is potential to increase engagement within communities to encourage the reporting of crimes;</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP will need to ensure improvements to community areas to aid in reducing crime and anti-social behaviour;</li> </ul>

<sup>93</sup> Office for National Statistics, 2022. Crime in England and Wales: year ending March 2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmarch2022>

<sup>94</sup> Tower Hamlets Council. Road Safety. Available online at: [https://www.towerhamlets.gov.uk/lgnl/transport\\_and\\_streets/road\\_safety/road\\_safety.aspx](https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/road_safety/road_safety.aspx)

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour;</li> <li>■ There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours;</li> <li>■ As the population within LBTH increases there are expected to be a greater number of vehicles on the borough’s roads, which may result in an increase in the number of accidents and those KSI on roads;</li> <li>■ Children in the most deprived neighbourhoods are nearly three times more likely to be KSI as a pedestrian compared to non-deprived neighbourhoods<sup>95</sup>;</li> <li>■ There are opportunities to increase the safety of active transport modes such as cycling and walking;</li> <li>■ Vulnerable road users such as cyclists and pedestrians are more likely to be casualties; and</li> <li>■ There is potential to increase the standards and safety of housing within the borough.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP will need to ensure improvements to transport networks, including improving lighting, to ensure safety on networks; and</li> <li>■ The NLP should seek opportunities to increase the safety of active transport modes such as cycling and walking.</li> </ul>

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<sup>95</sup> Centre for Transport Studies, Road Safety Research Briefing 1: Children and Traffic: Those in deprived areas still at disproportionate risk. Available online at: <https://www.ucl.ac.uk/transport/sites/transport/files/deprivation-and-road-safety-children.pdf>

## Transport and Accessibility

### Summary of Current Baseline

LBTH has excellent transport links and is a well-connected borough. The borough has access to the London Underground, Docklands Light Railway (DLR), National Rail connections, and the Elizabeth Line at Whitechapel and Canary Wharf stations. The DLR is a fully accessible railway, with stations having lift or ramp access to platforms. The borough has invested in making connections and access to stations more attractive, pleasant and easier to use<sup>96</sup>.

Generally, the borough has relatively high Public Transport Accessibility Levels (PTALS). The southwest of the borough, in Spitalfields and Whitechapel, there are 'best' PTALS of 6b<sup>97</sup>. Patchy areas traversing the north and south, in areas such as Bow, north of Poplar, and Isle of Dogs have lower PTAL outputs of 1a, indicating a lower rating by distance from frequent public transport services.

There is an extensive highways network throughout the borough, traversed by trunk roads such as the A11, A12 and A13 which carry large numbers of vehicles. The borough also benefits from 11km of cycle tracks along roads physically separated from traffic and pedestrians. There are about 53km of dedicated cycle routes in the borough (11km of which are physically separated from traffic and pedestrians) and 32.5km of pedestrian walkways<sup>98</sup>.

LBTH is also within close proximity of major airports, including London City Airport (approx. 3.5 miles), London Heathrow (approx. 17 miles), and London Gatwick (approx. 25 miles).

As of 2021, there were approximately 45,768<sup>99</sup> registered cars in LBTH<sup>100</sup>, which represents an increase of +7.4% since 2019. The number of licenced vehicles in London also increased over this period, but by a greater percentage of +9.8%.

The borough is attempting to expand its electric vehicle (EV) charging infrastructure to support its net zero ambitions and air pollution reduction targets, along with associated health benefits. The demand for EVs in the borough is high and growing, making investment

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<sup>96</sup> Tower Hamlets Council (2019) London Borough of Tower Hamlets Third Local Implementation Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=143901>

<sup>97</sup> Transport for London, WebCAT. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

<sup>98</sup> Sustrans, Bike Life – Tower Hamlets, 2019 [online] available at: [https://www.sustrans.org.uk/media/5954/bikelife19\\_tower-hamlets\\_web.pdf](https://www.sustrans.org.uk/media/5954/bikelife19_tower-hamlets_web.pdf)

<sup>99</sup> Vehicles are allocated to a local authority according to the postcode of the registered keeper. This is the keeper's address for privately owned vehicles or the company's registered address for company owned vehicles. The address does not necessarily reflect where the vehicle is located. This is especially true for large fleets kept by companies involved with vehicle management, leasing or rentals.

<sup>100</sup> London Datastore (2021) Department for Transport, Licensed Vehicles - Type, Borough. Available at: <https://data.london.gov.uk/dataset/licensed-vehicles-type-0>

in the network paramount. Since 2018, LBTH have installed 23 fast charging points<sup>101</sup>, with the majority in the borough comprising Type 2 (5kW) chargers<sup>102</sup>.

Despite LBTH having the third highest (66%) annual growth in EV registrations in inner London, the borough has the fourth highest (65%) of households more than 5 minutes walk from the nearest charger in inner London<sup>103</sup>. There are evidently accessibility issues that need to be resolved to meet the needs of the growth of EVs in the borough.

The vast majority of jobs in LBTH are filled by non-residents and employees commuting from outside the borough, causing a major problem with congestion through LBTH. Excessive road traffic leads to congestion, air and noise pollution and contributes further to climate change. Provisional estimates show motor vehicles travelled 299.3 billion vehicle miles in Great Britain in 2021 which was 16.1% lower than pre Covid-19 levels (the year ending December 2019)<sup>104</sup>. Government policy is focusing on promoting sustainable transport and encouraging walking and cycling for those journeys where these are realistic alternatives.

Since the Covid-19 pandemic the way people travel has changed, especially with 50.3% of people now working mainly at or from home<sup>105</sup>. The borough has good levels of sustainable travel, with the borough coming 7th out of the London boroughs on the Healthy Streets Scorecard in 2022<sup>106</sup>. The Healthy Streets Scorecard ranks London boroughs on how healthy their streets are according to ten indicators. However, this may change with the consultation on Low Traffic Neighbourhoods (LTNs) undertaken in January 2023 in the borough<sup>107</sup>.

The most popular method of travel to work in LBTH is by train, underground, metro, light rail, or tram, with over 60.9% of residents using this mode of public transport<sup>108</sup>. This is lower than the London average where 15.2% use this method of travel to work and may be the result of 42.1% of people working mainly at or from home. Comparing the most popular

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<sup>101</sup> [Electric vehicle charging in Tower Hamlets | Let's Talk Tower Hamlets](#)

<sup>102</sup> [Map of electric charging points for electric cars UK: Zapmap \(zap-map.com\)](#)

<sup>103</sup> Tower Hamlets Council. Charging Forward. Tower Hamlets electric vehicle delivery plan: 2021-2025. Available at: [Tower Hamlets electric vehicle delivery plan: 2021-2025 \(amazonaws.com\)](#)

<sup>104</sup> Department for Transport (2021) Provisional road traffic estimates, Great Britain: October 2020 to September 2021 Available at: <https://www.gov.uk/government/statistics/provisional-road-traffic-estimates-great-britain-october-2020-to-september-2021#:~:text=Provisional%20estimates%20show%20motor%20vehicles,%2C%20an%20increase%20of%200.4%25>

<sup>105</sup> Office for National Statistics (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkeinglandandwales/census2021>

<sup>106</sup> Healthy Streets Scorecard (2022) 2022 Scorecard results overview. Available at: <https://www.healthystreetsscorecard.london/results/>

<sup>107</sup> Healthy Streets Scorecard (2022) Tower Hamlets. Available at: [https://www.healthystreetsscorecard.london/your\\_borough/tower-hamlets/](https://www.healthystreetsscorecard.london/your_borough/tower-hamlets/)

<sup>108</sup> Office for National Statistics (2020) Method of travel to work. Available at: [Method used to travel to work - Office for National Statistics \(ons.gov.uk\)](#)

method of travel to work in the borough to the national average indicates considerably lower proportions of people using train, underground, metro, light rail, or tram to travel to work, at 3.9% (-57%). The most popular method of travel to work in England is by driving a car or van, at 44.5%.

Although there are many dedicated cycle routes and pedestrian walkways in the borough, only 10.7% use bicycles or travel on foot to work (as of 2020), and only 11% of residents cycle at least once a week<sup>98</sup>. Despite this, residents in the borough cycling each day takes up to 2,600 cars off the road, and there is ambition amongst the population to increase the use of this mode of transport, with 36% feeling they should cycle more<sup>98</sup>.

### **Future Trends and evolution of the baseline without the NLP**

During the Covid-19 pandemic homeworking has been encouraged for those who are able, leading to a short-term reduction in travel demand and increased financial pressure on the operators. This trend will likely continue as employers look to maintain flexible working conditions in future. In addition, peak periods for traffic congestion are likely to change with less people commuting for work. Public transport will need to adapt to these altered working and lifestyle patterns and encourage more passengers.

As the population in LBTH is becoming younger, and the majority of the population will continue to be of working age, there is likely to be additional demand on the borough's services and transport infrastructure. With public transport infrastructure already under stress with overcrowding and congestion, the transport industry will need to adapt meet the differing needs of this demographic change.

Transport must become accessible and affordable for all that live and work in the borough to reduce inequalities and meet Outcome 6 of the Tower Hamlets Transport Strategy 2019-2041<sup>109</sup>.

The borough has a commitment to become net-zero by 2045 or sooner through the Net Zero Carbon Partnership Action Plan<sup>110</sup>. This will require modal shifts to active transport, to shift the dependency of commuters away from cars and public transport. LBTH Cycling Strategy endeavours to increase the proportion of residents cycling to work to 12 per cent by 2025<sup>111</sup>.

As part of the council's and wider London's commitment to improving air quality the borough is situated within the Ultra Low Emission Zone (ULEZ) that operates 24 hours a day, seven

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<sup>109</sup> Tower Hamlets Council (2019) Tower Hamlets Transport Strategy 2019-2041. Available at: <https://democracy.towerhamlets.gov.uk/ieDecisionDetails.aspx?ID=7286>

<sup>110</sup> Tower Hamlets Council (2021) Net Zero Carbon Partnership Action Plan. Available at: <https://democracy.towerhamlets.gov.uk/ieDecisionDetails.aspx?id=7524>

<sup>111</sup> Tower Hamlets Council (2016) Tower Hamlets – A Cycling Borough. Available at: [https://www.towerhamlets.gov.uk/lgnl/transport\\_and\\_streets/cycling/cycling\\_strategy.aspx](https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/cycling/cycling_strategy.aspx)

days a week, every day of the year (except Christmas Day)<sup>112</sup>, which involves daily penalties for non-compliant vehicles.

To help meet this target, electric and hybrid vehicles are expected to become dominant (with the ban on new petrol and diesel car vehicle sales in the UK by 2035), requiring provisions such as electric charging points to be made for these vehicles across the borough.

Without the NLP transport improvements and developments will likely still come forward in the borough, due to the overarching Transport Strategy<sup>80</sup> and supplementary plans such as the Cycling Plan<sup>82</sup>. However, the NLP will enable the borough to better plan any necessary, large and small-scale improvements to its public transport and active travel networks and put in plan policies that support new developments and increasing demand.

### Issues and Opportunities

Issues and opportunities for transport and accessibility and the implications for the NLP have been identified in **Table D-7**.

**Table D-7 – Issues and Opportunities for Transport and Accessibility**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ There is a need to improve sustainable transport modes (public and active) in line with LBTH’s commitment to reach net-zero GHG emissions by 2045;</li> <li>■ Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs;</li> <li>■ Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender;</li> </ul>	<ul style="list-style-type: none"> <li>■ There is a need to support the reduction of GHG emissions within the transport industry towards net-zero through the better provision of sustainable transport;</li> <li>■ Site selection should account for future climate change, and consider locating transport infrastructure away from areas of high flood risk, or where road drainage may impact on water quality issues;</li> <li>■ The NLP should maximise opportunities to integrate connected blue and green infrastructure along transport corridors;</li> </ul>

<sup>112</sup> Transport for London, Ultra Low Emission Zone. Available at: <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone>

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ Changing work habits such as remote, internet-based jobs and working from home are likely to reduce transport demand; and</li> <li>■ Health inequalities are prevalent in the borough, therefore reducing significant issues with traffic and congestion and subsequent air pollution is of utmost importance.</li> </ul>	<ul style="list-style-type: none"> <li>■ Improving availability, connectivity, reliability and affordability of public transport; and</li> <li>■ There is a need to support greater access to services and facilities for the changing demographics.</li> </ul>

## Biodiversity and Natural Capital

### Summary of Current Baseline

LBTH is a predominantly urban area and contains no internationally or European designated sites. There are numerous nationally designated sites within the greater London area, notably Site of Special Scientific Interest (SSSI), designated under the Wildlife and Countryside Act (1981)<sup>113</sup>, as amended. Gilbert's Pit (Charlton) SSSI in Greenwich is in closest proximity to LBTH, a geological SSSI covering 5.2Ha.

There are also the following European protected sites within 10km of the borough boundary:

- Special Protection Area (SPA): Lee Valley
- Ramsar Sites: Lee Valley
- Special Area of Conservation (SAC): Epping Forest

Lee Valley SPA is designated for Bittern (*Botaurus stellaris*), Gadwall (*Anas strepera*), and Shoveler (*Anas clypeata*). Lee Valley Ramsar Site is also designated for Gadwall and Shoveler, along with Water boatman (*Micronecta minutissima*) and Whorled water-milfoil (*Myriophyllum verticillatum*). All three bird species are list as amber on the Birds of Conservation Concern 5 (BoCC5)<sup>114</sup>, with Bittern showing a decreasing population trend on the IUCN Red List<sup>115</sup>.

<sup>113</sup> Wildlife and Countryside Act 1981. Available at: <https://www.legislation.gov.uk/ukpga/1981/69/contents>

<sup>114</sup> Stanbury, A. J. et al. (2021) The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. Available at: <https://www.bto.org/our-science/publications/birds-conservation-concern/status-our-bird-populations-fifth-birds>

<sup>115</sup> IUCN Red List, The IUCN Red List of Threatened Species. Available at: <https://www.iucnredlist.org/en>

Epping Forest SAC supports Northern Atlantic wet heaths, European dry heaths, Atlantic acidophilous beech forests, and Stag beetle (*Lucanus cervus*) as qualifying habitats and species. All European designations within 10km of the borough boundary are legally underpinned by their respective SSSIs.

LBTH has an abundance of parks and open spaces which provide important habitat for wildlife, many of which are designated as Local Nature Reserves (LNRs). These include Tower Hamlets Cemetery Park, Ackroyd Drive, and Mudchute Park Farm, and cumulatively comprise an area of 25.78Ha.

The borough also has Sites of Importance for Nature Conservation (SINCs) which are London's equivalent of Local Wildlife Sites (LWSs) and are non-statutory designations. SINCs are identified in a four-tier system: Sites of Metropolitan Importance, Sites of Borough Importance (Grades 1 and 2) and Sites of Local Importance. There are 35 SINCs in LBTH<sup>116</sup>, benefitting from a high level of protection within the planning system, including:

- Six Sites of Metropolitan Importance;
- Four Sites of Borough Importance (Grade 1);
- 12 Sites of Borough Importance (Grade 2); and
- 13 Sites of Local Importance.

The habitat of LBTH is predominantly urban, however, there are a range of habitats in parks, cemeteries, waterways, brownfield sites, and gardens. There are also discrete sections of Priority Deciduous Woodland scattered across the borough. Epping Forest SAC woodland site is one of the best examples of Atlantic acidophilous beech forest in its UK range, and Lee Valley SPA / Ramsar wetland site is composed of a series of reservoirs and reedbed habitat.

The loss, fragmentation, and deterioration of natural habitats in the UK has caused a decline in the provision of many ecosystem services, with 41% of all UK species having declined since the 1970s<sup>117</sup>. Habitat loss has been prevalent for open mosaic habitats resulting from derelict sites being redeveloped, and the reason for the decline of species such as the House Sparrow (*Passer domesticus*) in the borough as well as London is largely unknown but could be attributed to habitat loss, pollution, predation and possibly disease<sup>118</sup>.

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<sup>116</sup> [Sites of importance for nature conservation \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

<sup>117</sup> NBN (2019) State of Nature Report. Available at: <https://nbn.org.uk/stateofnature2019/reports/>

<sup>118</sup> Tower Hamlets Council (2019) Tower Hamlets Local Biodiversity Action Plan 2019-2024. Available at: <https://www.towerhabitats.org/wp-content/uploads/2020/09/TowerHamletsLocalBiodiversityActionPlan2019-24.pdf>

According to the Natural Environment Valuation Online (NEVO) tool species richness data<sup>119</sup>, LBTH has 32 species present in the current decade, out of 100 priority species chosen by the Joint Nature Conservation Committee (JNCC). These are broken down as follows:

- Plants – 14 out of 38 species;
- Invertebrates – 8 out of 25 species;
- Birds – 6 out of 17 species;
- Mammals – 4 out of 14 species;
- Lichen – 0 out 5 species; and
- Herptiles – 0 out of 1 species.

The NEVO tool also indicates that out of the 2,000ha comprising the borough, 80% of the land cover is urban, with only 0.9% consisting of semi-natural grassland or woodland.

Natural capital is a key theme in the Government's 25-year Environment Plan: A Green Future<sup>120</sup>. The UK's natural capital accounts show that approximately 20-25 million tonnes of carbon have been sequestered by vegetation in the UK each year between 2007 and 2015, while around 1.5 million tonnes of air pollutants have been removed each year. This equates to a monetary value of approximately £1.5 billion for carbon sequestration and £1 billion for pollution removal in 2015. By comparison, according to the NEVO tool, LBTH sequestered just 17 tonnes of CO<sub>2</sub> a year, equating to a monetary value of £113. Natural capital can play a significant part in mitigating the effects of emissions and climate change.

The important role of natural capital is also prevalent for London, with London's public green spaces having a gross asset value of more than £91 billion, providing services valued at £5 billion per year<sup>121</sup>. The total value of publicly accessible greenspace in LBTH is £2.0 billion, with associated benefits in carbon storage (£0.11 million) and temperature regulation (£20 million)<sup>122</sup>.

Green Infrastructure (GI) provides a strategically planned network of nature and semi-natural areas, designed, and managed to deliver ecosystem services, and provides a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. GI in LBTH includes parks and playing fields, nature reserves and natural

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<sup>119</sup> University of Exeter, NEVO, [online] available at: <https://www.exeter.ac.uk/research/leep/research/nevo/>

<sup>120</sup> Defra (2018) 25 Year Environment Plan. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>121</sup> Mayor of London (2017) Natural capital accounts for public green space in London: Report prepared for Greater London Authority, National Trust and Heritage Lottery Fund. Available at: [11015viv\\_natural\\_capital\\_account\\_for\\_london\\_v7\\_full\\_vis.pdf](https://www.london.gov.uk/asset-upload/11015viv_natural_capital_account_for_london_v7_full_vis.pdf)

<sup>122</sup> Mayor of London (2017) Natural capital accounts for public green space in London: Local authority summaries. Available at: [11015viv\\_nca\\_by\\_borough.pdf](https://www.london.gov.uk/asset-upload/11015viv_nca_by_borough.pdf) (london.gov.uk)

habitats, and allotments and urban greening. However, due to the urban density of the borough there is a sense of open space deficiency.

In addition to GI, the borough has a substantial amount of blue infrastructure (BI) which can provide important habitats and ecosystem services. Key areas include Millwall Outer Dock, South Dock, Blackwell Basin, Poplar Dock Marina, North Dock, Limehouse Basin and the River Lea. Combining blue and green Infrastructure (BGI) elements together is an effective way of providing a sustainable natural solution to urban and climatic challenges.

Urban greening is measured using the Urban Greening Factor (UGF) tool which evaluates both quality and quantity of proposed urban greening. This system will enable LBTH to comply with Policy G5 Urban Greening of the London Plan **Error! Bookmark not defined.**, making the urban greening required for a development measurable.

The Tower Hamlets Green Grid Strategy<sup>123</sup> aims to create a framework for the design and delivery of appealing walking routes and associated GI across the borough. This strategy is essential to reduce the sense of open space deficiency, with the borough having less than the local open space standard of 1.2 hectares per 1,000 residents<sup>124</sup>. Design considerations for interventions which respect the local character and are designed to be low maintenance will enable the benefits of GI to be maximised in the future. The purpose of the Parks and Open Space Strategy 2017-2027<sup>125</sup> is:

- Managing the impact of population growth on the provision of open spaces;
- Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets;
- Contributing to sustainable development;
- Addressing competing demands on parks and open spaces; and
- Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets.

### **Future Trends and evolution of the baseline without the NLP**

The 2019 State of Nature Report<sup>117</sup> highlights the general decrease in biodiversity in the UK. Since 1970, species abundance has decreased by 13% and species distribution has decreased by 5%. Of the 8,431 species that have been assessed using the International

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<sup>123</sup> Land Use Consultants (2017) Tower Hamlets Green Grid Strategy: Update 2017. Available at: [Tower Hamlets Green Grid Strategy: Update](#)

<sup>124</sup> LUC (2016) Tower Hamlets Open Space Audit

<sup>125</sup> Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027. Available at: [170904\\_CAB\\_submission \(towerhamlets.gov.uk\)](#)

Union for Conservation of Nature (IUCN) Regional Red List criteria, 15% are currently threatened with extinction from Great Britain and 2% are already extinct.

Rising population and urbanisation of natural areas can further exacerbate habitat fragmentation and decreases in biodiversity. Species distribution may shrink in LBTH if developments continue to separate habitat corridors connecting the LNRs, specifically Tower Hamlets Cemetery Park and Ackroyd Drive. There are a number of areas which are considered to be deficient in nature, a trend that could continue to rise. This highlights the need for green spaces.

Climate change presents another threat to ecosystem services and biodiversity. Current IPCC<sup>126</sup> predictions for temperature increases are expected to be 2°C by the middle of the 21st century. This increase in temperature is expected to lead to increases in flooding events and northward colonisation of species in the UK. Increased flooding will need to be mitigated, especially as large parts of LBTH are situated within a flood risk zone 3. In order to preserve biodiversity and natural habitats, soft engineering and nature-based solutions will need to be used over traditional hard engineering.

The Environment Act<sup>127</sup> specifies a mandatory 10% increase in biodiversity net gain (BNG) for new developments. This will apply from January 2023 for developments<sup>128</sup> that fall under the Town and Country Planning Act 1990<sup>129</sup>. Biodiversity on development sites will need to be preserved, with additional mitigation put in to increase biodiversity. This increase in biodiversity may be provided on site enhancement, or through off-site compensation.

As part of the LBTHs Net Zero Carbon Plan<sup>130</sup> in response to declaring a climate emergency, the following ambitions relevant to biodiversity and natural capital were identified:

- 2025: Average UGF of 0.3
- 2035: Average UGF of 0.4
- 2050: Average UGF of 0.4

The council has identified that it is not possible to plant enough trees to meaningfully offset total emissions, so as many trees as possible should be planted<sup>131</sup>. Trees that are planted

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<sup>126</sup> IPCC (2022) Climate Change 2022: Impacts, Adaptation and Vulnerability. Available at: <https://www.ipcc.ch/report/ar6/wg2/>

<sup>127</sup> Environment Act (2021). Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>128</sup> Unless exempt. The law will apply to small developments from April 2024.

<sup>129</sup> Town and Country Planning Act 1990 ([legislation.gov.uk](https://www.legislation.gov.uk))

<sup>130</sup> Tower Hamlets Council (2020) Net Zero Carbon Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=165906>

<sup>131</sup> London Borough of Tower Hamlets, Net Zero Carbon Plan, 2020, [online] available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=165906>

must be diverse and native species. LBTH would need further reductions in emissions from forestry in other local authorities, potentially through a future national trading scheme.

London is implementing a Rewild London Fund 2022<sup>132</sup>, providing £850,000 of funding to create new habitats in line with London Environment Strategy<sup>133</sup> targets, with local authorities eligible to apply for funding to support projects.

The Tower Hamlets Local Biodiversity Action Plan (LBAP)<sup>118</sup> sets out a series of actions for the built environment, gardens and grounds, rivers and standing water, and parks, squares and burial grounds. The LBAP identifies priority habitats and species in the borough, and sets objectives and, where appropriate, targets for what needs to be done to ensure their conservation and inform the implementation of future projects and actions.

It is clear that there are a number of ongoing initiatives and plans within the borough that will help to conserve and enhance biodiversity and natural capital and which would be expected to continue without the NLP. However, there is potential that without the NLP some sites and habitats could be threaten by development in inappropriate locations. The NLP may also provide opportunities to increase biodiversity and natural capital assets.

### Issues and Opportunities

Issues and opportunities for biodiversity and natural capital and the implications for the NLP have been identified in **Table D-8**.

**Table D-8 – Issues and Opportunities for Biodiversity and Natural Capital**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas, notably the European designations;</li> <li>■ Increasing population and developments may result in worsening air quality that may degrade the borough’s valuable ecological receptors;</li> <li>■ Development adjacent to watercourses are expected to contribute to achieving Water</li> </ul>	<ul style="list-style-type: none"> <li>■ Developments will need particular attention to potential environmental impacts.</li> <li>■ Development and site allocation of the new NLP will need to include stringent standards for the protection and enhancement of biodiversity and natural capital.</li> <li>■ The NLP should look to develop new green spaces to support the</li> </ul>

<sup>132</sup> London.gov.uk (2022) Rewild London Fund 2022. Available at: <https://www.london.gov.uk/publications/rewild-london-fund-2022>

<sup>133</sup> Mayor of London (2018) Greater London Authority, London Environment Strategy. Available at: [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

Key Risks/Opportunities	Implications for the NLP
<p>Framework Directive objectives relating to ecological status; this includes connectivity for fish and removal of invasive species;</p> <ul style="list-style-type: none"> <li>■ New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity, including consideration of watercourses from the start of the design process in order to maintain the increase in biodiversity over the statutory 30 year period. Developments that seek to create habitat to support species identified as declining should be prioritised; and</li> <li>■ The inclusion of BGI can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island (UHI) effects and help to make developments more climate resilient, especially when it comes to flood mitigation.</li> </ul>	<p>borough's growing population and reduce open space deficiency.</p> <ul style="list-style-type: none"> <li>■ The NLP should prioritise the connection of green spaces in the borough by implementing green corridors to improve GI.</li> <li>■ The NLP will need to encourage development opportunities to remove in-channel structures when present within the watercourse, the use of hard engineering should require strong justification;</li> <li>■ The NLP will need to address plans for flood mitigation. Creation and use of nature-based solutions and ecosystems services for flooding can be included.</li> <li>■ The NLP should establish guidelines for biodiversity net gain to support developers</li> </ul>

## Landscape and Townscape

### Summary of Current Baseline

Landscape and townscape is the visual aesthetic of the natural or built environment. The landscape takes its character from a combination of elements, including topography, watercourses, land use and pattern, vegetation, open space, and cultural heritage features. The topography of the borough is generally flat along the river front to the south, with some sections of the Isle of Dogs at sea level or below (< 0m)<sup>134</sup>. The elevation of the land increases towards the northwest and at discrete locations such as Canary Wharf (up to 39m). The average elevation in the borough is 9m.

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<sup>134</sup> [London Borough of Tower Hamlets topographic map, elevation, terrain \(topographic-map.com\)](https://www.topographic-map.com/)

LBTH is predominantly urban; however, there are over 200 parks and greenspaces within the borough, and 170 are publicly accessible, most notably Victoria Park and Mile End Park. Victoria Park is the borough’s largest park, covering over 80Ha<sup>135</sup>.

Metropolitan Open Land (MOL) is strategic open land within the urban area, afforded the same level of protection as the Green Belt. Despite there being no designated Green Belt land within the borough, 7.6% of LBTH is MOL<sup>136</sup>. These designations restrict development to heavily developed areas in LBTH.

LBTH falls within two of Natural England's National Character Areas (NCAs)<sup>137</sup>. These are defined in **Table D-9** below.

**Table D-9 – National Character Areas within Tower Hamlets**

NCA	Description
81: Greater Thames Estuary	<ul style="list-style-type: none"> <li>Predominantly a remote and tranquil landscape of shallow creeks, drowned estuaries, low-lying islands, mudflats and broad tracts of tidal salt marsh and reclaimed grazing marsh that lies between the North Sea</li> </ul>

<sup>135</sup> [BoroughProfileEnvironment.pptx \(live.com\)](#)

<sup>136</sup> RCKa. Small Sites in London: London Borough of Tower Hamlets. Available at: [RCKa Small Sites: London Borough of Tower Hamlets – RCKa: Small Sites](#)

<sup>137</sup> Natural England (2014) Corporate report: National Character Area profiles. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

NCA	Description
	<p>and the rising ground inland.</p> <ul style="list-style-type: none"> <li>• It forms the eastern edge of the London Basin and encompasses the coastlines of South Essex and North Kent, along with a narrow strip of land following the path of the Thames into East London.</li> <li>• There are busy urban and industrial areas towards London where population density is high and development pressures are increasing. Historic military landmarks are characteristic features of the coastal landscape.</li> </ul>

NCA	Description
112: Inner London	<ul style="list-style-type: none"> <li>• Predominantly urban and lies at the centre of the Thames Basin on a broad flood plain which rises in gentle terraces, providing panoramic views of London’s skyline from the clay plateaux and ridges in the north at the border with the Northern Thames Basin.</li> <li>• The NCA is steeped in both historical and contemporary culture; it is the centre of UK Government and a major international hub for finance, business, tourism, transport and</li> </ul>

NCA	Description
	<p>recreation. Owing to its urban nature, Inner London relies heavily on ecosystem services provided by the surrounding NCAs, such as flood alleviation, air temperature regulation and recreational services. For example, the Thames Barrier in the Greater Thames Estuary is a major tidal flood defence for London. However, the extensive network of green infrastructure throughout the NCA provides outdoor recreation and wildlife habitat close to people's</p>

NCA	Description
	<p>homes and places of work.</p> <ul style="list-style-type: none"> <li>Reservoirs and wetlands such as the Lea Valley in the east provide opportunities for birding and fishing, as well as walking, cycling and boating. water-based activities are provided along the Thames and its tributary rivers. Parks and green spaces scattered among the built environment provide highly valued pockets of perceived tranquillity.</li> <li>Nevertheless, many communities in London</li> </ul>

NCA	Description
	<p>suffer a shortage of green space close to where they live. The Thames Path National Trail also provides extensive walking opportunities following the river together with strategic walking routes such as the Capital Ring and the Jubilee Walkway.</p>

The Green Flag Award® is a non-profit international accreditation programme that recognises and rewards well managed parks and green spaces<sup>138</sup>, and 13 of the borough’s parks benefit from such award. The London in Bloom campaign have also provided nine gold awards to the borough, with the borough awarded the ‘City’ category for 2022<sup>139</sup>.

Townscape includes the buildings and the activities and spaces between them, with the public realm an important feature of the townscape. Views are considered as intrinsic to local character, and London Boroughs are required to designate local views and landmarks. The London View Management Framework SPG<sup>140</sup> identifies the silhouette of Canary Wharf as a recognisable feature in numerous panoramic views of London and is designated as a “Skyline of Strategic Importance”. There are a total of 39 landmarks and 92

<sup>138</sup> Green Flag Award (2023) Available at: <https://www.greenflagaward.org/#>

<sup>139</sup> London In Bloom (2023) <https://londoninbloom.co.uk/>

<sup>140</sup> Mayor of London (2012) London View Management Framework. Available at: [London View Management Framework | London City Hall](#)

views identified in conservation area appraisals and management guidelines for the borough<sup>141</sup>.

LBTH includes some of London's destination high streets including Columbia Road Flower Market, Brick Lane's curry houses, Bethnal Green's craft beer pubs and night life, Whitechapel's growing transport and civic hub and the rich East End history linked to Chrisp Street and Roman Road<sup>142</sup>. Town centres are the economic, transport, social and civic hearts of the borough, with the borough having eight district centres:

- Bethnal Green
- Brick Lane
- Chrisp Street
- Middlesex Street
- Roman Road East
- Roman Road West
- Watney Market
- Whitechapel
  - The borough has number of major tourist attractions which include:
    - The Museum of London Docklands;
    - The Tower of London;
    - Tower Bridge;
    - Canary Wharf;
    - Victoria Park; and
    - Whitechapel Gallery.

### **Future Trends and evolution of the baseline without the NLP**

Landscape and townscape character and quality is under particular threat from future development through, for example, loss of tranquillity, increased lighting, visual intrusion and the incremental loss of landscape features and characteristic elements.

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<sup>141</sup> Tower Hamlets Council (2018) Local Plan Topic Paper D.DH4 Managing and Shaping Views. Available at: [Topic Paper Views and Landmarks 2018.pdf \(towerhamlets.gov.uk\)](#)

<sup>142</sup> Tower Hamlets Council. Tower Hamlets High Streets & Town Centres Strategy 2017 – 2022. Available at: [6.6a%20-%20App1%20-%20High%20Streets%20Town%20Centre%20Strategy%202017-2022.pdf \(towerhamlets.gov.uk\)](#)

Similarly, pressures from expanding populations put more strain on existing systems, and more pressure on recreational landscapes and tourist attractions.

Growth will also increase the demand for open spaces, and place challenges on LBTH to meet this demand, especially when faced with the current financial pressures experienced nationwide. Despite this, residents will need access to high quality open space, increasing the provisions required.

The Parks and Open Space Strategy 2017-2027 acknowledges the need to attract investment for the borough’s increasing demand for open space<sup>143</sup>.

Without a NLP there may be reduced opportunities for new development to enhance and support the local landscape and townscape character through, quality design, provision of green infrastructure and/or habitat creation.

### Issues and Opportunities

Issues and opportunities for landscape and townscape and the implications for the NLP have been identified in **Table D-10**.

**Table D-10 – Issues and Opportunities for Landscape and Townscape**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place;</li> <li>■ Future growth could risk compromising landscape and townscape character and features. However, design that incorporates public realm and GI principles could play a key role in the enhancement of the natural environment, visual amenity and physical and mental health of the borough’s people;</li> <li>■ There is opportunity to increase greenspace access and subsequently, to improve health and wellbeing, combat air pollution, provide</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP must consider the setting of landscape and townscape assets and tourist destinations, ensuring development enhance setting.</li> <li>■ The NLP must consider the importance of landscape and townscape character when outlining options, ensuring development does not erode the quality and key characteristics of the landscape and townscape, and instead respects it.</li> <li>■ The NLP must protect the views that comprise the urban skyline, including the visibility of important</li> </ul>

<sup>143</sup> Tower Hamlets Council (2017) Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027. Available at: [https://www.towerhamlets.gov.uk/ignl/leisure\\_and\\_culture/parks\\_and\\_open\\_spaces/open\\_space\\_strategy.aspx](https://www.towerhamlets.gov.uk/ignl/leisure_and_culture/parks_and_open_spaces/open_space_strategy.aspx)

Key Risks/Opportunities	Implications for the NLP
<p>storm water management and reduce flooding (contributing to climate change adaptation and mitigation) and provide connectivity through urban built form to the countryside for wildlife. It can also bring new audiences to tourist attractions and enable better appreciation of historic landscape assets through creating new views and vistas, providing information and enhancing access</p>	<p>landmarks, to comply with requirements for tall buildings and respect the unique visual amenity of the borough’s setting.</p> <ul style="list-style-type: none"> <li>■ To NLP must develop better contextual townscape design to enable new developments of greater density than existing to integrate and reflect the borough’s special character.</li> <li>■ The NLP may seek to enhance the setting of its landscape and townscape assets and increase urban greening.</li> <li>■ The NLP may consider encouraging the public use of green spaces and encourage preservation of assets.</li> </ul>

## Historic Environment

### Summary of Current Baseline

LBTH possesses a great diversity of heritage assets of international to local importance and priority. The borough takes its name from the historical association with the Tower of London and the surrounding hamlets, characterised by a long history of maritime and trade activity, and migration and change. LBTH has a comprehensive strategy for regeneration and enhancement of such heritage assets<sup>144</sup>.

Heritage assets make a significant contribution to the quality of life for those living, working or visiting LBTH. There are a number of designated assets throughout LBTH<sup>145</sup>, including:

- Two World Heritage Sites;
- Nine Scheduled Monuments;

<sup>144</sup> Tower Hamlets Council (2017) Conservation Strategy 2017-2027. Available at: [https://www.towerhamlets.gov.uk/lgnl/planning and building control/conservation and urban design/conservation and urban design.aspx](https://www.towerhamlets.gov.uk/lgnl/planning%20and%20building%20control/conservation%20and%20urban%20design/conservation%20and%20urban%20design.aspx)

<sup>145</sup> Historic England - Search the list. Available at: <https://historicengland.org.uk/>

- 13 Grade I Listed Buildings;
- 40 Grade II\* Listed Buildings;
- 2,000 Grade II Listed Buildings<sup>146</sup>;
- 210 Locally Listed Buildings;
- 58 Conservation Areas; and
- Five Registered Parks and Gardens.

The Tower Hamlets Local List identifies locally important heritage assets that are valued by the local community, these are also referred to as non-designated heritage assets (visible, buried or submerged). Although not designated, these assets are material planning considerations and the NPPF and draft policies contain references to them. There are currently 210 locally listed buildings and 44 locally listed war memorials within the borough.

The Greater London Historic Environment Record (GLHER)<sup>147</sup> is a comprehensive and dynamic resource for the historic environment of Greater London, with data supporting the work of the Greater London Archaeological Advisory Service (GLAAS). The record contains over 87,000 entries, with 1,122 of these in LBTH.

The two designated World Heritage Sites were designated by UNESCO for their 'Outstanding Universal Value', which have been inscribed on the World Heritage List by the World Heritage Committee. World Heritage Status is a high accolade that brings international scrutiny. The designated World Heritage Site's situated partially or wholly within the borough, and occupying buffer zones, are:

- Tower of London World Heritage Site, The Tower of London (inscribed 1988)
- Maritime Greenwich World Heritage Site, Island Gardens (inscribed 1997)

Historic England's Heritage at Risk (HAR)<sup>148</sup> programme helps to understand the overall state of England's heritage sites. It identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. In LBTH, there are 36 assets on the HAR register; one Scheduled Monument, five Conservation Areas, 24 Grade II listed buildings, four Grade II\* listed buildings, and two Grade I listed buildings.

Historic England provides specific guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes, set against the background of the National Planning Policy Framework (NPPF)

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<sup>146</sup> Grade I Listed Buildings are of exceptional interest. Grade II\* Listed Buildings are particularly important buildings of more than special interest. Grade II buildings are of special interest.

<sup>147</sup> Greater London Historic Environment Record (GLHER) Available at: <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-historic-environment-record/#Online>

<sup>148</sup> Heritage at Risk (2022) Available at: <https://experience.arcgis.com/experience/cb50293b60cd42e98f7d312cec9115a9/>

and the related guidance given in the Planning Practise Guide (PPG). In addition to the visual setting, 'setting' can also include intangible such as sound, smells, and historic associations / relationship

An Archaeological Priority Area (APA) is a defined area where, according to existing information, there is significant known archaeological interest or potential for new discoveries<sup>149</sup>. All parts of the borough fall into one of four different tiers of archaeological significance and potential (Tier 1-3 constituting an APA, and Tier 4 outside an APA). There are a total of 31 APAs in the borough, of which six are Tier 1 APA, 23 are Tier 2 APAs and two are Tier 3 APAs, cumulatively covering approximately 74% of the borough<sup>150</sup>.

### **Future Trends and evolution of the baseline without the NLP**

Protection of the historic environment is firmly embedded in national and local policy, and this has been the case since 1990. This policy has developed independently of the European Union and is unlikely to change with the Retained EU Law Bill. However, whilst harm to the significance of heritage assets is largely restricted, harm to the setting of heritage assets still occurs; for example, relating to visual intrusion, or aspects such as traffic, lighting, and noise. This can be a sensitive planning issue.

One trend over the last few years which may well continue, is the reduction in funding for Historic England and county and local authorities, with increased pressure on the case workload of Archaeological Officers, Conservation Officers, and Historic England advisors. This can have an impact on the response times for the provision of planning advice.

The reduction in funding for Historic England also has an impact on the number of and the scale of grants for the Historic Environment, this includes to grants to heritage assets at risk. Therefore, these heritage assets likely to see a decline in their preservation, and an increase in heritage at risk that is lost.

The number of vehicles on the roads is likely to increase as the borough's population rises, increasing air pollution and road traffic. This has the potential to harm the settings of World Heritage Sites, listed buildings, scheduled monuments and parks and gardens, as well as conservation areas.

Expansion of roads and the development of new residential and commercial areas, to accommodate the increased number of private vehicles, road traffic, and population increase, will put pressure on land space and could result in land take from heritage assets. Depending on the scale and nature of land take, as this may harm both the setting and characteristics of assets.

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<sup>149</sup> [Greater London Archaeological Priority Areas | Historic England](#)

<sup>150</sup> Historic England (2017) London Borough of Tower Hamlets: Archaeological Priority Areas Appraisal. Available at: <https://historicengland.org.uk/content/docs/planning/apa-tower-hamlets-pdf/>

Climate change also poses a risk of harm to heritage assets, their characteristics, and settings, particularly through increased flooding, extreme heat events, and changes to energy requirements. Historic England have outlined guidance to achieving net zero targets and adapting the heritage environment to climate change – this is focussed on reusing UK homes built before 1919 (approximately 20% of the UK’s housing resource) and adapting their energy needs<sup>151</sup>.

Protection of the historic environment is likely to be maintain through existing local, regional and national plans and policies, however without the NLP there may be reduced opportunities for new development to enhance and support the local heritage character and strike the right balance between protection and enhancement the need for development.

### Issues and Opportunities

Issues and opportunities for the historic environment and the implications for the NLP have been identified in **Table D-11**.

**Table D-11 – Issues and Opportunities for Historic Environment**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active modes and asset settings;</li> <li>■ Trans-boundary matters should be noted and the impact that development in LBTH may have on heritage in other boroughs;</li> <li>■ There is potential for development to encroach on assets and their settings, particularly through land take, increased noise and visual effects. Although damage to the significance and setting of assets from development is not limited to these factors; Archaeological remains, whether designated or not, can require preservation in situ. This clearly has implications and can represent a</li> </ul>	<ul style="list-style-type: none"> <li>■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active forms of transport.</li> <li>■ The NLP should preserve and enhance the current settings of heritage assets, both designated and non-designated.</li> <li>■ The NLP must consider the importance of local historic character when outlining options, ensuring that development doesn't erode the quality and key characteristics of assets.</li> </ul>

<sup>151</sup> Historic England, 2022. Climate Change: Mitigation, Adaptation and Energy Measures. [online] Available at: <https://historicengland.org.uk/whats-new/features/climate-change/>

Key Risks/Opportunities	Implications for the NLP
<p>significant constraint to future scheme design, which should respect, retain and protect the remains (e.g. through avoidance and redesign); and</p> <ul style="list-style-type: none"> <li>Vehicle damage and pollution can adversely affect World Heritage Site's, listed buildings and scheduled monuments, so reducing vehicle movements within historic areas is also important to address.</li> </ul>	<ul style="list-style-type: none"> <li>The NLP should include measures to minimise climate change impacts on the historic environment.</li> <li>The NLP should ensure that development adjacent, or in close proximity to the local conservation areas, designated assets, archaeological remains or listed buildings, respects their character and setting, and does not detract from the quality of the built environment.</li> </ul>

## Water Environment

### Summary of Current Baseline

The borough falls within the Thames River Basin District, and the London Management Catchment. The Lee Lower Rivers and Lakes Operational Catchment feeds into the Lee (Tottenham Locks to Bow Locks/Three Mills Locks) Water Body. This is a heavily modified water body and has a catchment area of 45.185 km<sup>152</sup>, with the River Lee Navigation draining into Limehouse Basin.

The Water Framework Directive (WFD)<sup>153</sup> sets an objective of aiming to achieve at least 'good' status for all waterbodies by a set deadline specific for each waterbody. Most of the monitored waterbodies are 'main rivers' that are under the jurisdiction of the Environment Agency. **Table D-12** below show the water quality (ecological and chemical) of the 27 waterbodies in the Lee Lower Rivers and Lakes Operational Catchment for the 2019 Cycle 3.

### Table D-12 – Water quality (ecological and chemical status) of the Lee Lower Rivers and Lakes Operational Catchment<sup>152</sup>

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<sup>152</sup> Environment Agency. Catchment Data Explorer - Thames River Basin District. Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6>

<sup>153</sup> Department for Environment, Food & Rural Affairs (2014) Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307788/river-basin-planning-standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf)

Operational Catchment	Classification							
	Ecological Status					Chemical Status		
	Total Water Bodies	High	Good	Moderate	Poor	Bad	Fail	Good
Lee Lower Rivers and Lakes	27	0	1	16	9	1	27	0

Of the 27 water bodies, just one has ‘good’ ecological status, falling far short of the WFD target of 100%. The percentage of waterbodies achieving ‘moderate’ status was 59.3%, whilst 37.0% were ‘poor’ or ‘bad’ status. All water bodies failed based on their chemical status.

The Lee (Tottenham Locks to Bow Locks/Three Mills Locks) Water Body is the only water body in the operational catchment achieving ‘bad’ ecological status. It is also ‘high’ for all specific pollutants, including Arsenic (As) and Copper (Cu).

The reasons for not achieving good (RNAG) is predominantly due to urban development associated with urban and transport, sewage discharge by the water industry, use of restricted substance by navigation, and misconnections by the domestic general public.

The WFD also includes groundwater water bodies, with the objective of achieving ‘good’ quantitative and chemical status. The borough contains one such groundwater body, Greenwich Tertiaries and Chalk, which currently has ‘poor’ chemical and quantitative classification.



activity; water shortages; and higher incidence of damage to transportation, utilities, property and communications infrastructure caused by an increase in the number of extreme weather events (e.g., heat, high winds, and flooding). It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within the borough.

A NLP presents opportunities to provide a targeted approach to addressing flood risk and water quality issues. It could support sustainable urban drainage systems (SUDs) and GI requirements within new developments in order to adapt to climate change and counteract flood risk.

### Issues and Opportunities

Issues and opportunities for the water environment and the implications for the NLP have been identified in **Table D-13**.

**Table D-13 – Issues and Opportunities for the Water Environment**

Key Risks/Opportunities	Implications for the NLP
<p>Water quality</p> <ul style="list-style-type: none"> <li>■ The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat;</li> <li>■ Of the 27 waterbodies in the borough, just 3.7% are achieving ‘good’ status, falling far short of the WFD target; and</li> <li>■ Upgrading existing infrastructure provides the opportunity to improve pollution control.</li> </ul> <p>Flood risk</p> <ul style="list-style-type: none"> <li>■ Increased development near a watercourse (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale;</li> <li>■ Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the</li> </ul>	<p><b>Water quality</b></p> <ul style="list-style-type: none"> <li>■ The NLP should promote that development in close proximity to a watercourse should include the addition of naturalised features to buffer zones to connect the river to the riparian zone, create natural flood management (NFM) schemes, and promote biodiversity.</li> <li>■ The NLP should seek to protect groundwater quality as a water resource.</li> </ul> <p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>■ The NLP should undertake a new Strategic Flood Risk Assessment (SFRA) and Flood Risk Management Strategy to address new challenges and mitigate against risk of flooding in the borough. These can also provide an evidence base to support the NLP.</li> </ul>

Key Risks/Opportunities	Implications for the NLP
<p>already stressed capacity of sewer systems; and</p> <ul style="list-style-type: none"> <li>■ Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in LBTH, in addition to existing residual flood risk in the event of a breach or failure of the flood defences.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP should ensure that development in close proximity to a watercourse should include provision of natural, undeveloped buffer zones. These can help contribute to natural flood management (NFM) whilst also allowing access for maintenance and emergency works.</li> <li>■ The NLP should seek to incorporate sustainable urban drainage systems (SUDs) and GI requirements within new developments in order to adapt to climate change and counteract flood risk. GI can also reduce surface water runoff and have water quality co-benefits.</li> <li>■ The NLP should critically assess the resilience of Thames flood defences to sea level rise under different climate scenarios. The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.</li> </ul>

## Air Quality

### Summary of Current Baseline

Air quality plays an important role in human health. Poor air quality can have large impacts on health through short term exposure, but particularly through long term exposure. According to the World Health Organisation (WHO), air quality is one of the greatest environmental risks to human health. Reducing air pollution can result in reductions in stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases,

including asthma<sup>159</sup>. In 2019, 99% of the world's population were living in places where the WHO air quality guidelines were not met, and that ambient air pollution caused 4.2 million premature deaths worldwide in that year. Major pollutants include nitrous oxide (NO<sub>x</sub>), nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM).

Poor air quality also contributes to the deterioration of ecological receptors. Ecosystems are negatively impacted by air pollution, particularly emissions such as sulphur and nitrogen, as it affects their ability to function and grow<sup>160</sup>.

LBTH has higher levels of air pollution compared to the UK overall<sup>161</sup>. The average annual mean for nitrogen dioxide in the majority of the borough is 21 – 30 µg m<sup>-3</sup>. In some parts of the borough the average annual mean is 41 – 50 µg m<sup>-3</sup>, exceeding the UK air quality objective (AQO)<sup>162</sup> of 40 µg m<sup>-3</sup>. The average annual mean for nitrogen oxides are between 31 – 40 µg m<sup>-3</sup> and 41 – 60 µg m<sup>-3</sup>, exceeding the UK AQO of 30 µg m<sup>-3</sup>. The borough does not exceed the AQO for either PM<sub>10</sub> or PM<sub>2.5</sub>.

Local authorities must declare areas that are not likely to achieve national air quality objectives as Air Quality Management Areas (AQMAs). The whole borough sits within the Tower Hamlets AQMA which was designated in 2000 for PM<sub>10</sub> (24-Hour Mean) and NO<sub>2</sub> (Annual Mean)<sup>163</sup>. The source of pollution is transport and industry.

The borough is situated within the London Ultra Low Emission Zone (ULEZ) which operates 24 hours a day, every day of the year, except Christmas Day (25 December). The high levels of pollutants in the borough are of particular concern due to their impacts on human health, especially as in 2019 it was estimated that between 88 and 97 deaths were attributable to human made NO<sub>2</sub> and PM<sub>2.5</sub> air pollution exposure<sup>164</sup>. LBTH's Air Quality Action Plan (AQAP) 2022-2027<sup>165</sup> is being implemented to address ongoing poor air quality throughout the borough.

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<sup>159</sup> WHO (2022) Ambient (outdoor) air pollution. Available at: [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

<sup>160</sup> UNECE. Air Pollution, Ecosystems and Biodiversity, [online] Available at: [Air pollution, ecosystems and biodiversity | UNECE](#)

<sup>161</sup> Defra. UK Air Information Resource. UK Ambient Air Quality Interactive Map. Available at: <https://uk-air.defra.gov.uk/data/gis-mapping/>

<sup>162</sup> Defra. UK Air Information Resource. UK Air Quality Limits. Available at: <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits>

<sup>163</sup> Defra. UK Air Information Resource. AQMA Details. Available at: [https://uk-air.defra.gov.uk/aqma/details?aqma\\_ref=141](https://uk-air.defra.gov.uk/aqma/details?aqma_ref=141)

<sup>164</sup> Imperial College London. London Health Burden of Current Air Pollution and Future Health Benefits of Mayoral Air Quality Policies. Available at: [http://erg.ic.ac.uk/research/home/resources/ERG\\_ImperialCollegeLondon\\_HIA\\_AQ\\_LDN\\_11012021.pdf](http://erg.ic.ac.uk/research/home/resources/ERG_ImperialCollegeLondon_HIA_AQ_LDN_11012021.pdf)

<sup>165</sup> Tower Hamlets Council. London Borough of Tower Hamlets: Air Quality Action Plan 2022 – 2027. Available at: [https://www.towerhamlets.gov.uk/ignl/environment\\_and\\_waste/environmental\\_health/pollution/air\\_quality/Breathe\\_Clean/Air-Quality-Action-Plan.aspx](https://www.towerhamlets.gov.uk/ignl/environment_and_waste/environmental_health/pollution/air_quality/Breathe_Clean/Air-Quality-Action-Plan.aspx)

The Borough Air Quality Compendium report (2022)<sup>166</sup> summarises the Annual Status Reports (ASRs) submitted by the London boroughs in 2021 from monitoring data in 2020. LBTH showed a drop from twenty-one locations exceeding NO<sub>2</sub> concentrations in 2019 to just one location post distance correction in 2020. The borough is also demonstrating improvement with regards to emissions from developments and buildings, adopting Air Quality Neutral policies, checking compliance at planning application stage for every major development proposal, and 100% of schemes in 2020 having suitable energy efficiency measures installed to reduce the demand for onsite heat generation.

### **Future Trends and evolution of the baseline without the NLP**

The UK Clean Air Strategy outlines plans to reduce emission of pollutants and improve air quality by the year 2030<sup>167</sup>. This will include reductions in public exposure to particulate matter, ammonia, nitrogen oxides, sulphur dioxide, and non-methane volatile organic compounds. However, the 29% increase in road traffic from 1990 and 2018 and 6% increase in GHG emission from 1990 to 2017 is likely to continue.

Additionally, as LBTH is part of the London urban area, it is likely that increases in population and urbanisation will contribute to increased air pollution. More severe and frequent heat episodes (associated with the changing climate) can also worsen air quality and therefore asthma, respiratory diseases and allergic reactions, without further intervention.

A ban on new petrol and diesel vehicle sales in the UK by 2030 is expected to further reduce NO<sub>x</sub> emissions. This will improve air quality, particularly across urban areas, and further the improvements to emissions reductions. Electric and hybrid vehicles are expected to become dominant (with the ban on hybrid vehicle sales in the UK by 2035).

The UK wide ban on the new petrol and diesel vehicle sales by 2030 is expected to lead to a reduction in emissions from vehicles<sup>168</sup>. This will improve air quality in urban areas, which will have a positive impact on health problems associated with air pollution. Because the AQMA in the borough is associated with vehicle emissions, the transition to electric vehicles has the potential to bring air pollution to acceptable levels.

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<sup>166</sup> Greater London Authority (2022) Local Authorities and Air Quality: A summary of action taken by London boroughs to improve air quality in 2020. Available at:

[https://www.london.gov.uk/sites/default/files/gla\\_compendium\\_report\\_final\\_jan\\_2022.pdf](https://www.london.gov.uk/sites/default/files/gla_compendium_report_final_jan_2022.pdf)

<sup>167</sup> Defra. (2019). Clean Air Strategy. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

<sup>168</sup> HM Government (2020). Available online at: <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

Overall, increases in population and urbanisation have the possibility to degrade air quality, while higher standards for air pollutants and vehicle emissions have the potential to improve air quality. These opposing trends may balance each other out in future.

Without the NLP development could be located in areas that are not well served by community facilities, services and jobs thereby increasing traffic movements and further impacting upon the borough’s air quality.

### Issues and Opportunities

Issues and opportunities for air quality and the implications for the NLP have been identified in **Table D-14**.

**Table D-14 – Issues and Opportunities for Air Quality**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation;</li> <li>■ More severe and frequent heat episodes as a result of climate change can contribute to the worsening of air quality;</li> <li>■ Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases;</li> <li>■ The UK Government’s plan to end the sale of all new conventional petrol and diesel cars and vans by 2030 and support for work and home-based electric charging facilities, will promote use of hybrid and electric vehicles, with positive effects for air quality; and</li> <li>■ Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP must consider the implications of Government plans, facilitating the transition to electric vehicles.</li> <li>■ Consideration should be given to methods of modal shift to sustainable transport modes (public transport and active transport) active, to aid in reducing emissions.</li> <li>■ The NLP should aim to improve congested areas of LBTH, minimising excess emissions where possible and aiding in improving air quality.</li> <li>■ The NLP could consider living wall systems in the borough for associated air quality, biodiversity, and visual amenity benefits in highly urbanised areas.</li> </ul>

## Climate Change and Greenhouse Gases

### Summary of Current Baseline

In 2021, an estimated 26% of greenhouse gas emissions (GHGs) in the UK were from the transport sector, 20% energy supply, 18% business and 16% residential, with carbon dioxide (CO<sub>2</sub>) being the most prominent gas from these sectors<sup>169</sup>. In 2021, transport accounted for 109.5 MtCO<sub>2</sub>e of GHG emissions, which represents a 10% increase from 2020, but an 11% decrease compared with 2019 figures. The impact of the pandemic in 2020 caused transport emissions to fall, attributable to lockdown measures introduced.

In 2020, a total of 1,020.4 ktCO<sub>2</sub>e emissions<sup>170</sup> were generated by LBTH, with the greatest number of emissions arising from commercial uses (33.9%), followed by transport (25.9%), and domestic uses (20.9%). The percentage change of emissions per km<sup>2</sup> from 2005 to 2019 is -43% for the borough, better than the national average reduction of -36% for the same period. **Table D-15** shows the breakdown of emissions generated by the highest emission sectors in LBTH compared to regional and national averages.

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<sup>169</sup> Defra (2023) 2021 UK Greenhouse Gas Emissions, Final Figures. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1134664/greenhouse-gas-emissions-statistical-release-2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1134664/greenhouse-gas-emissions-statistical-release-2021.pdf)

<sup>170</sup> Department for Business, Energy & Industrial Strategy (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

**Table D-15 – Carbon Emissions**<sup>170</sup>

	<b>Total Emissions (ktCO<sub>2</sub>e)</b>	<b>Commercial Emissions (%)</b>	<b>Transport Emissions (%)</b>	<b>Domestic Emissions (%)</b>
Tower Hamlets	1,081.2	33.9	25.9	20.9
London	28,369.3	36.2	28.5	36.2
England	291,134.6	7.0	30.7	26.3

In 2019, the average per capita emissions across LBTH are 3.6 tonnes of CO<sub>2</sub> emissions per person, which is slightly higher than the regional of 3.2 tonnes per person but significantly lower than the national average of 8.9 tonnes per person<sup>170</sup>.

During the most recent decade (2009-2018) the UK has been on average 0.3°C warmer than the 1981-2010 average and 0.9°C warmer than 1961-1990. All of the top ten warmest years have occurred since 2002. In the past few decades there has been an increase in annual average rainfall over the UK, for which the most recent decade (2009-2018) has been on average 5% wetter than 1961-1990 and 1% wetter than 1981-2010<sup>171</sup>.

LBTH has a relatively high climate risk according to The London Climate Risk Maps<sup>172</sup>, which measures overall risk using 13 metrics, which are as follows:

- Ages Under 5;
- Ages Over 75;
- English Proficiency;
- Income Deprivation;
- Social Renters;
- BAME;
- Average Land Surface Temperature;

<sup>171</sup> Met Office (2022) UK Climate Projections: Headline Findings. Available at: [https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18\\_headline\\_findings\\_v4\\_aug22.pdf](https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v4_aug22.pdf)

<sup>172</sup> Bloomberg Associates (2022) Climate Risk Mapping. Available at: <https://data.london.gov.uk/dataset/climate-risk-mapping>

- Surface Water Flood Risk;
- PM<sub>2.5</sub>;
- NO<sub>2</sub>;
- Green/Blue Land Cover; and
- Areas of Deficiency in Access to Public Open Space.

Areas including Wapping, Shadwell, Bethnal Green, Bow and Poplar have the highest climate risk, traversing west to east of the borough. Limehouse, Blackwall and Isle of Dogs have the lowest climate risk, and subsequently a lower heat risk. Urban heat island (UHI) is the phenomenon where temperatures are relatively higher in cities compared to surrounding rural areas. UHI up to 8°C have been felt in UK cities, whilst cities the size of London has experienced temperatures in the order of 10°C, and concern for excess urban heat are increasing<sup>173</sup>.

### **Future Trends and evolution of the baseline without the NLP**

The UK is committed to legally binding GHG emissions reduction targets of 80% by 2050, compared to 1990 levels, as set out in the Climate Change Act 2008<sup>174</sup>. The UK ratified the 2015 Paris Agreement, which set out a GHG emission reduction target of at least 40% by 2030, compared to 1990 with a long-term strategy for net zero emissions by 2050<sup>175</sup>. However, a more ambitious target was set by the UK in 2020 to reduce greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels<sup>176</sup>. Currently there is widespread criticism as to whether the UK is on track to meet these ambitions.

Working towards these targets means changes to technology as well as ways in which people travel. For example, prior to the 26th Conference of the Parties (COP26) Summit in 2021, the UK brought forward its ban on the selling of new petrol, diesel, or hybrid cars from 2040 to 2030. The last decade has seen a remarkable surge in demand for electric vehicles in the UK.

The number of licensed ultra-low emission vehicles (ULEVs) in the UK has increased by 3,427% between the end of March 2010 to the end of June 2020, a jump from just under 9,000 ULEVs to 317,000 ULEVs<sup>177</sup>.

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<sup>173</sup> Royal Meteorological Society (2017) Urban Heat Islands. Available at: [Urban Heat Islands | Royal Meteorological Society \(rmets.org\)](#)

<sup>174</sup> Climate Change Act 2008, Available online at: <https://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>175</sup> Paris Agreement, Available online at: [https://ec.europa.eu/clima/policies/international/negotiations/paris\\_e](https://ec.europa.eu/clima/policies/international/negotiations/paris_e)

<sup>176</sup> Department for Business, Energy and Industrial Strategy, Press Release: UK Sets Ambitious New Climate Target Ahead of UN Summit, 2020, Available online at: <https://www.gov.uk/government/news/uk-sets-ambitious-newclimate-target-ahead-of-un-summit>

<sup>177</sup> House of Commons (2020) Briefing Paper: Electric Vehicles and Infrastructure. Available at: <https://researchbriefings.files.parliament.uk/documents/CBP-7480/CBP-7480.pdf>

Since the 27<sup>th</sup> Conference of the Parties (COP27) Summit in 2022, the UK has pledged to triple its contributions to adaptation finance by 2025<sup>178</sup>, in recognition of the existential threat climate change is posing globally. The next UN climate summit, COP28, held in November/December 2023, is set to take stock of its progress on the Paris Agreement through the first Global Stocktake (GST)<sup>179</sup>.

The Mayor of LBTH declared a climate emergency in 2019 and set an ambitious target for the council to become net zero by 2025, and the borough net zero by 2045. The London Borough of Tower Hamlets Net Zero Carbon Plan document sets out the strategic vision on how this is going to be achieved<sup>130</sup>. The plan details actions recommended for Power, Buildings, Transport, Waste, Forestry and land use, Industry, Aviation, and F-gases.

By the end of the 21st century, all areas of the UK are projected to be warmer, more so in summer than in winter. This projected temperature rise in the UK is consistent with future warming globally. Rainfall patterns across the UK are not uniform and vary on seasonal and regional scales and will continue to vary in the future, with significant increases in hourly precipitation extremes<sup>4</sup>. Both temperature and rainfall changes will be much larger if greenhouse gas emissions continue to increase.

Despite this, the current estimate for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future, given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

A new NLP would allow for better designed developments and buildings which are more resilient to the effects of climate change, reduce GHGs construction and operation (including embodied carbon). It will likely support developments that would also likely be more accessible, particularly by sustainable transport, which in turn will aid the borough in reducing the amount of greenhouse gases it produces.

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<sup>178</sup> House of Commons (2023) What was agreed at COP27? Available at: <https://commonslibrary.parliament.uk/what-was-agreed-at-cop27/>

<sup>179</sup> COP28 UAE | United Nations Climate Change Conference (UNFCCC)

## Issues and Opportunities

Issues and opportunities for climate change and greenhouse gases and the implications for the NLP have been identified in **Table D-16**.

**Table D-16 – Issues and Opportunities for Climate Change and Greenhouse Gases**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ Transport is the largest contributor to GHG emissions in the UK. In LBTH, the largest contributor is from commercial uses;</li> <li>■ Higher than average fuel poverty rates may continue to be a significant issue in the borough;</li> <li>■ Since the Covid-19 pandemic, private car use has increased which contributes to GHG emissions;</li> <li>■ The impacts of the Urban Heat Island (UHI) generated in London will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households;</li> <li>■ There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH; and</li> <li>■ There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit.</li> </ul>	<ul style="list-style-type: none"> <li>■ There is a need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding. The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.</li> <li>■ There is a need to support the continued increase in charging infrastructure to support the demand in electric cars, as well as the modal shift to more sustainable transport.</li> <li>■ The NLP should promote the implementation of Nature-based solutions (NbS) to build resilience to facilitate climate change adaptation, whilst providing a feasible method to sequester and store carbon in line with net zero ambitions.</li> <li>■ There is need for low carbon buildings and energy to support LBTH’s commitment to reach net-zero, to reduce ‘embodied’ and ‘operational’ carbon.</li> <li>■ The NLP should address the demand for on-site renewable energy to reduce national grid dependency.</li> <li>■ The NLP should promote actions to ensure appropriate habitat is created that will be of importance to habitat connectivity and creating resilient</li> </ul>

Key Risks/Opportunities	Implications for the NLP
	<p>functioning ecosystems, to allow wildlife to adapt to climate change.</p> <ul style="list-style-type: none"> <li>■ The NLP should set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.</li> </ul>

## Material Assets (including Soil Resources)

### Summary of Current Baseline

#### Geology and Soils

Government policy promotes development on previously developed land (brownfield land) rather than on greenfield land, to make the most efficient use of a finite resource. The borough’s land is predominantly in urban use<sup>180</sup>.

Southern and eastern England is underlain by a Principal Aquifer, ‘the Chalk’, which usually provides a high level of water storage as a result of its well-developed network of fractures. It may support water supply and/or river base flow on a strategic scale, however these are prone to diffuse pollution<sup>181</sup>. Parts of the borough are underlain by Secondary Aquifers.

The bedrock geology within the borough is predominantly sedimentary bedrock of clay, silt and sand, overlain with superficial deposits sedimentary in origin, deposited in the Quaternary period<sup>182</sup>. The Taplow and Kempton Park Gravels in the borough are classified as Secondary A aquifers and are therefore protected superficial deposits. Gilbert’s Pit (Charlton) SSSI in Greenwich is in closest proximity to LBTH, designated for its geological importance.

London is the world’s biggest centre for investment in the minerals industry, with most of the world’s biggest mining companies listed on the London Stock Exchange<sup>183</sup>. London itself

<sup>180</sup> Natural England (2010) Agricultural Land Classification map London and the South East (ALC007) Available at: <https://publications.naturalengland.org.uk/publication/141047>

<sup>181</sup> British Geological Survey, The Chalk. Available at: <https://www2.bgs.ac.uk/groundwater/shaleGas/aquifersAndShales/maps/aquifers/Chalk.html>

<sup>182</sup> British Geological Survey, Geology Viewer. Available at: [https://geologyviewer.bgs.ac.uk/?\\_ga=2.40981476.739853416.1672832649-1352688571.1672832649](https://geologyviewer.bgs.ac.uk/?_ga=2.40981476.739853416.1672832649-1352688571.1672832649)

<sup>183</sup> London Stock Exchange. Available at: <https://www.londonstockexchange.com/>

has extensive history of mining and quarrying, specifically, chalk mines with associated flint deposits. Recorded extraction sites in LBTH include<sup>184</sup>:

- Bow Rail Depot
- St Thomas Mill Brick Field
- Orchard Wharf

Soil sealing refers to the covering of the ground by an impermeable material and is one of the main causes of soil degradation. Over a third of the borough's surface area is covered by sealed surfaces, such as buildings, roads and car parks<sup>39</sup>. This can have an impact on surface water flooding which is already a prevalent issue in the borough.

Local authorities have a duty to identify contaminated land under Section 78B of the Environmental Protection Act 1990<sup>185</sup>. The borough has a legacy of land contamination as a result of widespread past industrial activity, particularly around the former docks<sup>186</sup>. This is important to consider for the development of brownfield sites, as proper remediation will be required to enable development to take place, and remediation should seek to protect and improve both groundwater and land quality.

## Energy

The commitment of the LBTH to become net zero by 2025, and LBTH net zero by 2045 will require commitments to increasing the supply of renewable energy within the borough. The Mayor of London has set a target to supply 15% of London's overall energy from renewable, local sources by 2030<sup>187</sup>. This is in line with the growth of renewables demand and increased production in the UK<sup>188</sup>.

The borough produces approximately 5.9MW installed capacity from just photovoltaics, performing in the lower half of London boroughs<sup>189</sup>. Throughout the borough, the following renewable energies are currently utilised (2021), with their approximate energy productions:

- Solar photovoltaic (PV) – 692 systems installed, generating 4,449MWh of renewable electricity

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<sup>184</sup> British Geological Survey, GeoIndex. Available at: <https://www.bgs.ac.uk/map-viewers/geoindex-onshore/>

<sup>185</sup> Legislation.gov.uk (1990) Environmental Protection Act 1990. Part IIA Contaminated Land. Available at:

<https://www.legislation.gov.uk/ukpga/1990/43/part/IIA>

<sup>186</sup> Tower Hamlets Council (2022) Strategy for the Identification of Contaminated Land. Available at: [Strategy-for-the-identification-of-contaminated-land.docx \(live.com\)](#)

<sup>187</sup> London Assembly (2022) London's renewable energy future. Available at: <https://www.london.gov.uk/press-releases/assembly/londons-renewable-energy-future>

<sup>188</sup> Gov.uk (2019) Extractive industries in the UK. Available at: <https://www.gov.uk/government/publications/extractive-industries-transparency-initiative-payments-report-2018/extractive-industries-in-the-uk>

<sup>189</sup> Defra (2022) Regional Renewable Statistics. Available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

- Onshore wind – 1 installation, no data on approximate energy production

LBTH is supporting the council commitment to become net zero by further investing into renewable energy generation by installing photovoltaics onto council offices and leisure centres, also aiding households through a separate fund<sup>190</sup>.

## Waste

The UK generated 222 million tonnes of waste in 2018<sup>191</sup>. In LBTH, a total of 113,059 tonnes of waste was collected from the kerbside in 2017/18<sup>192</sup>. Household waste recycling rates in the borough have decreased between 2017/18 (26%) and 2020/21 (19%) by -7%, compared to the rates for London and England which have mainly remained unchanged across this period<sup>193</sup>. The rates in the borough are also significantly lower than the 2020/21 average rates for both London (33%) and England (42%). In 2019/20, LBTH was the fourth-worst local authority for recycling in the whole of the UK. Since 2011/2012, all residual waste produced in the borough has been diverted from going directly to landfill to energy recovery<sup>194</sup>. The energy from waste (EfW) facility is located in Belvedere in the London Borough of Bexley and has an annual capacity of 585,000t with a 66MW output<sup>195</sup>. This process is estimated to save 170,000t of carbon by not sending waste to landfill<sup>196</sup>.

## Future Trends and evolution of the baseline without the NLP

In order for the borough to reach net zero by their respective target dates of 2025 and 2045, the increase of renewable energy supply will be pivotal. Shifting dependency away from non-renewable sources is crucial to meet such ambitions. The projected population increase in the borough will increase energy needs and renewables will be required to meet this demand.

The limitations of space for constructing renewable energy will be challenging as all new buildings must have ultra-low levels of total energy use, however, the NLP present opportunities to incorporate renewable energy as part of the design of new developments.

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<sup>190</sup> Tower Hamlets Council, A Cleaner and Greener Future for Tower Hamlets. Available at: <https://www.towerhamlets.gov.uk/Documents/Climate/Cleaner-Greener-Leaflet.pdf>

<sup>191</sup> Defra (2022) UK statistics on waste. Available at: <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste#total-waste-generation-and-final-treatment-of-all-waste>

<sup>192</sup> Tower Hamlets Council, Waste management strategy 2018-30. Available at: [https://democracy.towerhamlets.gov.uk/documents/s143602/6.4a%20Appendix%201%20-%20WasteStrategy\\_final.pdf](https://democracy.towerhamlets.gov.uk/documents/s143602/6.4a%20Appendix%201%20-%20WasteStrategy_final.pdf)

<sup>193</sup> Defra, Household Waste Recycling Rates, Borough. Available at: [Household Waste Recycling Rates, Borough – London Datastore](#)

<sup>194</sup> Tower Hamlets Council, Draft Waste Management Strategy 2018-2030. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=128934>

<sup>195</sup> Power Technology (2011) The Riverside Resource Recovery Facility Project, UK. Available at: <https://www.power-technology.com/projects/riverside/>

<sup>196</sup> Cory Group (2021) Sustainability Report 2021. Available at: [https://www.corygroup.co.uk/application/files/7216/6066/0318/Cory\\_Sustainability\\_Report\\_2021.pdf](https://www.corygroup.co.uk/application/files/7216/6066/0318/Cory_Sustainability_Report_2021.pdf)

The growing population and associated need for development are also likely to increase the use of mineral resources and waste generation. As such, it will be necessary to apply resource efficiency and waste management measures, including the re-use and recycling of materials.

The absence of the NLP could make it difficult for LBTH to properly plan for the amount of waste it will be expected to manage in the future. It may also compromise the boroughs' ability to plan for the amount of building material it needs to import in order to achieve its growth goals.

### Issues and Opportunities

Issues and opportunities for material assets and the implications for the NLP have been identified in **Table D-17**.

**Table D-17 – Issues and Opportunities for Material Assets**

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> <li>■ The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. This is highly important considering the Belvedere EfW facility processes waste from across London;</li> <li>■ Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population; and</li> <li>■ There is a continued increase in renewable energy supplies across the borough, of which needs to be managed efficiently to ensure the capacity requirements of this transition are met.</li> </ul>	<ul style="list-style-type: none"> <li>■ The NLP should promote actions to protect natural resources, buildings and infrastructure from the impacts of climate change.</li> <li>■ The NLP should protect and conserve the borough's best and most versatile land from development where possible and utilise areas with capacity for growth.</li> <li>■ The NLP should explore innovative ways to manage waste and align principles to support a circular economy when possible.</li> <li>■ The NLP should maximise onsite renewable energy efficiency by making use of vertical solar panels and maximise space by seeking wind solutions through roof-mounted turbines.</li> </ul>

# Appendix E

## Review of Plans, Policies and Programmes

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**Table E-1 – Relevant Plans, Policies, strategies and Programmes - Population and Equalities**

<b>Document</b>	<b>Key Messages/ Issues</b>
The Equality Act, 2010	<p>The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It is against the law to discriminate against anyone because of:</p> <ul style="list-style-type: none"><li>▪ Age;</li><li>▪ Being or becoming a transsexual person;</li><li>▪ Being married or in a civil partnership;</li><li>▪ Being pregnant or having a child;</li><li>▪ Disability;</li><li>▪ Race including colour, nationality, ethnic or national origin;</li><li>▪ Religion, belief or lack of religion/belief;</li><li>▪ Sex; and</li><li>▪ Sexual orientation.</li></ul>
National Planning Policy Framework (NPPF), 2023	<p>When delivering new schemes, applicants must avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the UK Government’s planning guidance. Applicants should provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.</p>
Department for Transport, Transport for Everyone: an action plan to promote equality, 2012	<p>The Action Plan sets what the UK Government is doing to ensure people from all communities in society have the option to use public transport.</p> <p>The main aim of the report is to <i>‘deliver better access to jobs and key services through an accessible and socially inclusive transport system, by removing the barriers to travel and</i></p>

Document	Key Messages/ Issues
	<i>ensuring that social impacts are addressed in policy development and service delivery’.</i>
Strong and Prosperous Communities: The Local Government White Paper, 2006	Deliver better public services through involving and consulting users more fully, providing better information about local standards and managing services at neighbourhood level.
Foresight Mental Capital and Wellbeing Project (2008). Final Project report. The Government Office for Science	As the number of older adults increases substantially in the UK over the next six decades, the existing urban and rural infrastructure will need to be adapted so that the needs of these people are met. For example, issues of access, transport, amenity and security will substantially affect the wellbeing of older people.
Addressing Transport Barriers to work in Low Income Neighbourhoods, Sheffield Hallam University, 2017	<p>Transport is a key factor shaping experiences of poverty. The ability of households in poverty to find paid work often depends on access to affordable, regular and reliable transport.</p> <p>Residents of low-income neighbourhoods generally have a significant reliance on bus services. This can create issues regarding variable frequency, timing, reliability and range of places served.</p> <p>There is considerable evidence that transport issues affect different groups to varying extents and in particular ways, especially in terms of gender.</p> <p>A distinguishing feature of low-income neighbourhoods is the relatively low incidence of motor vehicle ownership. This means that residents have a much higher reliance on public transport than those living in middle and high-income areas.</p>

Document	Key Messages/ Issues
	Difficulties in meeting the costs of transport from current incomes have given rise to the concept of 'transport poverty'.
Build Back Fairer: The Covid-19 Marmot Review, 2020	<p>The Marmot Review identified that the levels of social, environmental and economic inequality in society are damaging health and well-being. This report identifies that as the UK emerges from the pandemic it would be a mistake to attempt to re-establish the status quo that existed before the pandemic.</p> <p>The reductions in car traffic during the pandemic resulted in cleaner air and reduction in emission of greenhouse gases. Walking and cycling as modes of transport became both necessary and desirable. As the pandemic is brought under control and public transport again becomes safe, a future for our cities based on reduction in vehicle traffic and made safe for walking and cycling in addition to public transport is a future we can both imagine and realise.</p> <p>Building Back Fairer requires a sizeable reduction in private car use and greater active travel and use of public transport. Efforts to support this are required urgently and would help to reduce Greenhouse Gas Emissions and lead to a more sustainable environment.</p>
<i>Regional</i>	
Mayor of London, Social Infrastructure: Supplementary Planning Guidance (SPG), 2015	Population growth in London means that it is important to ensure that new development, particularly in Opportunity and Intensification Areas, Areas for Regeneration, and large residential development is supported by necessary social

Document	Key Messages/ Issues
	<p>infrastructure. This is important not only for the quality of life for residents in new developments, but also the quality of life for the existing population, who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in London.</p> <p>This SPG provides guidance for:</p> <ul style="list-style-type: none"> <li>■ Borough planners and public health practitioners in gathering information about places as part of the evidence base for policies in their local plans and in assessing planning applications.</li> <li>■ Developers and their consultants in preparing planning applications in order to ensure that schemes respond to social infrastructure requirements, enabling them to recognise the role of social infrastructure provision in place making and its potential as a driver of value in development projects.</li> <li>■ Community groups and Neighbourhood Forums in understanding the requirements for social infrastructure in their areas to inform the preparation of Neighbourhood Plans.</li> <li>■ Local authority Directors of Public Health to shape and inform their role around planning and social infrastructure-linked to their responsibility for all of their local authority's duties to take steps to improve the health of the people in its area.</li> </ul>
<p>Mayor of London, The London Plan 2021. Chapter 5: Social Infrastructure</p>	<p>The London Plan (2021) is London's Spatial Development Strategy (SDS). It sets out an integrated economic,</p>



Document	Key Messages/ Issues
	<p>environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 5: Social Infrastructure includes:</p> <ul style="list-style-type: none"><li>■ Policy S1 Developing London's social infrastructure</li><li>■ Policy S2 Health and social care facilities</li><li>■ Policy S3 Education and childcare facilities</li><li>■ Policy S4 Play and informal recreation</li><li>■ Policy S5 Sports and recreation facilities</li><li>■ Policy S6 Public toilets</li><li>■ Policy S7 Burial space</li></ul>
<i>Local</i>	
Tower Hamlets Council, Tower Hamlets Equality policy	The equality policy sets out a clear commitment to ensure equality is at the heart of everything the council does; from money spent and the people employed, to the services provided. The council is committed to creating cohesive communities that are strong, fair and inclusive.

**Table E-2 – Relevant Plans, Policies, strategies and Programmes - Human Health**

Document	Key Messages/ Issues
<i>National</i>	
<p>Fair Society, Healthy Lives: The Marmot Review: Strategic review of health inequalities in England post, 2012</p>	<p>Reducing health inequalities is a matter of fairness and social justice. In England, the many people who are currently dying prematurely each year as a result of health inequalities would otherwise have enjoyed, in total, between 1.3 and 2.5 million extra years of life.</p> <p>Ensure a healthy standard of living for all; Create and develop healthy and sustainable places and communities; and strengthen the role and impact of ill health prevention.</p>
<p>Build Back Fairer: The Covid-19 Marmot Review, 2020</p>	<p>The Marmot Review identified that the levels of social, environmental and economic inequality in society are damaging health and well-being. This report identifies that as the UK emerges from the pandemic it would be a mistake to attempt to re-establish the status quo that existed before the pandemic.</p> <p>The reductions in car traffic during the pandemic resulted in cleaner air and reduction in emission of greenhouse gases. Walking and cycling as modes of transport became both necessary and desirable. As the pandemic is brought under control and public transport again becomes safe, a future for our cities based on reduction in vehicle traffic and made safe for walking and cycling in addition to public transport is a future we can both imagine and realise.</p> <p>Building Back Fairer requires a sizeable reduction in private car use and greater active travel and use of public transport. Efforts</p>



Document	Key Messages/ Issues
	to support this are required urgently and would help to reduce Greenhouse Gas Emissions and lead to a more sustainable environment.
NPPF, 2021	<p>Paragraph 92 of the NPPF states:</p> <p><i>'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</i></p> <p><i>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</i></p> <p><i>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'</i></p>
Chartered Institution of Highways and Transportation (CIHT), Better planning, better transport, better places, 2019	Poorly located and designed new development seriously hinders healthy lifestyles. Physical inactivity directly contributes to one in six deaths in the UK, drives rising levels of obesity, and is the

Document	Key Messages/ Issues
	<p>fourth largest cause of disease and disability. It costs society an estimated £7.4 billion a year and places the national healthcare system under increasing financial strain.</p> <p>By enabling compact, higher density, and mixed-use patterns of development. This encourages more people to incorporate physical activity into their daily journeys, improving productivity and dramatically reducing ill health.</p>
<p>Transport, health, and wellbeing: An evidence review for the Department for Transport, 2019</p>	<p>There are three main mechanisms that link transport and health and wellbeing:</p> <ul style="list-style-type: none"> <li>■ Transport and access: Transport plays a key role in improving access to health services, particularly for vulnerable groups like older people.</li> <li>■ Mode of transport: Mode of transport affects physical and mental health, via mechanisms including physical activity and commuting time.</li> <li>■ Wider effects of transport and infrastructure: Transport can facilitate social interactions and promote social inclusion.</li> </ul>
<p>Public Health England, Health Matters, Physical Activity: Prevention and management of long-term conditions</p>	<p>Regular physical activity provides a range of physical and mental health and social benefits, including:</p> <ul style="list-style-type: none"> <li>■ Reducing the risk of many long-term conditions</li> <li>■ Helping manage existing conditions</li> <li>■ Ensuring good musculoskeletal health</li> <li>■ Developing and maintaining physical and mental function and independence</li> <li>■ Supporting social inclusion</li> <li>■ Helping maintain a healthy weight</li> <li>■ Reducing inequalities for people with long-term conditions</li> </ul>

Document	Key Messages/ Issues
	<p>The UK Chief Medical Officers (CMOs’) Physical Activity Guidelines state that for good physical and mental health, adults should aim to be physically active every day. Any activity is better than none, and more is better still.</p> <p>Regular physical activity can help to prevent and manage a range of chronic conditions and diseases, many of which are on the rise and affecting people at an earlier age.</p>
<i>Regional</i>	
<p>Mayor of London, The London Health Inequalities Strategy, 2018</p>	<p>The vision and aims set out in this strategy are derived from an analysis of health inequalities in London, including the variation in healthy life expectancy. It has been further informed by an IIA, and the large response to the public consultation on the draft strategy in 2017. Five key aims have been identified to tackle inequalities and achieve the mayor’s vision in London over the next ten years:</p> <ul style="list-style-type: none"> <li>▪ Healthy Children: Every London Child has a Healthy Start in Life</li> <li>▪ Healthy Minds: All Londoners Share in a City with the Best Mental Health in the World</li> <li>▪ Healthy Places: All Londoners Benefit from an Environment and Economy that Promotes Good Mental and Physical Health</li> <li>▪ Healthy Communities: London’s Diverse Communities are Healthy and Thriving</li> <li>▪ Healthy Living: The Healthy Choice is the Easiest Choice for All Londoners</li> </ul>

Document	Key Messages/ Issues
<i>Local</i>	
<p>Tower Hamlets Health and Wellbeing Board: Tower Hamlets Health and Wellbeing Strategy 2021-2025</p>	<p>The Tower Hamlets Health and Wellbeing board is a statutory committee of the council. The board aims to improve the health and wellbeing of local people and tackle health inequalities. The Health and Wellbeing Strategy 2021-2025 is prepared based upon the needs identified within Tower Hamlets health and wellbeing profile.</p> <p>Ambitions for a ‘healthy borough’:</p> <ul style="list-style-type: none"> <li>▪ Everyone can access safe, social spaces near their home to live healthy lives a community</li> <li>▪ Children and families are healthy happy and confident</li> <li>▪ Young adults have the opportunities, connections, and local support to live healthy lives</li> <li>▪ Middle aged and older people are supported to lived healthy lives and get support early if they need to it</li> <li>▪ Anyone needing help knows where to get it and is supported to find the right help</li> </ul>
<p>Tower Hamlets Spatial Planning and Health Needs Assessment, 2023</p>	<p>This Needs Assessment has been produced to provide detailed guidance on the application of Tower Hamlets existing Local Plan’s policies (2020) in respect of health-related matters. This document highlights the ways in which the planning system can contribute to protecting and improving people’s physical and mental health and promote the creation of healthy places. It explains how the relevant Local Plan policies can be applied to achieve better health outcomes and outlines or signposts other</p>



Document	Key Messages/ Issues
	strategies and initiatives that support and complement the Local Plan policies.

**Table E-3 – Relevant Plans, Policies, strategies and Programmes – Economy and Employment**

Document	Key Messages/ Issues
<i>National</i>	
Growth and Infrastructure Act (2013)	<p>The Act allows the modification or discharge of the affordable housing elements of section 106 agreements in order to make developments more viable.</p> <p>Contains measures to extend permitted development rights to allow single-storey extensions of up to eight metres.</p> <p>Reduces the volume of extra paperwork required with a planning application; removing over-lapping development consent regimes that require multiple extra permissions from different government agencies.</p>
NPPF, 2023	<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including, but not limited to:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Those who require affordable housing;</li> <li>■ Families with children;</li> <li>■ Older people;</li> <li>■ Students;</li> <li>■ People with disabilities;</li> <li>■ Service families;</li> <li>■ Travellers;</li> <li>■ People who rent their homes; and</li> <li>■ People wishing to commission or build their own homes.</li> </ul> <p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</p>
The Enterprise Act (2016)	<p>The Enterprise Act includes measures to:</p> <ul style="list-style-type: none"> <li>■ Establish a Small Business Commissioner to help small firms resolve issues.</li> <li>■ Extend the Primary Authority scheme to make it easier for businesses to access tailored and assured advice from local authorities, giving them greater confidence to invest and grow.</li> <li>■ Protect and strengthen apprenticeships by introducing targets for apprenticeships in public sector bodies in England, and</li> </ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>▪ Establish an Institute for Apprenticeships – an independent, employer-led body that will make sure apprenticeships meet the needs of business.</li> </ul>
UK Industrial Growth Strategy, 2017	<p>The Industrial Strategy sets out a long-term plan to boost the productivity and earning power of people throughout the UK. It sets out how the UK Government is working towards building a Britain fit for the future – how they will help businesses create better higher-paying jobs in every part of the UK with investment in the skills, industries and infrastructure of the future.</p> <p>The strategy includes five foundations:</p> <ul style="list-style-type: none"> <li>▪ Ideas: the world’s most innovative economy</li> <li>▪ People: good jobs and greater earning power for all</li> <li>▪ Infrastructure: a major upgrade to the UK’s infrastructure</li> <li>▪ Business environment: the best place to start and grow a business</li> <li>▪ Places: prosperous communities across the UK</li> </ul> <p>The UK Government will use this strategy to work with industry, academia and civil society over the coming years to build on the UK’s strengths, make more of untapped potential and create a more productive economy that works for everyone across the UK.</p>
The Clean Growth Strategy, 2017	<p>This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e. deliver increased economic growth and decreased emissions. The Strategy has two guiding objectives:</p>

Document	Key Messages/ Issues
	<p>1. To meet our domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses; and,            2. To maximise the social and economic benefits for the UK from this transition.</p> <p>In order to meet these objectives, the UK will need to nurture low carbon technologies, processes and systems that are as cheap as possible.</p>
<i>Regional</i>	
<p>Mayor of London, The London Plan 2021.            Chapter 6: Economy</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 6: Economy includes:</p> <ul style="list-style-type: none"> <li>▪ Policy E1 Offices</li> <li>▪ Policy E2 Providing suitable business space</li> <li>▪ Policy E3 Affordable workspace</li> <li>▪ Policy E4 Land for industry, logistics and services to support London’s economic function</li> <li>▪ Policy E5 Strategic Industrial Locations (SIL)</li> <li>▪ Policy E6 Locally Significant Industrial Sites</li> <li>▪ Policy E7 Industrial intensification, co-location and substitution</li> </ul>



Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Policy E8 Sector growth opportunities and clusters</li> <li>■ Policy E9 Retail, markets and hot food takeaways</li> <li>■ Policy E10 Visitor infrastructure</li> <li>■ Policy E11 Skills and opportunities for all</li> </ul>
<i>Local</i>	
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. Tower Hamlets has a wealth of arts and sporting opportunities. Our local businesses and markets are the lifeblood of the community and should prosper alongside the international business hubs at Canary Wharf, Whitechapel and the City Fringe. At a time of economic uncertainty and rising costs, every resident should be able to access the opportunities on their doorstep.</p> <p>‘Priority 4: Boost culture, business, jobs and leisure’. Ambition is for residents from all backgrounds benefit from thriving sports, the arts, and local business.</p>
Tower Hamlets Council, Tower Hamlets Growth and Economic Development Plan 2018-2023	<p>The Tower Hamlets Growth and Economic Development Plan 2018-2023 aims to build an economy that works for local people and ensure everyone can benefit from the borough’s success. The council’s vision is to create a Tower Hamlets that delivers sustainable and inclusive economic growth enabling all of our residents and businesses to prosper.</p> <p>Priorities:</p> <ul style="list-style-type: none"> <li>■ Priority 1: Preparing our young people for success</li> <li>■ Priority 2: Helping our working age residents to thrive</li> </ul>



Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>Priority 3: Creating the conditions for business growth</li> </ul>

**Table E-4 – Relevant Plans, Policies, strategies and Programmes – Housing**

Document	Key Messages/ Issues
<i>National</i>	
NPPF,2023	<p>To support the Governments objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.</p> <p>Paragraph 65 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.</p> <p>Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p>
Planning for the Future White Paper (2020)	<p>Proposes to reform the planning process bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. The vision is to 'build better, greener and faster'.</p>

Document	Key Messages/ Issues
Housing Act 2004	<p>The Act covers housing conditions, and licensing of houses in multiple occupation and residential accommodation.</p> <p>It requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area and produce a strategy on how these needs can be met.</p>
National Planning Practice Guidance (NPPG) – Housing and economic land availability assessment	<p>This Guidance sets out the method for assessing housing and economic land availability. This is used to identify future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.</p>
NPPG – housing and economic needs assessment	<p>This Guidance helps councils to assess their housing needs.</p> <p>The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.</p>
NPPG Housing needs of different groups	<p>This Guidance provides advice on planning for the housing needs of different groups.</p> <p>Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty.</p> <p>When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.</p>
NPPG – Housing for older and disabled people	<p>This Guidance provides advice in preparing planning policies on housing for older and disabled people.</p>

Document	Key Messages/ Issues
	<p>People are living longer lives and the proportion of older people in the population is increasing. The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.</p> <p>Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.</p> <p>Where an identified need exists, plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing.</p>
NPPG – Housing supply and delivery	<p>This Guidance provides advice on the 5-year housing land supply and Housing Delivery Test.</p> <p>Authorities should use the standard method as the starting point when preparing the housing requirement in their plan. The purpose of the 5-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years.</p>
Growth and Infrastructure Act 2013	<p>The Act allows the modification or discharge of the affordable housing elements of section 106 agreements in order to make developments more viable.</p>

Document	Key Messages/ Issues
	<p>Reduces the volume of extra paperwork required with a planning application, and removing over-lapping development consent regimes, to help to improve efficiency of the planning regulations.</p>
<i>Regional</i>	
<p>Mayor of London, The London Plan 2021. Chapter 4: Housing</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure.</p> <p>Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 4: Housing includes:</p> <ul style="list-style-type: none"> <li>■ Policy H1 Increasing housing supply</li> <li>■ Policy H2 Small sites</li> <li>■ Policy H3 Meanwhile use as housing</li> <li>■ Policy H4 Delivering affordable housing</li> <li>■ Policy H5 Threshold approach to applications</li> <li>■ Policy H6 Affordable housing tenure</li> <li>■ Policy H7 Monitoring of affordable housing</li> <li>■ Policy H8 Loss of existing housing and estate redevelopment</li> <li>■ Policy H9 Ensuring the best use of stock</li> <li>■ Policy H10 Housing size mix</li> <li>■ Policy H11 Build to Rent</li> </ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Policy H12 Supported and specialised accommodation</li> <li>■ Policy H13 Specialist older persons housing</li> <li>■ Policy H14 Gypsy and traveller accommodation</li> <li>■ Policy H15 Purpose-built student accommodation</li> <li>■ Policy H16 Large-scale purpose-built shared living</li> </ul>
<p>Mayor of London, London Plan Guidance (LPG), Affordable Housing, 2023 (consultation draft)</p>	<p>The Affordable Housing LPG provides a further step to implement the London Plan, ensuring that developments assessed through the planning system maximise affordable housing delivery. It sets out how the threshold approach should work in practice and clarifies the requirements of different types of affordable housing and how they should be secured and monitored.</p> <p>Local planning authorities should apply the threshold approach to applications for sites that are capable of delivering 10 or more homes. When developing new policies on affordable housing, planning obligations and Community Infrastructure Levy (CIL) rates, local plans are required to be in general conformity with the London Plan. LPAs should apply the approach to affordable housing in the London Plan and in this LPG as a part of their plan and decision-making processes.</p>
<p>Mayor of London, London Plan Guidance (LPG), Development Vitality, 2023 (consultation draft)</p>	<p>The draft Development Viability LPG builds upon policy of the London Plan and provides a further step towards ensuring that developments assessed through the planning system maximises affordable housing delivery, setting out how viability assessment should be carried out where a planning application follows the Viability Tested Route. It is relevant to all planning applications where an applicant or planning authority needs to rely on viability</p>



Document	Key Messages/ Issues
	information and should be taken account of by planning authorities where area-wide viability testing is being carried out.
<i>Local</i>	
Tower Hamlets Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The housing crisis is the greatest challenge facing London today. In recent years, Tower Hamlets has delivered more homes than any other authority in England. However, there is an acute shortage of social homes. Too many residents live in overcrowded accommodation. The council will work alongside residents, housing providers and landlords to achieve real change.</p> <p>‘Priority 2: Homes for the future’. Ambition is that everyone in Tower Hamlets lives in a good quality home that they can afford.</p>
Tower Hamlets Council, High Density Living SPD, 2020	The High Density Living Supplementary Planning Document (SPD) provides guidance to shape high density development, so it supports good quality of life for Tower Hamlets’ residents.
Tower Hamlets Council, Central Area Good Growth SPD, 2021	The Central Area Good Growth SPD provides guidance to help the council deliver this housing growth, focusing specifically on design guidance to ensure that new developments respect and enhance the well-established character of this part of the borough. The Central Area Good Growth SPD is a material consideration to help determine planning applications for small-scale residential-led developments in the central part of the London Borough of Tower Hamlets.



**Table E-5 – Relevant Plans, Policies, strategies and Programmes – Crime and Safety**

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>Paragraph 92 (b) of the policy states that policies should help to develop places that <i>‘are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas’</i>.</p> <p>Places and developments should also create safe spaces where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p>
National Networks National Policy Statement (NN NPS) (2014)	<p>Paragraphs 3.10 – 3.12 of the NN NPS advise that “<i>scheme promoters are expected to take opportunities to improve road safety, including introducing the most modern and effective safety measures where proportionate</i>”, and that it is the UK Government’s policy to ensure that risks of rail passenger and workforce accidents are reduced so far as reasonably practicable.</p>
Crime and Disorder Act, 1998	<p>The Crime and Disorder Act 1998 gave statutory responsibility to local authorities, the police, and key partners to reduce crime and disorder in their communities. Responsible authorities, commonly referred to now as Community Safety Partnerships (CSPs), were required to carry out audits every three years and to implement crime reduction strategies.</p>

Document	Key Messages/ Issues
<p>Highways England Delivery Plan 2015-2020, 2015</p>	<p>Whilst the number of people KSI on UK roads has generally been declining since 2005, over the last few years the number of fatalities has remained fairly consistent with a small increase in KSIs in 2013.</p> <p>Highways England recognise that they must continue to improve safety by investing in the road network, both to prevent incidents from occurring and to reduce the severity of those that do.</p> <p>By end of 2020, they aim to have reached a target of no more than 1,393 KSIs across the network in a year. This will be achieved by a year-on-year reduction in those harmed across the network.</p>
<p>Department for Transport, Road Investment Strategy: for the 2015/16 – 2019/20 Road Period, 2015</p>	<p>Safety is an important consideration for road users owing to the significant impact of serious and fatal accidents. A considerable economic cost is also associated with collisions on all roads, estimated at £15 billion annually to the UK economy.</p> <p>While driverless technology still has to mature, it clearly has the potential to transform the UK’s transport networks – improving safety, reducing congestion, and lowering emissions.</p> <p>Safety and the environment suffering as congested traffic is more polluting and there is an increased risk of accidents.</p> <p>The Strategic Road Network and local networks should work together to provide flexibility and door-to door connectivity for all users. Schemes such as the A453 upgrade highlighted below do just this, and we have also set aside funding in the ring-fenced Cycling, Safety, and Integration Fund to further support connectivity with local networks.</p>
<p><i>Regional</i></p>	



Document	Key Messages/ Issues
Mayor of London, London's Police and Crime Plan 2022-25	<p>The Mayor's Police and Crime Plan sets out his vision for a city in which Londoners are safer – and feel safer. It sets out the key priorities and objectives for policing and community safety in London over the next three years.</p> <p>The four key themes of the Plan are:</p> <ul style="list-style-type: none"><li>■ Reducing and preventing violence – preventing and reducing violence affecting young people; making London a city in which women and girls are safer and feel safer; tackling the harm caused by drugs; reducing reoffending by the most violent and high-risk groups; preventing hate crime; and working together to prevent terrorism and violent extremism.</li><li>■ Increasing trust and confidence – increasing public trust in the Metropolitan Police Service (MPS) and reducing gaps in confidence between different groups; ensuring that the MPS engages with Londoners and treats them fairly; and ensuring that the MPS, borough councils and all community safety partners respond to neighbourhood crimes such as burglary and anti-social behaviour.</li><li>■ Better supporting victims – improving the service and support that victims receive from the MPS and the criminal justice service; working to ensure victims receive a better criminal justice response and outcome; and reducing the number of repeat victims of domestic abuse and sexual violence.</li><li>■ Protecting people from being exploited or harmed – reducing the number of young people and adults who are criminally exploited or harmed; keeping young people in the justice system supported and safe; and keeping people safe online.</li></ul>

Document	Key Messages/ Issues
<i>Local</i>	
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The council will assist the police in their fight against crime with more council-funded uniformed police officers, conduct regular surgeries and walkabouts to listen to the community, and lend support to police ward-based forums and increased community policing. Working as part of the Tower Hamlets Community Safety Partnership, the council will support safe spaces, and tackle substance misuse, hate crime, violence against women and girls, and safeguard people who are vulnerable from exploitation and radicalisation.</p> <p>‘Priority 6: Empower Communities and Fight Crime’. Ambition is for residents, workers and visitors of all backgrounds feel safe and welcome in Tower Hamlets.</p>
Tower Hamlets Council, Community Safety Partnership Plan (2021-2024)	<p>The CSP Plan 2021-24 sets out how the council will make Tower Hamlets a safer and more cohesive place to live. The plan has been developed in response to crime, anti-social behaviour, substance misuse and re-offending statistics, and the concerns of local people. In 2021- 2024 our community safety work will focus on:</p> <ul style="list-style-type: none"> <li>■ Priority 1: Tackling neighbourhood crime and antisocial behaviour (ASB)</li> <li>■ Priority 2: Tackling hate crime, community tensions and extremism</li> <li>■ Priority 3: Reducing reoffending and tackling the drivers of crime</li> <li>■ Priority 4: Safeguarding those at risk of violence and exploitation</li> </ul>

**Table E-6 – Relevant Plans, Policies, strategies and Programmes – Transport and Accessibility**

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>Paragraph 104 - Transport issues should be considered from the earliest stages of plan-making and development proposals so that potential impacts and opportunities are addressed.</p> <p>Paragraph 105 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p> <p>Paragraph 106 – Planning policies should:</p> <ul style="list-style-type: none"> <li>▪ support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;</li> <li>▪ be prepared with the active involvement of local highways authorities;</li> <li>▪ identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</li> <li>▪ provide for attractive and well-designed walking and cycling networks; and</li> <li>▪ recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time</li> </ul> <p>Paragraph 112 - address the needs of people with disabilities and reduced mobility in relation to all modes of transport.</p>

Document	Key Messages/ Issues
	Paragraph 112 – Developments should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
Department for Transport, Transport Investment Strategy, 2017	<p>This Strategy sets out how the government will build on recent transport progress and how they intend to respond realistically and pragmatically to today’s challenges.</p> <p>They aim to create a more reliable, less congested, and better-connected transport network that works for the users who rely on it. Through investment they aim to achieve:</p> <ul style="list-style-type: none"> <li>■ A network that is reliable, well-managed, and safe;</li> <li>■ Journeys that are smooth, fast, and comfortable; and</li> <li>■ The right connections in the right places</li> </ul>
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 10: Transport	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 10: Transport includes:</p> <ul style="list-style-type: none"> <li>■ Policy T1 Strategic approach to transport</li> <li>■ Policy T2 Healthy Streets</li> </ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Policy T3 Transport capacity, connectivity and safeguarding</li> <li>■ Policy T4 Assessing and mitigating transport impacts</li> <li>■ Policy T5 Cycling</li> <li>■ Policy T6 Car parking</li> <li>■ Policy T6.1 Residential parking</li> <li>■ Policy T6.2 Office Parking</li> <li>■ Policy T6.3 Retail parking</li> <li>■ Policy T6.4 Hotel and leisure uses parking</li> <li>■ Policy T6.5 Non-residential disabled persons parking</li> <li>■ Policy T7 Deliveries, servicing and construction</li> <li>■ Policy T8 Aviation</li> <li>■ Policy T9 Funding transport infrastructure through planning</li> </ul>
<p>Mayor of London, Mayor’s Transport Strategy, 2018</p>	<p>The Mayor's Transport Strategy sets out the Mayor’s policies and proposals to reshape transport in London over the next two decades. The central aim of the Mayor’s Transport Strategy is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, and for all Londoners to do at least 20 minutes of active travel each day by 2041.</p> <p>Key themes of the strategy:</p> <ul style="list-style-type: none"> <li>■ Healthy streets and healthy people – Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates</li> <li>■ A good public transport experience – Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport</li> </ul>

Document	Key Messages/ Issues
	<p>could dramatically reduce the number of vehicles on London’s streets</p> <ul style="list-style-type: none"> <li>■ New homes and jobs – More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone</li> </ul> <p>The Healthy Streets Approach is the framework of the strategy. Boroughs can deliver the Healthy Streets Approach in ways that suits the needs and aspirations of their residents and the unique character of their streets through public realm improvements and local policies that promote sustainable travel and deduce the dominance of motorised traffic. Adopting the Healthy Streets Approach is also a requirement of Local Implementation Plan funding and will help boroughs to fulfil their public health duties.</p> <p>Practical steps to achieving healthy streets for London:</p> <ul style="list-style-type: none"> <li>■ Improving local environments by providing more space for walking and cycling, and better public spaces where people can interact</li> <li>■ Prioritising better and more affordable public transport and safer and more appealing routes for walking and cycling</li> <li>■ Planning new developments so people can walk or cycle to local shops, schools and workplaces, and have good public transport links for longer journeys</li> </ul>
TfL, Healthy Streets for London, 2017	Although the initial strategy is based in London, the approach is becoming more widely adopted nationally. The Healthy Streets Approach puts people and their health at the centre of decisions

Document	Key Messages/ Issues
	<p>about how we design, manage and use public spaces. It aims to make our streets healthy, safe and welcoming for everyone.</p> <p>The Approach is based on 10 Indicators of a Healthy Street which focus on the experience of people using streets. These are as follows:</p> <ul style="list-style-type: none"> <li>■ Pedestrians from all walks of life;</li> <li>■ Easy to cross;</li> <li>■ People chose to walk, cycle and use public transport;</li> <li>■ Clean air;</li> <li>■ People feel safe;</li> <li>■ Not too noisy;</li> <li>■ Places to stop and rest;</li> <li>■ Shade and shelter;</li> <li>■ People feel relaxed; and</li> <li>■ Things to see and do.</li> </ul>
<i>Local</i>	
Tower Hamlets Council, Transport strategy 2019-41	<p>Vision: Tower Hamlets has a healthy, safe and environmentally friendly transport system that is accessible and affordable for all who live, work, study and do business in the borough. Desired outcomes:</p> <ul style="list-style-type: none"> <li>■ Outcome 1: Tower Hamlets is one of the best places to walk and cycle in London</li> <li>■ Outcome 2: Car use is reduced in favour of active, efficient and sustainable transport</li> <li>■ Outcome 3: Transport services meet the needs of residents, visitors, businesses and supports growth and the economy</li> </ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>▪ Outcome 4: People feel safe and confident when travelling in the borough</li> <li>▪ Outcome 5: Air quality is improved and our surroundings are quieter and more appealing</li> <li>▪ Outcome 6: Travel in Tower Hamlets is accessible and affordable for all</li> </ul>

**Table E-7 – Relevant Plans, Policies, strategies and Programmes – Biodiversity and Natural Capital**

Document	Key Messages/ Issues
<i>International</i>	
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)	<p>The convention has three main aims which are stated in Article 1:</p> <ul style="list-style-type: none"> <li>▪ To conserve wild flora and fauna and their natural habitats;</li> <li>▪ To promote cooperation between states; and</li> <li>▪ To give particular attention to endangered and vulnerable species including endangered and vulnerable migratory species.</li> </ul>
Conservation of Natural Habitats and Wild Fauna & Flora (the ‘Habitats Directive’) (1992)	<p>The identification of a European network of Sites of Community Importance to be designated as SACs. A SA would need to report on any potential effects on SACs and all development plans should aim to avoid adverse effects on them.</p>



Document	Key Messages/ Issues
EU (2011) EU Biodiversity Strategy to 2020 – towards implementation	<p>Aimed at halting the loss of biodiversity and ecosystem services in the EU by 2020, the strategy provides a framework for action over the next decade and covers the following key areas:</p> <ul style="list-style-type: none"><li>■ Conserving and restoring nature;</li><li>■ Maintaining and enhancing ecosystems and their services;</li><li>■ Ensuring the sustainability of agriculture, forestry and fisheries;</li><li>■ Combating invasive alien species; and</li><li>■ Addressing the global biodiversity crisis.</li></ul>
EU (2013) 7th Environment Action Programme (EAP) to 2020	<p>The 7<sup>th</sup> EAP guided EU environmental policy up to 2020 and set ambitions for 2050. The Programme set the following as a priority objective: “to protect, conserve and enhance the Union’s natural capital.”</p> <p>The 7<sup>th</sup> EAP reflects the EU’s commitment to the preservation of biodiversity and the ecosystem services it provides for both its intrinsic value and its contribution to economic well-being.</p> <p>The Programme highlights that integrating the value of ecosystem services into accounting and reporting across the Union and its member states by 2020 will result in the better management of natural capital.</p>
The Convention on Biological Diversity’s (CBD’s) Strategic Plan for Biodiversity 2011-2020	<p>This plan provides an overarching framework on biodiversity, for all biodiversity-related conventions, the entire United Nations system and all other partners engaged in biodiversity management and policy development.</p> <p>The plan consists of five strategic goals of which 20 further Aichi goals which include:</p>

Document	Key Messages/ Issues
	<p>Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across Government and society.</p> <ul style="list-style-type: none"> <li>▪ Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use.</li> <li>▪ Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity.</li> <li>▪ Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services.</li> <li>▪ Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building.</li> </ul>
<p>Ramsar Convention on the Conservation on Wetlands of International Importance (1971)</p>	<p>The Ramsar Convention covers all aspects of wetland conservation. It has three main pillars of activities:</p> <ul style="list-style-type: none"> <li>▪ The designation of wetlands of international importance as Ramsar sites;</li> <li>▪ The promotion of the wise use of all wetlands in the territory of each country; and</li> <li>▪ International co-operation with other countries to further the wise use of wetlands and their resources.</li> </ul> <p>While the initial emphasis was on selecting sites of importance to waterbirds, now non-bird features are increasingly taken into account, both in the selection of new sites and when reviewing existing sites.</p>
<p>Kunming-Montreal Global Biodiversity Framework (GBF)</p>	<p>The 15th Conference of Parties to the UN Convention on Biological Diversity adopted the “Kunming-Montreal Global Biodiversity Framework” which includes four goals and 23 targets for achievement by 2030.</p>

Document	Key Messages/ Issues
	<p>The implementation of the Kunming-Montreal Global Biodiversity Framework will be guided and supported through a comprehensive package of decisions also adopted at COP 15. This package includes a monitoring framework for the GBF, an enhanced mechanism for planning, monitoring, reporting and reviewing implementation, the necessary financial resources for implementation, strategic frameworks for capacity development and technical and scientific cooperation, as well as an agreement on digital sequence information on genetic resources.</p> <p>In adopting the Kunming-Montreal Global Biodiversity Framework, all Parties committed to setting national targets to implement it, while all other actors have been invited to develop and communicate their own commitments. At the next meeting of the Conference of the Parties in 2024 in Türkiye, the world will take stock of the targets and commitments that have been set.</p>
UNEP and ELD, State of Finance for Nature, 2022	<p>Time to act: Doubling investment by 2025 and eliminating nature-negative finance flows. The State of Finance for Nature (SFN) 2022 report quantifies public and private finance flows to nature-based solutions (NbS) to tackle global challenges related to biodiversity loss, land degradation and climate change. The SFN 2022 report reveals that if the world wants to halt biodiversity loss, limit climate change to below 1.5C and achieve land degradation neutrality by 2030, current finance flows to NbS must urgently double by 2025 and triple by 2030.</p>
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the</p>



Document	Key Messages/ Issues
	<p>UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>The Biodiversity Gain objective requires the biodiversity value attributable to a development to exceed pre-development biodiversity value by at least 10%.</p>
<p>HM Government, 25 Year Environment Plan, 2018</p>	<p>The 25 Year Environment Plan outlines the UK Government’s ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition.</p> <p>The Plan includes ten key targets of which two focus on biodiversity.</p> <p><u>Thriving plants and wildlife:</u></p> <ul style="list-style-type: none"> <li>■ Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term;</li> <li>■ Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits;</li> <li>■ Taking action to recover threatened, iconic or economically important species of animals, plants and fungi and where possible to prevent human-induced extinction or loss of known threatened species in England and the Overseas Territories;</li> <li>■ Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042.</li> </ul> <p><u>Enhancing biosecurity:</u></p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Managing and reducing the impact of existing plant and animal diseases; lowering the risk of new ones and tackling invasive non-native species;</li> <li>■ Reaching the detailed goals to be set out in the Tree Health Resilience Plan of 2018;</li> <li>■ Ensuring strong biosecurity protection at our borders, drawing on the opportunities leaving the EU provides; and</li> <li>■ Working with industry to reduce the impact of endemic disease.</li> </ul>
HM Government, Environmental Improvement Plan 2023	<p>The 25 Year Environment Plan set out the ambition to refresh the plan every five years, a commitment set into law in the Environment Act 2021. This document continues to use the ten goals set out in the 25 Year Environment Plan; however, ‘Thriving Plants and Wildlife’ has since become the apex goal. It outlines the progress made so far and how Defra intends to deliver the framework and vision of the 25 Year Environment Plan.</p>
Wildlife and Countryside Act (as amended 1981)	<p>The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version).</p> <p>The Act provides for the notification and confirmation of SSSIs and the protection of wildlife.</p>

Document	Key Messages/ Issues
<p>Working with the grain of nature: A Biodiversity Strategy for England 2002</p>	<p>The Biodiversity Strategy for England sets a fundamental shift by ensuring that biodiversity considerations become embedded in all the main sectors of economic activity, public and private. The Strategy capitalises on the opportunities presented by the report of the Policy Commission on Food and Farming and the current review of the Common Agricultural Policy.</p> <p>The Strategy sets out a programme for five years for the other main policy sectors, to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems rather than against them. It takes account of climate change as one of the most important factors affecting biodiversity and influencing policies.</p>
<p>The Natural Environment White Paper (2011)</p>	<p>The aim of the White Paper is to set out a clear framework for protecting and enhancing the things that nature gives us for free.</p> <p>Four core themes:</p> <ol style="list-style-type: none"> <li>1. Protecting and improving our natural environment</li> <li>2. Growing a green economy</li> <li>3. Reconnecting people and nature</li> <li>4. International and EU leadership</li> </ol>
<p>Making Space for Nature: A review of England's Wildlife Sites and Ecological Network: Chaired by Professor Sir John Lawton CBE FRS (2010)</p>	<p>Species and habitats should be restored and enhanced in comparison with 2000 levels.</p> <p>Improve the long-term sustainability of ecological and physical processes that underpin the functioning of ecosystems, thereby enhancing the capacity of ecosystem services.</p>

Document	Key Messages/ Issues
	Provide accessible natural environments rich in wildlife for people to enjoy and experience.
The Natural Choice: Securing the value of nature; HM Government (2011)	Protect and enhance biodiversity through Nature Improvement Areas (NIAs), biodiversity offsetting, Local Nature Partnerships and phasing out peat use.  Place natural capital at the centre of economic decision making to avoid the unintended environmental consequences that arise from undervaluing natural assets.
NN NPS, (2014)	<p>NN NPS states that development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation to counteract impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.</p> <p>Paragraphs 3.2 to 3.5 of the NN NPS state that not only should national road and rail networks be designed to minimise social and environmental impacts, but that they should also seek to improve quality of life. In part this may be achieved by <i>“reconnecting habitats and ecosystems [...] improving water quality and reducing flood risk, [...] and addressing areas of poor air quality.”</i></p> <p>Paragraph 5.162 recognises the potential for developments to provide positive environmental and economic benefits through the provision of green infrastructure. Paragraph 5.175 of the NN NPS highlights that</p>

Document	Key Messages/ Issues
	green infrastructure identified in development plans should be protected and, where possible, enhanced.
NPPF, 2023	<p>Paragraphs 174 and 179 to 182 of the NPPF require development to protect and safeguard biodiversity, and advise that development should aim to conserve, restore and enhance biodiversity adequately through mitigation or, as a last resort, using compensation. Proposals which aim to conserve or enhance biodiversity should be supported.</p> <p>Recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the UK Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Paragraph 174 of the NPPF requires that planning decisions should be taken to enhance the natural environment by recognising the wider benefits from natural capital and ecosystem services. Further, Paragraph 175 requires plans to take a strategic approach to maintaining and enhancing green infrastructure networks and improving natural capital at a catchment or landscape scale.</p>
The State of Natural Capital: Restoring our Natural Assets; Natural Capital Committee (2014)	<p>The report identifies that:</p> <ul style="list-style-type: none"> <li>■ Some assets are currently not being used sustainably and the benefits that we derive from them are at risk;</li> <li>■ There are major economic benefits to be gained from natural capital and that their value should be incorporated into decision making; and</li> <li>■ A long-term restoration plan is necessary to maintain and improve natural capital for future generations.</li> </ul>

Document	Key Messages/ Issues
<p>The State of Natural Capital; Natural Capital Committee (2020)</p>	<p>In the report, the Natural Capital Committee sets out:</p> <ul style="list-style-type: none"> <li>■ Despite some improvements, only limited progress has been made towards the 25 Year Environment Plan’s goals.</li> <li>■ Its advice to Government that biodiversity net gain should be expanded to environmental net gain.</li> <li>■ Its advice that an England wide baseline of natural capital assets should be established to measure progress towards environmental goals.</li> </ul> <p>Natural capital should be seen as infrastructure in its own right, in recognition of its contribution to economic wellbeing.</p>
<p>Natural Environment and Rural Communities (NERC) Act 2006</p>	<p>Makes provision about bodies concerned with the natural environment and rural communities, wildlife, sites of special scientific interest, National Parks and the Broads, rights of way, and other functions relating to the environment and rural affairs. Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (or the ‘Biodiversity Duty’) states that: “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p>You should be able to show your duty to have regard for conserving biodiversity if you have identified ways to integrate biodiversity when you:</p> <ul style="list-style-type: none"> <li>■ develop policies and strategies and put them into practice</li> <li>■ manage the planning system</li> <li>■ manage: <ul style="list-style-type: none"> <li>– your land and buildings</li> </ul> </li> </ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>– woodlands and nature reserves</li> <li>– gardens, parks and public open space</li> <li>– community amenities e.g., sports grounds and cemeteries</li> <li>– waste and pollution</li> <li>– energy and water</li> <li>– wood and plant products</li> </ul> <ul style="list-style-type: none"> <li>■ develop infrastructure, such as roads, buildings or flood defences</li> <li>■ make decisions about procurement</li> <li>■ implement economic, environmental and social programmes</li> </ul>
<p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</p>	<p>10.—(1) The appropriate agency must, for each river basin district, maintain, review and keep up to date a register of the protected areas lying (whether wholly or partly) within the district. (2) The register must include the following protected areas—</p> <p>(iv) areas designated for the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in the protection of the habitats or species.</p>
<p><i>Regional</i></p>	
<p>Mayor of London, The London Plan 2021. Chapter 8: Green Infrastructure and Natural Environment</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve</p>

Document	Key Messages/ Issues
	<p>relevant stakeholders, including the local community. Chapter 8: Green Infrastructure and Natural Environment includes:</p> <ul style="list-style-type: none"> <li>■ Policy G1 Green infrastructure</li> <li>■ Policy G2 London’s Green Belt</li> <li>■ Policy G3 Metropolitan Open Land</li> <li>■ Policy G4 Open space</li> <li>■ Policy G5 Urban greening</li> <li>■ Policy G6 Biodiversity and access to nature</li> <li>■ Policy G7 Trees and woodlands</li> <li>■ Policy G8 Food growing</li> <li>■ Policy G9 Geodiversity</li> </ul>
<i>Local</i>	
Tower Habitats, Tower Hamlets Local Biodiversity Action Plan 2019-2024	The Local Biodiversity Action Plan (LBAP) for Tower Hamlets sets priorities and targets for conservation of species and habitats across the borough and provides details of what actions we will undertake to achieve these targets. Organisations signed up to these actions include Council departments, Tower Hamlets Homes and other housing associations, charities such as Thames21 and community groups such as the Friends of Tower Hamlets Cemetery Park.
Tower Hamlets, Green Grid Strategy, 2017	The Green Grid Strategy provides a framework for the design and delivery of appealing walking routes and associated green infrastructure across Tower Hamlets, to secure a healthy and attractive environment for residents, workers and visitors.



Document	Key Messages/ Issues
	The strategy proposes a number of borough-wide strategic actions, a set of overarching design principles, a number of site-specific improvements.

**Table E-8 – Relevant Plans, Policies, strategies and Programmes – Landscape and Townscape**

Document	Key Messages/ Issues
<i>International</i>	
<p>European Landscape Convention 2000 (Became binding March 2007)</p>	<p>The Council of Europe Landscape Convention promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. Specific measures include:</p> <ul style="list-style-type: none"> <li>▪ raising awareness of the value of landscapes among all sectors of society and of society's role in shaping them;</li> <li>▪ promoting landscape training and education among landscape specialists, other related professions and in school and university courses;</li> <li>▪ the identification and assessment of landscapes,</li> <li>▪ analysis of landscape change, with the active participation of stakeholders;</li> <li>▪ setting objectives for landscape quality, with the involvement of the public; and</li> <li>▪ the implementation of landscape policies through the establishment of plans and practical programmes.</li> </ul>
<i>National</i>	
<p>Accessible Natural Green Space Standards in Towns and Cities: A review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</p>	<p>English Nature (now Natural England) recommends that provision should be made of at least 2ha of accessible natural greenspace per 1000 population according to a system of tiers into which sites of different sizes fit:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ No person should live more than 300m from their nearest area of natural greenspace;</li> <li>■ There should be at least one accessible 20ha site within 2km from home;</li> <li>■ There should be one accessible 100ha site within 5km; and</li> <li>■ There should be one accessible 500ha site within 10km.</li> </ul>
Guidance for Outdoor Sport and Play (2015)	Fields in Trust guidance, first published in the 1930s, is based on a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1,000 head of population enables residents of all ages to participate in sport and play; 75% of local authorities adopt this or an equivalent standard (2014 Fields in Trust / David Lock Associates Survey).
Local Green Infrastructure: helping communities make the most of their landscape: Landscape Institute for Green Infrastructure Partnership (2011).	Communities should identify green infrastructure requirements in their local area through addition to or creative enhancement of the existing network. Look to enhance local landscape character, heritage and biodiversity and ensure long term management is included in an overall strategy.
Green Infrastructure: An integrated approach to landscape use. Landscape Institute Position Statement (2013)	The Landscape Institute's most recent position statement, 'Green Infrastructure LI Position Statement 2013' sets out why GI is crucial to our sustainable future. The publication showcases a range of successful GI projects and shows how collaboration is key to delivering multifunctional landscapes. It also illustrates why landscape professionals should take the lead on the integration of GI.

Document	Key Messages/ Issues
National Policy Statement for National Networks (2014)	Paragraph 5.149 states that when judging the impact of a project on landscape, the decision is dependent on the nature of the existing landscape likely to be affected and the nature of the effect likely to occur. The project should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
25 Year Environment Plan (2018)	Goal 6: Enhancing beauty, heritage and engagement with the natural environment, is to “safeguard and enhance the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.”
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 3: Design	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 3: Design includes:</p> <ul style="list-style-type: none"> <li>■ Policy D1 London’s form, character and capacity for growth</li> <li>■ Policy D2 Infrastructure requirements for sustainable densities</li> <li>■ Policy D3 Optimising site capacity through the design-led approach</li> </ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Policy D4 Delivering good design</li> <li>■ Policy D5 Inclusive design</li> <li>■ Policy D6 Housing quality and standards</li> <li>■ Policy D7 Accessible housing</li> <li>■ Policy D8 Public realm</li> <li>■ Policy D9 Tall buildings</li> <li>■ Policy D10 Basement development</li> </ul>
<p>Mayor of London, The London Plan 2021. Chapter 7: Heritage and Culture</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 7: Heritage and Culture includes:</p> <ul style="list-style-type: none"> <li>■ Policy HC3 Strategic and Local Views</li> <li>■ Policy HC4 London View Management Framework</li> <li>■ Policy HC5 Supporting London’s culture and creative industries</li> <li>■ Policy HC6 Supporting the night-time economy</li> <li>■ Policy HC7 Protecting public houses</li> </ul>
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The</p>



Document	Key Messages/ Issues
	<p>strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> <li>▪ London Plan</li> <li>▪ Transport</li> <li>▪ Housing</li> <li>▪ Economic Development</li> <li>▪ Culture</li> <li>▪ Health Inequalities</li> </ul> <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> <li>▪ Green infrastructure. London will be the world’s first National Park City, where more than half of its area is green, where the natural environment is protected, and where the network of green infrastructure is managed to benefit all Londoners</li> </ul>
<i>Local</i>	
Tower Hamlets Council, Tall Buildings SPD ( <i>Draft</i> )	The Tall Buildings SPD is a proposed planning document that will add guidance to the design, location and development of tall buildings and address the overall impact that this development can have on local residents.

**Table E-9 – Relevant Plans, Policies, strategies and Programmes – Historic Environment**

Document	Key Messages/ Issues
<i>International</i>	
UNESCO, The World Heritage Convention, 1972	This convention sets out a framework for the identification and designation of cultural or natural heritage sites of ‘outstanding universal value’ as World Heritage Sites.
The Valetta Convention, 1992	<p>This convention outlines protection measures for archaeological heritage assets, including the development and maintenance of an inventory of sites. The aim of this convention is to protect sites for future study, outlines the requirements to report ‘chance finds’, as well as controlling excavations.</p> <p>The input of expert archaeologists into the making of planning policies and decisions is also required under this convention.</p>
Convention for the Protection of the Architectural Heritage of Europe, Granada (1985)	<p>The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe’s heritage. It affirms the needs for European solidarity with regard to heritage conservation and is designed to foster practical co-operation among the Parties.</p> <p>The convention considers comprising the following permanent properties, which are stated in Article 1:</p> <ul style="list-style-type: none"> <li>▪ Monuments: all buildings and structures of conspicuous historical, archaeological, artistic, scientific, social or technical interest, including their fixtures and fittings;</li> <li>▪ Groups of buildings: homogenous groups of urban or rural buildings conspicuous for their historical, archaeological,</li> </ul>

Document	Key Messages/ Issues
	<p>artistic, scientific, social or technical interest, which are sufficiently coherent to form topographically definable units; and</p> <ul style="list-style-type: none"> <li>▪ Sites: the combined works of man and nature, being areas which are partially built upon and sufficiently distinctive and homogenous to be topographically definable and are of conspicuous historical, archaeological, artistic, scientific, social or technical interest.</li> </ul>
<i>National</i>	
NPPF, 2023	<p>Paragraph 190 states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> <li>a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</li> <li>b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</li> <li>c) the desirability of new development making a positive contribution to local character and distinctiveness; and</li> <li>d) opportunities to draw on the contribution made by the historic environment to the character of a place”.</li> </ul>



Document	Key Messages/ Issues
NN NPS (2014)	Paragraph 5.149 states that when judging the impact of a project on landscape, the decision is dependent on the nature of the existing landscape likely to be affected and the nature of the effect likely to occur. The project should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
25 Year Environment Plan (2018)	Goal 6: Enhancing beauty, heritage and engagement with the natural environment, is to “safeguard and enhance the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.”
Planning (Listed buildings and Conservation Areas) Act 1990	This is an Act relating to special controls in respect of buildings and areas of special architectural or historic interest.
1979 Ancient Monuments and Archaeological Areas Act	Where Ancient Monuments occur on agricultural land the following Act influences the extent of public control to ensure the protection of scheduled ancient monuments.
Historic England, The Historic Environment and Site Allocations in Local Plans	This advice note supports Local Plan development and outlines how to correctly implement historic environment legislation within Local Plans. The note also outlines how to minimise harm to the significance and setting of the historic environment through site allocations, including advice on evidence gathering and site selection methodology.



Document	Key Messages/ Issues
Historic England, Sustainability Appraisal and Strategic Environmental Assessment	Advice to support the assessment of plans on the historic environment and advice on heritage considerations for SA and (SEA processes). The advice note also offers guidance on implementing historic environment legislation appropriately within plans and assessments.
Historic England, The Setting of Heritage Assets	Guidance on managing the change within the settings of heritage assets through development. Outlines the role that setting plays in the significance of heritage assets and outlines how to incorporate heritage assets and their settings in decision making of developments.
Historic England Advice Note 4 Tall Buildings 2022	This Advice Note (HEAN 4) provides advice on planning for tall buildings within the historic environment. Its purpose is to support LPAs, developers, communities and other stakeholders in dealing with tall buildings proposals within the legislative and planning framework relevant to the historic environment.
Historic England, Managing Local Authority Heritage Assets	Guidance for local authorities regarding best practice guidance on how to safeguard and enhance heritage assets, as well as bringing them into productive use.
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 7: Heritage and Culture	The London Plan (2021) is London's Spatial Development Strategy (SDS). It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social



Document	Key Messages/ Issues
	<p>infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 7: Heritage and Culture includes:</p> <ul style="list-style-type: none"><li>■ Policy HC1 Heritage conservation and growth</li><li>■ Policy HC2 World Heritage Sites</li></ul>
<i>Local</i>	
Tower Hamlets Council, Conservation Strategy 2017-2027	<p>The Conservation Strategy aims to protect and enhance Tower Hamlets' heritage and ensure that it can be appreciated and enjoyed by current and future generations. A key part of this is to ensure increased community engagement and involvement in the heritage as a critical part of ensuring its on-going sustainability. The Strategy also aims to enhance the contribution of the heritage to other strategic priorities of the borough, to ensure that heritage plays an active role in the borough's on-going regeneration and development, thereby helping to improve quality of life for all.</p> <p>The vision for the Tower Hamlets Conservation Strategy consists of three aims:</p> <ul style="list-style-type: none"><li>■ Aim 1 Understanding and appreciating our rich heritage, and recognising its contribution to the borough's vibrancy and distinctiveness</li><li>■ Aim 2 Conserving and protecting the borough's historic environment, and capitalising on opportunities for attracting investment, conservation-led regeneration and positive place shaping</li></ul>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>▪ Aim 3 Enjoying, celebrating and engaging with our rich history, and promoting Tower Hamlets as a distinctive and welcoming place to live, work and visit for current and future generations</li> </ul>
London Borough of Tower Hamlets conservation area appraisals	There are 58 conservation areas in Tower Hamlets. Each one has an adopted character appraisal and management guidelines document. These describe the architectural and historic character and significance of each area, and provide guidance to residents, businesses and other stakeholders about how the character can be preserved and enhanced.

**Table E-10 – Relevant Plans, Policies, strategies and Programmes – Water Environment**

Document	Key Messages/ Issues
<i>International</i>	
Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (“The Water Framework Directive”)	<p>The main aims of the Water Framework Directive (WFD) are to:</p> <ul style="list-style-type: none"> <li>▪ prevent deterioration and enhance status of aquatic ecosystems, including groundwater</li> <li>▪ promote sustainable water use</li> <li>▪ reduce pollution</li> <li>▪ contribute to the mitigation of floods and droughts</li> </ul> <p>The WFD requires the creation of River Basin Management Plans (RBMPs).</p> <p>Statutory objectives are set for Scottish waters through River Basin Management Planning. These objectives are based on ecological assessments and economic judgments. The plans cover all types</p>



Document	Key Messages/ Issues
	of water body, e.g., rivers, lochs, lakes, estuaries, coastal waters and groundwater.
Directive 2007/60/EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risks	Requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk.
Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration	This Directive establishes a regime which sets groundwater quality standards and introduces measures to prevent or limit inputs of pollutants into groundwater. The directive establishes quality criteria that takes account local characteristics and allows for further improvements to be made based on monitoring data and new scientific knowledge.
<i>National</i>	
NPPF, 2023 -	Paragraph 159 "... inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".
The Environment Act (2021)	The Environment Act, which became law in 2021, acts as the UK's new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.  Objectives for targets under consideration

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>• reduce pollution from agriculture, in particular phosphorus and nitrate</li> <li>• reduce pollution from wastewater, in particular phosphorus and nitrate</li> <li>• reduce water demand</li> <li>• improve the quality of habitat on land, including freshwater and coastal sites, expressed through the condition of our protected sites (SSSIs)</li> <li>• improve the overall status of species populations on land and in freshwaters</li> </ul>
<p>NN NPS (2014)- Paragraph 5.105</p>	<p>“... if there is no reasonably available site in Flood Zones 1 or 2, then national networks infrastructure projects can be located in Flood Zone 3, subject to the Exception Test. Both elements of the test will have to be passed for development to be consented...”</p>
<p>NN NPS (2014)- Paragraph 5.109</p>	<p>“Any project that is classified as ‘essential infrastructure’ and proposed to be located in Flood Zone 3a or 3b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Zone 3b should result in no net loss of floodplain storage and not impede water flows”.</p>
<p>NN NPS (2014)- Paragraph 5.224</p>	<p>“Activities that discharge to the water environment are subject to pollution control”</p>
<p>NN NPS (2014)- Paragraph 5.225</p>	<p>“... impacts on the water environment should be given more weight where a project would have adverse effects on the achievement of</p>



Document	Key Messages/ Issues
	the environmental objectives established under the Water Framework Directive”.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)- Goal 2 ‘Clean and plentiful water’	“Improve at least three quarters of our waters to be close to their natural state as soon as is practicable by: [...] Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water”.
<i>Regional</i>	
London Sustainable Drainage Action Plan	<p>The London Sustainable Drainage Action Plan addresses a specific need to promote the awareness, and the retrofitting, of sustainable drainage systems right across London. It contains a series of actions to make our drainage system work in a more natural way which will bring a wide range of benefits including:</p> <ul style="list-style-type: none"> <li>▪ steadily reducing flood risks by easing the burden on our drains and sewers</li> <li>▪ reducing pollution of our tributary rivers and streams</li> <li>▪ creating more pleasant landscapes, streets and settings for London’s buildings</li> <li>▪ providing opportunities to save water</li> <li>▪ providing opportunities for school activities and studies related to the water cycle</li> </ul>
Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure	The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs

Document	Key Messages/ Issues
	<p>should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> <li>■ Policy SI 5 Water infrastructure</li> <li>■ Policy SI 12 Flood risk management</li> <li>■ Policy SI 13 Sustainable drainage</li> <li>■ Policy SI 14 Waterways – strategic role</li> <li>■ Policy SI 15 Water transport</li> <li>■ Policy SI 16 Waterways – use and enjoyment</li> <li>■ Policy SI 17 Protecting and enhancing London’s waterways</li> </ul>
<i>Local</i>	
<p>AECOM, London Borough of Tower Hamlets Strategic Flood Risk Assessment, 2017</p>	<p>London Borough of Tower Hamlets Strategic Flood Risk Assessment (SFRA) identifies the spatial variation in flood risk across the borough thus allowing an area-wide comparison of future development sites with respect to flood risk considerations.</p>

**Table E-11 – Relevant Plans, Policies, strategies and Programmes – Air Quality**

Document	Key Messages/ Issues
<i>International</i>	
Ambient Air Quality Directive	The Ambient Air Quality Directive provides the current framework for the control of ambient concentrations of air pollution in the EU. The control of emissions from mobile sources, improving fuel quality and promoting and integrating environmental protection requirements into the transport and energy sector are part of these aims.
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>Objectives for targets under consideration</p> <ul style="list-style-type: none"> <li>• reducing the annual mean level of fine particulate matter (PM<sub>2.5</sub>) in ambient air (as required by the Environment Bill)</li> <li>• in the long-term, reducing population exposure to PM<sub>2.5</sub></li> </ul>
25 Year Environment Plan, HM Government (2018)	With regards to the transport sector, the 25 Year Environment Plan identifies four ‘early’ priorities through the ‘Future of Mobility Grand Challenge’. These include encouraging new modes of transport; addressing the challenges of moving from hydrocarbon to zero emission vehicles; and Preparing for a future of new mobility



Document	Key Messages/ Issues
	services, increased autonomy, journey-sharing and a blurring of the distinctions between private and public transport.
The Clean Growth Strategy, 2017	<p>This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e., deliver increased economic growth and decreased emissions.</p> <p>Key Policies and Proposals in the Strategy:</p> <ul style="list-style-type: none"> <li>■ Develop world leading Green Finance capabilities;</li> <li>■ Develop a package of measures to support businesses to improve their energy productivity, by at least 20 per cent by 2030;</li> <li>■ Improving the energy efficiency of our homes;</li> <li>■ Rolling out low carbon heating;</li> <li>■ Accelerating the shift to low carbon transport;</li> <li>■ Delivering clean, smart, flexible power emissions; and</li> <li>■ Enhancing the benefits and value of our natural resources.</li> </ul>
NN NPS (2014)- Paragraph 5.12	Accords air quality considerations substantial weight where, after taking into account mitigation, a scheme would lead to a significant air quality impact in relation to Environmental Impact Assessment (EIA) and/ or where they lead to deterioration in air quality in a zone/ agglomeration.
Clean Air Strategy 2019	Addresses action to reduce emissions from transport “as a significant source of emissions of air pollution”, in-particular oxides of nitrogen (NO <sub>x</sub> ) – which is responsible for high levels of NO <sub>2</sub> in ambient air, especially in urban areas - and particulate (PM <sub>10</sub> and PM <sub>2.5</sub> ) emissions.
<i>Regional</i>	

Document	Key Messages/ Issues
<p>Mayor of London, London Local Air Quality Management (LLAQM), 2019</p>	<p>The Mayor’s LLAQM framework is the statutory process used by local authorities to review and improve air quality within their areas. The new LLAQM made updates to:</p> <ul style="list-style-type: none"> <li>■ Ensure boroughs are taking ambitious action, which is properly co-ordinated at the regional level, and which supports Mayoral objectives including those set out in the London Environment Strategy;</li> <li>■ Ensure that London boroughs continue to work towards achievement of World Health Organisation safe limits for pollutants even when legal limits are met;</li> <li>■ Update information in the guidance documents to reflect new research, policies, and priorities; and</li> <li>■ Update Cleaner Air Borough Status (a recognition scheme for boroughs that was introduced under the previous Mayor) so that it is transparent and fair, now promotes continual improvement, and clearly aligns with new LLAQM priorities.</li> </ul> <p>As part of LLAQM, all London boroughs must submit Annual Status Reports (ASRs).</p>
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Chapter 9: Sustainable Infrastructure includes:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Policy SI 1 Improving air quality</li> </ul>
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> <li>■ London Plan</li> <li>■ Transport</li> <li>■ Housing</li> <li>■ Economic Development</li> <li>■ Culture</li> <li>■ Health Inequalities</li> </ul> <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> <li>■ Air quality. London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities</li> </ul>
<p><i>Local</i></p>	
<p>Tower Hamlets Council, London Borough of Tower Hamlets Air Quality Action Plan 2022 – 2027</p>	<p>This Air Quality Action Plan (AQAP) has been produced as part of our responsibility under London Local Air Quality Management. The AQAP outlines the action to improve air quality in the London Borough of Tower Hamlets (LBTH) between 2022 – 2027.</p>



Document	Key Messages/ Issues
	<p>Priorities:</p> <ul style="list-style-type: none"><li>■ Continue monitoring air pollutants and carrying out other core statutory duties to improve air quality within the Borough</li><li>■ Reducing emissions from developments and buildings</li><li>■ Increasing public health and awareness raising to reduce exposure to air pollution</li><li>■ Working with businesses in delivery servicing and freight to decrease air emissions</li><li>■ Reducing emission from Council fleet</li><li>■ Localised solutions such as expanding and improving green infrastructure, Low Emission Neighbourhoods (LENs) (subject to securing funding), replacing boilers and implementing insulation schemes in schools and Council properties, etc.</li><li>■ Improving cleaner transport within the Borough through transport and air quality policies, idling enforcement, car free days, pedestrianisation schemes projects, installation of electric vehicle charging points, and supporting walking and cycling.</li></ul>



**Table E-12 – Relevant Plans, Policies, strategies and Programmes – Climate Change and Greenhouse Gases**

Document	Key Messages/ Issues
<i>International</i>	
Kyoto Protocol to the UN Framework Convention on Climate Change (1992) Doha Amendment to the Kyoto Protocol (2012)	Developed countries commit themselves to reducing their collective emissions of six key greenhouse gases by at least 5%. Each country’s emissions target must be achieved by the period 2008-2012. Doha Amendment saw parties commit to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020.
The Paris Agreement, 2015	Aims to limit the global warming change to below 2°C above pre-industrial levels. However, countries aim to limit the increase to 1.5°C to reduce the impacts of global warming. The EU has committed to a binding target of a reduction of at least 40% in greenhouse gas emissions by 2030 compared to 1990
IEMA (2023) Practical steps for decarbonising local plans	<p>Toolkit to help close the gaps between climate action plans and the planning process, and to improve the plan’s evidence base. IEMA’s climate change and energy policy steering group has worked with IEMA members in the planning and infrastructure emissions fields to create a simple set of stages for local authorities to follow.</p> <ul style="list-style-type: none"> <li>▪ Stage one provides a clear understanding of baseline emissions and future carbon budgets.</li> <li>▪ Stage two shows simple steps for calculating emissions linked to alternative policy options.</li> <li>▪ Step three describes how the monitoring process feeds back into the review.</li> </ul>

Document	Key Messages/ Issues
	Critically, the toolkit shows how each of the stages interacts with the authority's climate action plan.
<i>National</i>	
NPPF, 2023	<p>Paragraph 154 of the NPPF states that “New development should be planned for in ways that:</p> <p>a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and</p> <p>b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the UK Government’s policy for national technical standards.”</p>
The Climate Change Act, 2008	<p>Improve carbon management and help the transition towards a low carbon economy in the UK.</p> <p>Demonstrate strong UK leadership internationally, showing the commitment to taking shared responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in 2009.</p> <p>Greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO<sub>2</sub> emissions of at least 26% by 2020, against a 1990 baseline.</p>

Document	Key Messages/ Issues
<p>NN NPS, 2014</p>	<p>Paragraph 4.38 of the NN NPS states that <i>“New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure.”</i></p> <p>The NN NPS also requires carbon impacts to be considered as part of the appraisal of scheme options, and an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. <i>It goes on to state that “it is very unlikely that the impact of a road project will, in isolation, affect the ability of UK Government to meet its carbon reduction plan targets.”</i></p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment, 2018</p>	<p>The 25 Year Environment Plan outlines the UK Government’s ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition.</p> <p>Mitigating and adapting to climate change:</p> <p>Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases. The UK Climate Change Act 2008 commits us to reducing total greenhouse gas emissions by at least 80 per cent by 2050 when compared to 1990 levels;</p> <p>Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century; and</p>

Document	Key Messages/ Issues
	Implementing a sustainable and effective second National Adaptation Programme.
UK Committee on Climate Change, Interim UK Carbon Budgets	<p>The UK has committed to an 80% reduction in its greenhouse gas emissions by 2050. In order to help meet this target, the UK Committee on Climate Change (CCC) has devised a series of interim UK “carbon budgets” as follows:</p> <ul style="list-style-type: none"> <li>■ 1st carbon budget (2008 to 2012): 23% reduction;</li> <li>■ 2nd carbon budget (2013 to 2017): 29% reduction;</li> <li>■ 3rd carbon budget (2018 to 2022): 35% reduction by 2020;</li> <li>■ 4th carbon budget (2023 to 2027): 50% reduction by 2025;</li> <li>■ 5th carbon budget (2028 to 2032): 57% reduction by 2030.</li> </ul>
25 Year Environment Plan, HM Government (2018)	Goal 7 of the 25 Year Environment Plan, ‘Mitigating and adapting to climate change’, is to “take all possible action to mitigate climate change, while adapting to reduce its impact” by “continuing to cut greenhouse gas emissions including from land use, land use change...” and “making sure that all policies, programmes and investment decisions consider the possible extent of climate change this century”.
<i>Regional</i>	
Mayor of London, London Environment Strategy, 2018	The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.

Document	Key Messages/ Issues
	<p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> <li>■ London Plan</li> <li>■ Transport</li> <li>■ Housing</li> <li>■ Economic Development</li> <li>■ Culture</li> <li>■ Health Inequalities</li> </ul> <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> <li>■ Adapting to climate change. London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought</li> <li>■ Climate change and energy. London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy</li> </ul>
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> <li>■ Policy SI 2 Minimising greenhouse gas emissions</li> </ul>



Document	Key Messages/ Issues
	<ul style="list-style-type: none"> <li>■ Policy SI 4 Managing heat risk</li> </ul>
<i>Local</i>	
Tower Hamlets Council, Net Zero Carbon Plan, 2020	<p>The borough council is implementing its Net Zero Carbon Plan which sets out their goals and commitment to tackling the climate emergency. Objectives of the plan:</p> <ul style="list-style-type: none"> <li>■ A Net Zero Carbon Council by 2025 – In March 2019, Tower Hamlets Council declared a climate emergency. The Council is now aiming to be Net Zero Carbon by 2025. This report shows that it is possible but that it will require decisive action starting now to reduce direct emissions by 75%. The residual emissions will have to be offset</li> <li>■ A Net Zero Carbon Borough by 2050 – This report also recommends that Tower Hamlets Council uses its powers, influence and leadership to put the Borough on the right track to achieve Net Zero Carbon by 2050 (or earlier if possible)</li> </ul>
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The council is commitment to be carbon neutral by 2025 and a carbon neutral borough by 2045. The commitments mean will reduce and offset the amount of carbon created as a council and borough partnership.</p> <p>‘Priority 6: A clean and green future’. Ambition is that cleanliness and air quality improve, emissions and noise</p>



Document	Key Messages/ Issues
	nuisance reduce, and everybody benefits from parks and more trees.

**Table E-13 – Relevant Plans, Policies, strategies and Programmes – Material Assets**

Document	Key Messages/ Issues
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK's new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>Objectives for targets under consideration</p> <ul style="list-style-type: none"> <li>■ increase resource productivity</li> <li>■ reduce the volume of 'residual' waste we generate</li> </ul>
NPPF, 2023	<p>Paragraph 174 states: "... <i>contribute to and enhance the natural and local environment by:</i></p> <ul style="list-style-type: none"> <li>■ Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils...;</li> <li>■ Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability...; and</li> <li>■ Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate".</li> </ul> <p>Paragraph 17 also seeks to facilitate the sustainable use of minerals.</p>

Document	Key Messages/ Issues
	<p>Paragraph 210 encourages so far as practicable, planning policies should <i>“take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously”</i>.</p> <p>Paragraph 183 states: <i>“Planning policies and decisions should ensure that:</i></p> <ul style="list-style-type: none"> <li>(a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)</li> <li>(b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</li> <li>(c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.</li> </ul>
<p>NN NPS (2014)</p>	<p>Paragraph 5.117 requires land stability to be considered in respect of new development. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability.</p> <p>Paragraph 5.168 states <i>“Applicants should also identify any effects, and seek to minimise impacts, on soil quality, considering</i></p>

Document	Key Messages/ Issues
	<p><i>any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this”.</i></p> <p>Paragraph 5.19 states “<i>Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout and use of materials) in both design and construction should be presented”.</i></p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment (2018)</p>	<p>Goal 5 ‘Clean and plentiful water’ involves using resources from nature more sustainably and efficiently. The plan states: “<i>Improve our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches”.</i></p>
<p>Our Waste, Our Resources: A Strategy for England (Dec 2018)</p>	<p>Sets out how the UK Government aims to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.</p>
<p><i>Regional</i></p>	
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social</p>

Document	Key Messages/ Issues
	<p>infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> <li>■ Policy SI 3 Energy infrastructure</li> <li>■ Policy SI 7 Reducing waste and supporting the circular economy</li> <li>■ Policy SI 8 Waste capacity and net waste self-sufficiency</li> <li>■ Policy SI 9 Safeguarded waste sites</li> <li>■ Policy SI 10 Aggregates</li> <li>■ Policy SI 11 Hydraulic fracturing (Fracking)</li> </ul>
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> <li>■ London Plan</li> <li>■ Transport</li> <li>■ Housing</li> <li>■ Economic Development</li> <li>■ Culture</li> <li>■ Health Inequalities</li> </ul>

Document	Key Messages/ Issues
	<p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> <li>■ Waste. London will be a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of London’s municipal waste will be recycled</li> </ul> <p>Chapter 7 sets out policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining.</p>
<i>Local</i>	
<p>Tower Hamlets Council, ‘Don’t let our future go to waste’ Waste management strategy 2018-30</p>	<p>The six key priorities framing the waste management strategy are intended to guide a series of policies and targets to help the council achieve better services for residents, leading to a cleaner, greener Tower Hamlets. These priorities are set to remain relevant until 2030 and will be reviewed every four years alongside the reduction and recycling plan. This will allow any key legislative or policy changes to be incorporated into the strategy if necessary. The waste management strategy sets out six priorities to guide the way the council develops and improves work over the next 12 years:</p> <ul style="list-style-type: none"> <li>■ Collaboration at the heart of change – The more we work together, the more waste we can reduce, reuse and recycle.</li> <li>■ Supporting people to love their neighbourhood – We will design services with our users in mind to encourage everyone to love their neighbourhood and take responsibility for their own waste</li> <li>■ Supporting people to reduce, reuse, and recycle – We will encourage and enable everyone to follow the three R’s in their daily lives to lower our environmental impact.</li> </ul>



Document	Key Messages/ Issues
	<ul style="list-style-type: none"><li>■ Making waste a resource – We will provide opportunities for our service users to keep materials in use rather than throwing them away.</li><li>■ Reducing carbon and improving air quality – We will help improve local air quality by cutting emissions from our waste management activities.</li><li>■ Building our green economy – We will capitalise on ‘green opportunities’ for our residents and businesses where possible.</li></ul>
Tower Hamlets Council, Reuse, Recycling & Waste SPD, 2021	The Tower Hamlets Reuse, Recycling and Waste SPD which sets out guidance for developers on how waste management should be addressed in proposals for new residential and mixed-use development. The SPD covers the entire borough and aims to re-examine and improve the way in which waste is produced and managed. The Reuse, Recycle and Waste SPD was prepared under Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

# Appendix F

## Assessment of Draft Policies





# Appendix G

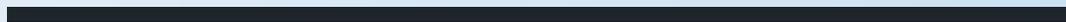
## Assessment of Sites and Site Alternatives





# Appendix H

## Equalities Impact Assessment





# Appendix I

## Health Impact Assessment







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London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

Appendix F - Assessment of Policies



London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

## **Appendix F - Assessment of Policies**

**Type of document (version) Public**

**Project no. 70103752**

**Our Ref. No. 001**

**Date: June 2024**

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# Quality control

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<b>Issue/revision</b>	<b>First issue</b>	<b>Revision 1</b>	<b>Revision 2</b>	<b>Revision 3</b>
Remarks	Draft for LBTH	Final for Regulation 18	Draft for Regulation 19	Final for Regulation 19
Date	September 2023	October 2023	May 2024	June 2024
Prepared by	Charlotte Town	Emily Astins Emily Bonnett	Charlotte Town	Charlotte Town
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Signature				
Project number	70103752	70103752	70103752	70103752

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# 1 Introduction

1.1.1. This Appendix sets out the detailed findings of the assessment of the draft policies.

1.1.2. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 1-1** below. The performance of the draft policies against each IIA objective and **Tables 2-1 to 2-10** show the summary of significant effects based on each IIA objective.

**Table 1-1 – Significance of Effect**

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local / regional / national)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

## 2 Assessment of Draft Policies

### 2.1 Delivering the Local Plan

The assessment of the Delivering the Local Plan Policies are presented in **Table 2-1** below.

**Table 2-1 – Delivering the Local Plan**

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	++	L	D	L	I	P	LT	<p>Policy DV1 (areas of growth and opportunity within Tower Hamlets) requires development to provide community infrastructure, and upgrade utilities infrastructure. This will provide improved infrastructure for both the current and future populations.</p> <p>Similarly, Policy DV7 (utilities and digital connectivity) ensures sufficient infrastructure, including electricity water, sewage, and digital infrastructure, for current and future populations within development proposals.</p> <p>Policy DV6 (Social Value) aims to maximise the delivery of social value to positively contribute community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This can play a pivotal role in advancing equality.</p> <p>Similarly, Policy DV5 (Developer contributions) may also help to contribute to community project and facilities through Community Infrastructure Levy (CIL) payments.</p> <p>Policy DV8 (Site allocations) requires developers to discuss changes to social infrastructure and any alternative requirements as they arise on particular sites.</p>
<b>I/A2: Human Health</b>	++	M	D	R	I	P	LT	<p>Policy DV1 provides new community infrastructure, including health centres and leisure facilities. This improves healthcare provision and encourages physical activity amongst the population.</p> <p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes contributing to the development of healthy environments, encouraging physical activity and promoting good mental and physical wellbeing.</p> <p>Policy DV3 (healthy communities) requires developments to provide healthy environments for physical and mental wellbeing. This also includes the requirement for major developments to undertake a rapid health impact assessment. This is likely to result in positive developments for health and physical activity, resulting in improvements to physical and mental wellbeing amongst residents of the borough.</p> <p>Policy DV7 (utilities and digital connectivity) provides improvements to broadband infrastructure. This is likely to improve mental well-being for isolated communities.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy DV8 (Site allocations) ensures that required infrastructure is delivered on earlier phases of development as far as possible. This is likely to result in positive developments for health as access to services will be prioritised. The policy also improves health through the publicly accessible open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.
<b>IIA3: Economy &amp; Town Centres</b>	++	M	D	R	I	P	LT	<p>Policy DV1 directs development proposals towards the borough's opportunity areas within the City Fringe, Poplar Riverside, Isle of Dogs and South Poplar. This is likely to boost economic investment and growth within these areas. The policy also promotes a thriving economy through supporting development within the borough's strategic industrial locations, local industrial locations, and non-designated industrial sites. There is also focus upon ensuring town centres provide a range of uses and are accessible.</p> <p>Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This could include opportunities to support local businesses and enterprises.</p>
<b>IIA4: Employment &amp; Skills</b>	++	M	D	R	I	P	LT	<p>Policy DV1 protects and enhances employment locations within the borough, as well as supporting a mix of employment opportunities across the borough. This also includes promoting affordable work space, to encourage a diverse range of employment opportunities.</p> <p>Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This could include opportunities to support local enterprises, businesses and training opportunities.</p>
<b>IIA5: Housing</b>	+	M	D	R	I	P	LT	Policy DV5 states that development proposals will be required to enter into Section 106 agreements to provide affordable housing. It also states that as vacant building credit has the potential to adversely impact the borough's ability to meet the affordable housing target, it will not apply and act as an exemption from its application in the borough.
<b>IIA6: Crime &amp; Safety</b>	+	M	D	L	R	T	MT	Policy DV2 aims to empower the local community and deliver healthier, more inclusive, safer and cleaner spaces throughout the borough. Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. An example provided by the policy includes demonstrating spatial and environmental improvement works that improve health and well-being, adopt gender inclusive design and create safer spaces.
<b>IIA7: Sustainable Transport</b>	+	M	D	R	I	P	LT	<p>Policy DV1 directs developments towards locations with good public and active travel links. This is likely to encourage a modal shift away from private vehicles and encourage utilisation of public and active travel. This is also encouraged through the development of green grid projects.</p> <p>Policy DV2 includes the support for developments where they contribute towards a clean and green future. This includes delivering social and transport infrastructure improvements.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A8: Accessibility</b>	++	M	D	R	I	P	LT	<p>Policy DV1 directs developments towards locations with good public and active travel links. It also aims to improve the transport network and wider strategic and local connections. This is likely to encourage a modal shift away from private vehicles and encourage utilisation of public and active travel and support greater accessibility to the borough's services.</p> <p>Policy DV1 provides new community infrastructure, including health centres and leisure facilities. This will provide greater access to facilities and services within the borough.</p>
<b>I/A9: Biodiversity &amp; Natural Capital</b>	+	M	D	R	I	P	LT	<p>Policy DV1 supports Green Grid projects which will deliver appealing walking routes (such as the Lea River Park and Whitechapel Green Spine) and associated green infrastructure across the borough. This will help to provide new green infrastructure and a variety of new habitats.</p> <p>Policy DV4 (Planning and construction of new development) requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which includes consideration for urban ecology.</p> <p>Policy DV8 (Site allocations) require development proposals on site allocations to provide new publicly accessible open space of at least 0.4ha, and where strategic publicly accessible open spaces are required, provision of at least one hectare of contiguous open space. This can contribute to habitat creation and will be of importance to habitat connectivity, assisting statutory requirements to retain and enhance biodiversity.</p>
<b>I/A10: Landscape &amp; Townscape</b>	+	L	D	L	R/I	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes preserving and enhancing the character and setting of the area.</p>
<b>I/A11: Historic Environment</b>	+	L	D	L	R	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes not resulting in unacceptable impacts on the historic environment.</p> <p>Policy DV4 requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which includes consideration for archaeology and built heritage.</p>
<b>I/A12: Flooding</b>	++	L	D	L	I	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes mitigating flood risk.</p> <p>Policy DV4 requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which include flooding.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy DV8 includes the requirement for development in close proximity to water courses to incorporate buffer zones to support flood risk management, mitigating flood risk.
I/A13: Water Quality	+	L	D	L	R	T	MT	Policy DV4 requires all major development proposals should sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which include water pollution.
I/A14: Air Quality	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes reducing the impacts of poor air quality. Additionally, zero carbon construction is likely to contribute to reduced emissions and minimisation of poor air quality associated with construction.
I/A15: Climate Change & Resilience	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes zero carbon construction, low carbon energy and heat production, this contributes to reducing the embodied carbon within developments.  Policy DV7 (utilities and digital connectivity) supports decarbonised heat networks and net zero carbon emissions for energy systems. This reduces the waste heat from developments.
I/A16: GHG Emissions	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes utilising local goods and services, supporting low carbon energy and heat production, zero carbon construction, reducing GHG emissions.  Policy DV8 (Site allocations) require development proposals on site allocations to provide new publicly accessible open space of at least 0.4ha, and where strategic publicly accessible open spaces are required, provision of at least one hectare of contiguous open space. The addition of open space can improve climate resilience and help to reduce the Urban Heat Island (UHI) effect.
I/A17: Waste	+	L	D	L	R	P	LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes utilising circular economy principles and reusing and recycling of buildings and resources.
I/A18: Efficient use of Land	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Cumulative/ Synergistic Effects	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>These Policies are likely to have positive in-combination effects with the majority of policies within the NLP, most notably Community Infrastructure, Town Centres and Inclusive Economy and Good Growth Policies.</li> </ul> <p><b>Inter-project:</b></p> <ul style="list-style-type: none"> <li>The polices are expected to have concordant outcomes with the associated London Plan Policies and will resultantly lead to positive cumulative effect for LBTH.</li> </ul>							

<b>Policy Grouping</b>	Delivering the Local Plan							
<b>Policy Codes</b>	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<ul style="list-style-type: none"> <li>The London Plan policy D1 seeks to understand the existing context of the borough in order to inform the areas capacity and needs for growth. In doing so, the policy ensures that development will be inclusive. This aligns with policy DV2 from the NLP which seeks to contribute towards inclusive environments throughout the borough.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	No mitigation measures have been outlined for these policies. Mitigations are likely to be based on site specific information once development sites have come forward.							
<b>HIA and EqIA Findings/ considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>Mitigations are likely to be based on site specific information once development sites have come forward.</li> <li>New and improved facilities will likely be accessible and therefore beneficial to all borough residents.</li> <li>Consideration of social value added will ensure community, culture and diversity are upheld through development.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>The Delivering the local plan policies outlined set out a holistic approach to the development of the NLP, and as such, are anticipated to bring about a high degree of positive effect across numerous social groups.</li> <li>By ensuring developers maximise contributions to the delivery of affordable housing, a greater proportion of the borough's population will be positioned to access housing.</li> <li>Social value contributions also include the adoption of gender inclusive design and creation of safer spaces, which will be of particular benefit to women and girls.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income.</li> <li>There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities.</li> <li>The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile.</li> <li>LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness</li> <li>There is a need to provide more greenspaces and high-quality public realm which can provide social spaces</li> </ul>							
<b>Recommendations</b>	Policy DV6 could incorporate community engagement within the policy. It is implied within the supporting text but the important role it plays in adding social value to new developments isn't overly clear.							

## 2.2 Homes for our Community

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-2** below.

**Table 2-2 – Homes for Our Community Policies Assessment**

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	<p>The policies aim to provide an appropriate mix of different sized homes, specialist and supported living, shared living and the protection of gypsy and traveller sites will help to reduce inequalities with access to housing, particularly for those in the community that are most vulnerable.</p> <p>Policy HF1 (Meeting housing needs) aims to prioritise specific groups including families with children, older people, disabled and vulnerable, key workers and service families, students and gypsies and travellers. In addition, the policy supports estate regeneration schemes that deliver homes across all tenures and provide improved social facilities, areas of high quality and multifunctional public realm and enhanced environmental amenity.</p> <p>Policy HF2 (Affordable housing and housing mix) requires development proposals to optimise the delivery of affordable housing, with the expectation of meeting the target of 50% affordable housing. The policy supports the reduction of poverty and inequalities in the borough and facilitates improvements in access to housing for low income groups.</p> <p>Policy HF9 (Housing Standards and Quality) also states that affordable housing should not be externally distinguishable in quality from private housing, which will ensure that low income groups will not be discriminated against. The policy also includes measures for wider accessibility within developments, ensuring inclusive access for all residents.</p>
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	<p>The policies aim to provide an appropriate mix of different sized homes, specialist and supported living, shared living and the protection of gypsy and traveller sites. As housing is a social determinant of health, significant positive effects will also result.</p> <p>Policy HF4 (Supported and specialist housing and housing for older people) aims to seek opportunities to integrate the development into the wider area should also be explored to encourage a sense of belonging (especially among people from different generations) as well as to protect against the health impacts of loneliness and isolation.</p>
<b>IIA3: Economy &amp; Town Centres</b>	++	M	I	R	I	P	LT	<p>The provision of new housing will benefit the local economy as the connectivity between employment centres and housing markets will be improved, and spending within the local communities will increase.</p>

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA4: Employment &amp; Skills</b>	+	H	D	R	R	T	MT	All policies support the provision of a variety of new housing, which will indirectly provide employment opportunities. The construction and maintenance of these housing developments will likely provide high numbers of jobs.
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	All policies will help to deliver at least 52,095 (+ London Legacy Development Corporation (LLDC)) new homes across the borough between 2023-2038, which exceeds the target of 34,730 new homes between 2019/20 and 2028/29. These will ensure a variety of housing will be delivered to meet the needs of all residents inclusively.  In addition to the delivery of new housing, Policy HF3 (Protection of existing housing) aims to protect existing housing, particularly ensuring that the supply of self-contained homes and in particular family-sized homes is maintained.  Policy HF7 and HF8 require development proposals for large-scale purpose-built shared living spaces and houses in multiple occupation (HMOs) to provide a cash-in-lieu contribution to the provision of affordable housing elsewhere in the borough. A monetary solution will be unlikely to address the issue of spatial availability in the borough and so the provision of affordable housing may be compromised in some locations by this suggestion.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	T	MT	Policy HF5 (Gypsy and traveller accommodation) the proposed site is suitable for housing and in an accessible, safe location. This will help to ensure the safety of this often marginalised group. Policy HF9 (Housing Standards and Quality) states that any community amenity space associated with major developments must be overlooked by habitable rooms to ensure safety and surveillance. This may help to deter crime and improve overall feeling of safety.
<b>IIA7: Sustainable Transport</b>	+	L	I	L	I	P	LT	Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected and in close proximity to public transport. This will help to encourage the use sustainable transport modes and reduce private car use.
<b>IIA8: Accessibility</b>	+	L	I	L	I	P	LT	Policy HF1 (Meeting housing needs) will help to ensure that where possible development will be in highly accessible locations along transport corridors. Similarly, Policy HF5 (Gypsy and traveller accommodation) states that development proposals must demonstrate that they are accessible in terms of location and individual mobility needs. This will help to ensure older people can remain independent. Policy HF8 (Housing with shared facilities (houses in multiple occupation)) states that developments should be located are located in an area of high transport accessibility.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	H	D/I	R	R/I	P/T	ST/L T	Depending upon the location of sites, there may also be temporary disturbances to habitats and species during construction. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. This could result in increases in biodiversity and natural capital through the provision of habitats and green infrastructure.

Policy Grouping		Homes for our Community						
Policy Codes		HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/L T	There is potential for housing developments to detract from the landscape and townscape, through land take and poor design. Depending upon the location of sites, there may also be temporary loss to the setting and tranquillity of some areas of the borough which have high landscape and townscape values, from dust, construction traffic, noise and vibration. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. If sensitively designed this could help to improve the setting of the local landscape and townscape adding to its value.
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>There is potential for housing developments to result in the loss of heritage assets (designated, non designated and buried archaeology), through land take as well as possible degradation from poor design. Depending upon the location of sites, there may also be temporary disturbances to the setting of heritage assets during construction from dust, construction traffic and noise and vibration. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. If sensitively designed this could help to improve the setting of the local historic environment adding to its value.</p> <p>Policy HF5 (Gypsy and traveller accommodation) is the only policy that ensures that developments employ high quality design and are sympathetic to local character and heritage. It is not clear whether other sites will also have the same level of consideration to the historic environment. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented, though it is expected that they will be single storey in nature and should not impact greatly on the setting of neighbouring heritage assets.</p>
I/A12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	Policy HF5 (Gypsy and traveller accommodation) is the only policy that ensures that developments are located away from areas of high flood risk (flood zone 3). It is not clear whether other sites which may come forward as a result of these policies will have the same considerations. Urban intensification and additional housing in the borough could increased flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	M	D/I	R	R/I	P/T	ST/ LT	Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected to public transport. This will help to encourage the use sustainable transport modes and reduce private car use. Allowing residents to live more locally may also reduce emissions and improve overall air quality. The inclusion of parks and green spaces as per Policy HF1 will also help to improve air quality. However, construction of housing is likely to result in temporary worsening of air quality during construction.

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA15: Climate Change &amp; Resilience</b>	+	L	I	L	I	P	LT	<p>Policy HF1 (Meeting housing needs) aims to create sustainable places and quality living environments, however, it is not clear whether this will ensure climate resilient design.</p> <p>Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected to public transport. This will help to encourage the use sustainable transport modes and reduce private car use. Allowing residents to live more locally may also reduce emissions and improve. The inclusion of parks and green spaces as per Policy HF1 (Meeting housing needs) will also help to reduce levels of overheating within the borough.</p>
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The development of housing is likely to result in significant levels of embodied carbon. Policy HF1 (Meeting housing needs) aims to create sustainable places and quality living environments, however, it is not clear whether this will include measure that will reduce GHG emissions and include renewable energy generation. As many of these measures will be determined by scheme level design, uncertain effects have been identified.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Housing development proposals which will come forward as a result of these policies are likely to be resource intensive and could generate a significant amount of construction waste. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
<b>IIA18: Efficient use of Land</b>	+/-	H	D	R	I	P	LT	As stated in Policy HF1 (Meeting housing needs), although housing growth will be primarily focused in the locations which may result in the repurposing of some land, the borough's limited area requires optimising delivery capacity where opportunities arise, which will be achieved by the regeneration of previously developed land, the intensification of the built form in opportunity areas.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There is potential for negative cumulative and synergistic effects on biodiversity, landscape and townscape, historic environment, air quality, GHGs, flooding and efficient use land if multiple developments were to come forward. These may conflict with policies PS6, PS7, PS8, BO1, BO2, CG1 and CG9.</li> <li>Cumulative increases in hardstanding which surfaces may also increase flood risk within the borough.</li> <li>Multiple housing developments are also likely to be resource intensive and significantly increase levels of embodied carbon as well as emissions associated with construction.</li> <li>The delivery of housing is likely to have positive effects in combination with policy DV1 and DV2.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>Positive cumulative effects are expected to arise from the London plans policy on housing quality (D6) and the NLPs housing standards and quality policy (HF9). Housing that is fit for purpose is at the forefront of both polices, with HF9 setting out the requirements for space and accessibility standards as provided by the London Plan itself. Included in this is requirements for private internal space, access to external open space, and adequate daylight and privacy. housing in the NLP aligns with policy D7 in the London Plan. Both seek to provide housing that is genuinely suitable for London's diverse population, including at least 10% if dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. The positive cumulative effects of these policies will aid the borough population in need of specialist housing including the elderly and disabled groups.</li> <li>A strong focus on play and recreational space across both the London Plan and NLP will drive positive cumulative effects. The shared aim for residential developments to incorporate good-quality, accessible play provision within policy HF1 and S4 will generate positive effects for the greenspace accessibility of residents throughout the borough.</li> </ul>							

<b>Policy Grouping</b>	Homes for our Community							
<b>Policy Codes</b>	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<ul style="list-style-type: none"> <li>There is the potential for negative cumulative effects to arise on housing in combination with London Plan 2021 policies. London Plan Policy SD5 does not promote the provision of off-site affordable housing or cash-in-lieu contributions, unless under exceptional circumstances; conflicting with NLP Policies (HF7 and HF8).</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	<ul style="list-style-type: none"> <li>Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible.</li> <li>Mitigation for IIA11 is likely to be offered by proposed Policy PS6 which aims to reduce the potential impacts on the historic environment.</li> <li>Mitigation for IIA12 is likely to be offered by proposed Policy CG6 which aims to manage flood risk from all sources.</li> </ul>							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>The emphasis on affordable family sized housing with a view to combat overcrowding in the borough is also beneficial to families with children.</li> <li>Estate regeneration should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.</li> <li>The provision of specialist housing to offer supported living to those with additional needs will support a range of protected characteristics in the borough.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>The policies are anticipated to bring about a high degree of positive effect across numerous social groups.</li> <li>Social cohesion is highly supported by this theme. Regeneration as well as new provision is required to provide residents with a high-quality built environment, including access to community facilities.</li> <li>The requirement of development proposals to maximise the delivery of affordable homes under this theme will be especially beneficial to the health and wellbeing of low-income groups who are reliant on affordable housing.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>There is significant need for affordable properties to buy and rent, however, rising costs of living and above average house prices are affecting the number of residents able to afford to buy.</li> <li>There are significant levels of overcrowding in the borough</li> <li>The Covid-19 pandemic and rising cost of living is increasing levels of homelessness.</li> <li>The lack of affordable housing means that young people and/or lower income groups are missing out.</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>It should be noted that the Decent Home Standard is currently applicable to the social rented sector whilst the Decent Homes Standard in the private rented sector is undergoing consultation.</li> <li>More information could be provided on what the policies mean by 'sustainable' residential development i.e., does this include renewable energy regeneration, use of sustainable materials, well located to sustainable transport etc.</li> <li>Policy HF5 (Gypsy and traveller accommodation) is the only policy that makes ensures that developments employ high quality design and is sympathetic to local character and heritage - this should also be included in Policy HF1.</li> </ul>							

## 2.3 Clean, Green Future

The assessment of the Clean, Green Future Policies are presented in **Table 2-3** below.

**Table 2-3 – Clean, Green Future Policies Assessment**

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	+	L	I	R	R	P	LT	The Clean and Green Future policies will help to provide adaptation and mitigation measures which will support the borough's population both now and in the future. Provision energy efficient buildings (CG2 Low energy buildings, CG3: Low carbon energy and heating) and retrofitting (CG4 Embodied carbon, circular economy and retrofit) will help to support better quality housing stock and present energy/ cost savings for residents.
<b>IIA2: Human Health</b>	++	L	D/I	L	R	P	LT	Provision energy efficient buildings (CG2 Low energy buildings, CG3 Low carbon energy and heating) and retrofitting (CG4 Embodied carbon, circular economy and retrofit) will help to improve residents' health by reducing exposure to cold and air pollutants, as well as overheating within developments. Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.  Policy CG10 (noise and vibration) contributes to indirect positive effects on wellbeing through a reduction in noise within Tower Hamlets. Reductions in noise reduce the nuisance to residents, improving mental wellbeing.  Policy CG11 (contaminated land and storage of hazardous substances) also acknowledges the risks that contaminated land poses to human health. This policy includes remediation measures for contaminated land and restrictions to hazardous substance use, preserving human health.
<b>IIA3: Economy &amp; Town Centres</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA4: Employment &amp; Skills</b>	+	L	I	L	R	T	MT	Design requirements as part of the Clean and Green policies could indirectly result in job opportunities particularly within the construction and renewable energy sectors.
<b>IIA5: Housing</b>	+	L	I	L	I	P	LT	Generally, policies within Clean and Green Future will indirectly contribute to improved housing quality within the borough, through higher quality building standards during construction, including through additional noise reduction measures, heating measures and climate resilience measures.
<b>IIA6: Crime &amp; Safety</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA7: Sustainable Transport</b>	+	L	D	R	R	P	MT	Policy CG9 (air quality) outlines the promotion on low and zero emissions transport. The supporting policy text also includes the encouragement of sustainable movement patterns, this is likely to include the use of public and active transport modes. Additionally, the policy promotes the use of electric vehicles.
<b>IIA8: Accessibility</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A9: Biodiversity &amp; Natural Capital</b>	++	L	I	L	R	P	MT	<p>Policy CG9 (air quality) contributes to indirect positive effects upon biodiversity through improvements to air quality, improving the environment for species and habitats. The policy also includes utilising nature-based solutions to reduce air pollution. This will also contribute to increasing the biodiversity within the borough as well as protecting existing habitats from the adverse effects of air pollution.</p> <p>Additionally, Policy CG10 (noise and vibration) includes measures to minimise disturbance from new construction, this is likely to have minor positive indirect effects on local biodiversity.</p>
<b>I/A10: Landscape &amp; Townscape</b>	+	L	I	L	R	P	MT	<p>Policy CG6 aims to include nature-based drainage systems and planted landscapes, which in addition to natural flood they can provide positive landscape features within the borough.</p> <p>Policies CG9 and CG10 encourages developments which will mitigate and improve poor air quality and reduce exposure to noise and vibration. Both noise and air pollution can contribute to reductions in tranquillity and the setting of townscapes and landscapes.</p>
<b>I/A11: Historic Environment</b>	+	L	I	L	R	P	MT	<p>The improvements to air quality outlined in Policy CG9 (air quality) contribute to indirect positive effects upon the historic environment as poor air quality contributes to the degradation of heritage assets. Therefore, improving air quality is likely to reduce degradation of assets within Tower Hamlets.</p>
<b>I/A12: Flooding</b>	++	M	D	R	I	P	LT	<p>Policy CG6 (flood risk) within Clean and Green Future addresses flood risk within the borough and sets out the requirements for developments that may occur within flood zones, including flood risk assessments and the restriction of highly vulnerable uses within flood zone 3a and 3b.</p> <p>The policy also sets out requirements for developments to include flood risk mitigation measures, improving resilience in flood events.</p> <p>Policy CG7 (sustainable drainage) also contributes to reducing flood risk through the implementation of SuDS and greenfield run-off rates, as well as reducing surface water run-off.</p>
<b>I/A13: Water Quality</b>	++	L	I	R	R	P	MT	<p>Policy CG8 requires development proposals to seek to reduce the pressure on the fresh and wastewater systems through reducing demand and increasing water efficiency. Conserving water can help to reduce the risk of environmental pollution, improve water quality and also save energy.</p> <p>Inclusion of SuDs as per CG7 can also help to improve water quality, as they mimic natural drainage regimes and reducing the transport of pollution to the water environment. This policy also supports proposals for zero discharge developments.</p>
<b>I/A14: Air Quality</b>	++	M	D	R	R/I	P	MT/LT	<p>Policy CG9 (air quality) addresses the poor air quality within the borough and the need for developments to mitigate and improve air quality, including promoting low or zero emission transport and reducing vehicle reliance. This is likely to contribute to improvements to air quality within the borough.</p>

<b>Policy Grouping</b>	Clean and Green Future							
<b>Policy Codes</b>	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA15: Climate Change &amp; Resilience</b>	++	M	D	R	I	P	LT	All policies within Clean and Green Future contribute to improving the climate resilience within the borough, particularly CG1 (Mitigating and adapting to a changing climate), CG5 (overheating), CG6 (which acknowledges the impact of climate change on flood risk). Climate change is likely to result in increased heating and rainfall events, therefore these policies increase the resilience to this through prevention of overheating and the consideration of flood risk within developments, including the implementation of SuDS.
<b>IIA16: GHG Emissions</b>	++	M	D/I	L	I	P	LT	The majority of policies within Clean and Green Future contribute to reducing GHG emissions through the reduction in energy usage, and vehicle reliance. Policy CG3 (low carbon energy and heating) also contributes to positive effects due to reductions in fossil fuel usage. Policy CG4 also contributes to reductions in embodied carbon.
<b>IIA17: Waste</b>	++	L	D	L	R	P	MT	Policy CG4 will require all major development proposals to demonstrate how waste will be minimised in the design and construction of the building, through reuse of materials on-site or ensuring new materials are sustainably sourced and low impact. The policy also encourages circular economy approaches within design and construction.  Policy CG1 aims to support development proposals which minimise the use of natural resources, by promoting more efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building.
<b>IIA18: Efficient use of Land and Resources</b>	++	L	D	R	I	P	LT	Policy CG11 (contaminated land and storage of hazardous substances) outlines the requirements to remediate contaminated land. This is likely to improve the quality of land within Tower Hamlets and contribute to the utilisation of brownfield land. Policy CG1 aims to support development proposals which minimise the use of natural resources, by promoting more efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There are potential positive cumulative effects upon air quality, human health, housing, and climate change in conjunction with other policies. This is likely to result in improved air quality, and improvements to housing standards within the borough.</li> <li>There are also potential positive cumulative improvements to biodiversity, in conjunction with Biodiversity and Open Space policies.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>Positive cumulative effects are expected from the overlapping requirements of the Clean, Green Future policies and the London Plan Policy SD1 on Opportunity Areas. Opportunity Areas are identified by the London Plan as significant locations with development capacity to accommodate housing, infrastructure and commercial development. The identification of such areas and the significant effect they have the potential to enact allows for the promotion of clean green principles in their development in order to support sustainability in the borough. This includes the development of brownfield sites in order to make the best use of land available.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	No mitigation or enhancement measures have been identified for these policies.							

<b>Policy Grouping</b>	Clean and Green Future							
<b>Policy Codes</b>	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>• Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>• In general, Clean Green Future results in positive impacts upon health determinants. There are a number of resulting beneficial health effects, particularly upon older people, infants, children and young people including care leavers, people with long term health conditions and low-income groups.</li> </ul>							
<b>IIA Issues addressed</b>	<ul style="list-style-type: none"> <li>• Increases in light, air, and noise pollution from increasing development in the borough</li> <li>• Frequent heat episodes as a result of climate change can contribute to the worsening of air quality</li> <li>• Climate change is likely to increase the occurrence of flooding from all sources</li> <li>• The impacts of the UHI generated in will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households</li> <li>• There is the need to reduce GHG emissions of new infrastructure and housing</li> <li>• There is a need to ensure climate resilience of the infrastructure in LBTH</li> <li>• Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the already stressed capacity of sewer systems</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• Policy CG4 Part 6 could be clearer on retrofitting proposals as it is not clear what developments these actually apply to - are these only applied to those undergoing redevelopment or applied to all existing housing stock?</li> <li>• Policy CG6 Part 8 could be reworded to '<i>Nature based solutions such as natural drainage systems and planted landscapes...</i>'</li> <li>• Policy CG9 could benefit from including the promotion of public or active travel modes within the policy, rather than just stating electric vehicles or sustainable movement patterns.</li> </ul>							

## 2.4 People, Places and Spaces

The assessment of the People, Places and Spaces Policies are presented in **Table 2-4** below.

**Table 2-4 – People, Places and Space Policies Assessment**

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	M	D	R	I	P	LT	<p>Policies within People Places and Spaces contribute to significant positive effects upon IIA1. PS1 (Design and Infrastructure Led Approach to Development) results in positive effects on communities as the policy supports the borough's growing population. Additionally, the policy outlines community engagement measures to ensure development suits community needs, and gender inclusive design.</p> <p>Policy PS5 (creating inclusive places) results in positive effects through improvements to equalities, ensuring all genders are able to access community spaces equally.</p> <p>Additionally, Policy PS4 (Attractive Streets, Spaces, and Public Realm) provides a range of public spaces for community use within developments. This improves the local facilities available for growing communities in the borough.</p>
<b>IIA2: Human Health</b>	++	M	D/I	R	I	P	LT	<p>Policy PS2 (tall buildings) indirectly improves health through the communal open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.</p> <p>Policy PS3 (Securing Design Quality) aims to ensure that developments do not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution noise pollution, or odours. All of these aspects can have harmful effects on human health, therefore reducing harmful impacts will have positive effects on the health of neighbouring populations. Additionally, the policy ensures developments consider the health and wellbeing of all users, including vulnerable people, throughout the design process. This further aids in reducing harmful impacts of development.</p> <p>Policy PS5 (creating inclusive places) includes measures for well-designed open spaces, which are accessible to all genders. This is likely to benefit health through reducing isolation of genders, for example mothers, and provide space for socialisation and activity outside, improving physical and mental health.</p>
<b>IIA3: Economy &amp; Town Centres</b>	+	L	D	L	R	P	MT	<p>Policy PS9 (shopfronts) outlines the need for active shopfronts which will help to improve the economic diversity within the borough and encourage multi-use shopfronts, building the local economy. This is also reinforced by a number of other policies within the grouping.</p>
<b>IIA4: Employment &amp; Skills</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA5: Housing</b>	+	L	D	R	I	P	LT	<p>Policy PS3 is likely to result in improved housing, particularly through improvements to privacy for residents, creating more habitable rooms and provision of a mix and range of communal and publicly</p>

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								accessible open spaces and water spaces. Policy PS2 supports the development of tall buildings, which could present opportunities to deliver greater housing densities.
<b>IIA6: Crime &amp; Safety</b>	++	M	D/I	R	R	P	MT	<p>A number of policies within this group provide improvements to safety both directly and indirectly. Generally, they support public realm and high quality design which can engender a sense of pride in a place, which in turn can help to discourage crime.</p> <p>Policy PS2 (tall buildings) considers public safety within the design of tall buildings, including through evacuation routes.</p> <p>Policy PS4 incorporates secured by design principles which will help to improve safety and perception of safety for pedestrians. Additionally, the policy encourages a healthy streets approach. As part of this the 'people feel safe' indicator will help to ensure that whole community should feel comfortable and safe at all times and people should not feel worried about road danger or experience threats to their personal safety.</p> <p>Policy PS5 also includes lighting and signage measures, as well as design to make areas safe for all genders, particularly reducing the fear of crime.</p>
<b>IIA7: Sustainable Transport</b>	+	L	I	L	R	P	MT	Policy PS4 encourages better connectivity and permeability around sites, encouraging people to easily and safely get around the borough. It encourages connectivity to public transport hubs, town centres, open spaces, employment and community facilities. This could help to reduce the demand for use of private vehicles and facilitate a modal shift to more sustainable modes.
<b>IIA8: Accessibility</b>	++	L	D	R	R	P	MT	Policy PS4 outlines the requirements for development to maintain accessible street networks and enhance connectivity through developments. This includes connectivity to public transport hubs and improving accessibility around the borough. The application of the 'healthy streets' approach will ensure that public places are accessible for all.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+	L	D	L	R	P	LT	<p>Policy PS2 requires new development to provides communal open space which may enhance local natural capital. The policy also requires development to have no adverse effect on biodiversity in the local area, preserving species and habitats.</p> <p>PS4 encourages tree planting and the maximisation of planting and soft landscaping to provide visual and environmental relief from hard landscaping. This is likely to provide small scale habitat creation and ecological networks.</p>
<b>IIA10: Landscape &amp; Townscape</b>	++	H	D	R	R/I	P	LT	<p>There are a number of policies within this group that contribute to significant positive effects on IIA10. Policies PS1 and PS2 requires the appropriate scale of new developments, this will protect the borough's landscape and views.</p> <p>Policies PS3 and PS4 support high quality design, the creation of attractive streets, spaces and public realms, as well as active frontages. This contributes to improved landscape and townscape within the borough and an improved streetscape value.</p>

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>Policy PS8 requires the management of key views within the borough. The policy also ensures the value of landmarks are protected. This means that new development is unlikely to negatively impact the local landscape and views.</p> <p>Policy PS9 also requires active shopfronts, which positively contributes to the local townscape.</p>
<b>I/A11: Historic Environment</b>	++	M	D	R	R	P	LT	Policy PS6 specifically outlines the preservation and enhancement of designated and non-designated heritage assets, including archaeological areas and heritage at risk. However, the policy will under some circumstances allow the loss of heritage assets if they meet a stringent criterion. Policy PS7 (world heritage sites) also requires the safeguarding of the two world heritage sites within the borough, resulting in positive effects.
<b>I/A12: Flooding</b>	+	L	I	L	R	P	MT	Supporting text for Policy PS1 states that a design led approach will question whether proposals be built to meet high sustainability standards, and to maximise green spaces and effectively manage flood risk. General improvements to the public realm. Policy PS4 aims to ensure that all new streets contain trees and maximise planting and soft landscaping to provide visual and environmental relief. This could help to intercept rainfall and decrease surface run-off.
<b>I/A13: Water Quality</b>	+	L	I	R	R	P	MT	<p>Policy PS3 supports efficient design, which could include water efficiency, however, this isn't necessarily clear. Supporting water efficient design can help to reduce the risk of environmental pollution, improve water quality and also saves energy. Policy PS2 requires new developments of tall buildings to have no adverse effect on water bodies, which is likely to maintain current water quality.</p> <p>PS4 encourages tree planting and the maximisation of planting and soft landscaping to provide visual and environmental relief from hard landscaping. This is likely to help indirectly improve water quality as trees, shrubs, ground cover and other plants can help filter out pollutants and reduce the amount of pollution that is washed into surface water bodies.</p>
<b>I/A14: Air Quality</b>	+	L	I	R	R	P/T	MT	Policy PS3 (part f) states that use design and construction techniques to ensure that the development does not result in unacceptably harmful impacts arising from air pollution. Policy PS2 requires new development to provide communal open space which may enhance local natural capital. Urban greening will help to support air purification and dust suppression which could help to reduce levels of air pollution within the borough.
<b>I/A15: Climate Change &amp; Resilience</b>	+	L	D	R	I	P	LT	Policy PS3 requires the high-quality design of new developments, including the resilience to overheating. This is likely to contribute to improving the resilience of new developments to heating as a result of climate change. Supporting text for Policy PS1 states that a design led approach will question whether proposal be built to meet high sustainability standards, and to maximise green spaces and effectively manage flood risk. General improvements to the public realm. Policy PS4 aims to ensure that all new streets contain trees and maximise planting and soft landscaping to provide visual and environmental relief. Tree planting and green infrastructure can help to reduce the urban heat island effect.

<b>Policy Grouping</b>	People Places and Spaces							
<b>Policy Codes</b>	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA16: GHG Emissions</b>	+	L	D	L	I	P	LT	Policy PS3 supports the optimisation energy and waste efficiency, which could help to reduce GHG emissions. Part 11 of Policy PS6 aims to retrofit heritage assets to achieve greater levels of energy efficiency and reductions in carbon emissions.
<b>IIA17: Waste</b>	+	L	D	L	I	P	LT	Policy PS4 requires integrated refuse and recycling within new developments. This would contribute to encouraging recycling within new developments, and waste management within the borough.
<b>IIA18: Efficient use of Land and Resources</b>	+	M	D	R	I	P	LT	Policy PS2 supports the development of tall buildings, which can make efficient use of land by delivering greater housing densities and could reduce pressure on the borough's green spaces. Policy PS3 (part d) supports the use of high-quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There are potential for cumulative effects upon IIA15, IIA10 and IIA11 when applied in combination with other policy groups such as Biodiversity and Open Space. There is potential for improved resilience to overheating, positively affecting IIA15.</li> <li>There are also likely to be cumulative improvements to the townscape within the borough, improving streetscape value, as a result of positive development design improving the public realm. This is likely to have positive effects in combination with the Town Centre, Biodiversity and Open Space and Community Infrastructure Policies.</li> <li>There are also positive cumulative effects upon IIA1 (population and equalities) through improved design and accessibility of developments, providing for the current and future population.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>Positive cumulative effects are anticipated through the London Plan policy D9 on tall buildings and the equivalent NLP policy PS2, tall buildings. Both policies are geared towards selecting appropriate locations for the development of tall buildings, doing so in a way that avoids adverse visual impacts and fits into the spatial hierarchy of the borough. This Will work to ensure housing provision does not compromise the environment, and instead continues to protect and improve the townscape of the borough.</li> <li>Safety is also a key consideration in both the London Plan and the NLP. Design Out Crime initiatives working across both policies will result in positive cumulative effects for borough residents.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	No mitigation or enhancement measures have been identified.							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.</li> <li>Securing design quality should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.</li> <li>Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>The policies proposed within the People, Places and Spaces theme have the potential to result in positive health effects upon multiple social groups, primarily through improving housing provision within LBTH.</li> <li>Improved quantity and quality of housing as well as associated access to open space will contribute positively to the physical health and wellbeing of the LBTH population.</li> </ul>							

<b>Policy Grouping</b>	People Places and Spaces							
<b>Policy Codes</b>	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>• Frequent heat episodes as a result of climate change can contribute to the worsening of air quality</li> <li>• The impacts of the UHI generated in will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households</li> <li>• There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH.</li> <li>• There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit.</li> <li>• There are significant health inequalities in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents.</li> <li>• There is a need to provide more greenspaces and high-quality public realm which can provide social spaces</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• Policy PS5 (part G) it may be more inclusive to include all local groups and genders rather than specifically women. Policy supporting text could also include further statistics on LGBTQIA+ communities as it is currently quite focused on male and female genders. Additional reference could be made to the Tackling Violence Against Women and Girls Strategy (2021) and Inclusive Spaces and Places for Girls and Young People, An Introduction for Local Government (2023).</li> <li>• Policy PS1, PS3 and PS4 could incorporate elements of climate resilient design. This could include specific aspects such as rainwater and flood attenuation, SuDs, permeable paving, green roofs etc. Reference could also be made to urban creep.</li> <li>• PS3 touches on efficiency as part of design - this could be strengthened by inclusion (either within the policy or supporting text) on what type of efficiency measure these could include i.e. water efficient measures, energy efficient measures etc.</li> </ul>							

## 2.5 Inclusive Economy and Good Growth

The assessment of the Inclusive Economy and Good Growth Policies are presented in **Table 2-5** below.

**Table 2-5 – Employment and Economic Growth Assessment**

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	+	M	D	R	I	P	LT	<p>Policy EG1 (creating investment and jobs) includes closing the skills gap amongst the working population, improving equalities. The policy also includes affordable workspace, which provides opportunities for smaller, local businesses.</p> <p>Policy EG3 (affordable workspace) also supports those who may have smaller, local businesses, through affordable workspace. This is also likely to provide opportunities for different cultures, improving equalities. Supporting policy text also aims to support disadvantaged groups starting up in any sector</p> <p>Policy EG5 (railway arches) also improves equalities by preserving the railway arches for their current cultural uses, enabling different communities to have economic and employment space within the borough.</p>
<b>I/A2: Human Health</b>	+	L	I	R	I	P	LT	<p>All policies indirectly support human health. There is clear evidence that good employment improves health and wellbeing across people’s lives, not only from an economic standpoint but also in terms of quality of life.</p> <p>Policy EG1 (creating investment and jobs) results in indirect positive effects on human health. The policy closes the skills gap through improving local education levels. Improving education is likely to result in increased opportunities and positive effects on mental wellbeing.</p>
<b>I/A3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	<p>All policies within Employment and Economic Growth contribute to increasing the economic growth within the borough.</p> <p>Policy EG1 (creating investment and jobs) provides a range of workspaces and employment locations. This also improves transport connectivity to employment opportunities. Developing new employment locations promotes growth within the borough.</p> <p>Policy EG2 (new employment space) also contributes to encouraging investment within the borough from businesses utilising the new employment space.</p> <p>Policy EG3 (affordable workspace) also encourages the investment of smaller businesses within the borough. Small business investment in Tower Hamlets encourages diversity of the economy and additional opportunities for economic growth.</p> <p>Policy EG5 (railway arches) also encourages a diverse economy within Tower Hamlets, preserving the industrial economy located in these areas, as well as food and drink, arts and culture that are located in these areas.</p> <p>Policy EG6 (data centres) provides increased provision for employment uses within Tower Hamlets.</p>

Policy Grouping		Inclusive Economy and Good Growth						
Policy Codes		EG1, EG2, EG3, EG4, EG5, EG6						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	<p>All policies within Employment and Economic Growth contribute to increasing the number of employment opportunities within the borough. Policy EG1 (creating investment and jobs) provides improved job opportunities for all groups of the working population, including those with current low levels of education. The policy also provides jobs across the borough, providing jobs for a range of communities.</p> <p>Policy EG2 (new employment space) also creates new spaces for employment opportunities, increasing the number of jobs available within Tower Hamlets.</p> <p>Policy EG5 (railway arches) preserves railway arches within the borough. The railway arches provide employment opportunities for a range of sectors, namely industrial, food and drink, and arts and cultural employment opportunities.</p>
<b>IIA5: Housing</b>	-	M	I	L	I	P	LT	<p>The designation of Strategic Industrial Locations will protect the supply of space in Tower Hamlets for industrial usage. In doing so, other land uses such as housing will face competition for development within the borough. The protection and growth of Strategic Industrial Locations could, therefore, threaten the boroughs housing pipeline.</p>
<b>IIA6: Crime &amp; Safety</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA7: Sustainable Transport</b>	++	M	D	R	R/I	P	LT	<p>Policy EG1 indirectly promotes sustainable transport by ensuring that the benefits of the Elizabeth line are a catalyst for growth within the borough. This is likely to encourage workers to utilise this line, and tube transportation, in order to access employment opportunities and economic opportunities within Tower Hamlets, resulting in positive effects.</p> <p>Policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 also ensures that active travel modes of walking and cycling are investigated within new developments involving railway arches. This encourages the use of sustainable transport access to areas, through improved walking and cycling facilities in these areas.</p> <p>All policies will help to reduce reliance upon the private vehicles and contribute to a modal shift.</p>

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A8: Accessibility	+	M	D	R	I	P	MT	<p>Policy EG1 improves accessibility to jobs through the location of the borough's employment locations. The locations of these employment sites are located with considerations given to access to all, including through public transport.</p> <p>Policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 includes measures to ensure the accessibility to the railway arches by walking and cycling must be included within developments. This contributes to positive effects on accessibility due to walking permeability through the area, allowing those who rely on active and public transport modes, such as those on low incomes, to reach the area.</p>
I/A9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for some habitats to be lost as a result of the implementation of these policies. However, at this stage it is not clear where new development may come forward, therefore uncertain effects have been identified.
I/A10: Landscape & Townscape	+/-	L	D	L	I	P	LT	<p>Mixed positive and negative effects have been identified as there is potential for new employment developments to impact the local townscape and landscape setting.</p> <p>However, Policy EG2 requires that new employment space should contribute towards integrated place making, resulting in positive effects on the local townscape. Policy EG5 also ensures the preservation of railway arches and seeks for railway arches to make a positive contribution to the function of the area, improving the local townscape character and public realm.</p>
I/A11: Historic Environment	+/-	L	I	L	R/I	P	MT	<p>Mixed positive and negative effects have been identified as there is potential for new employment developments to impact the setting of local heritage assets if not sensitively designed.</p> <p>However, the positive placemaking proposed in policy EG2 may result in positive effects on the setting of local heritage assets. This is likely to be determined by individual schemes that may come forward. Policy EG5 also ensures the preservation of railway arches, which are a key heritage asset within the borough. This policy seeks for railway arches to make a positive contribution to the function of the area, improving the local character and public realm.</p>
I/A12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	Urban intensification and additional employment developments could increase flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	M	D	R	R/I	P/T	LT	The construction of new employment developments may temporarily negatively affect air quality due to plant emissions and dust.

<b>Policy Grouping</b>	Inclusive Economy and Good Growth							
<b>Policy Codes</b>	EG1, EG2, EG3, EG4, EG5, EG6							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								<p>However, policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 also ensures that active travel modes of walking and cycling are investigated within new developments involving railway arches. This encourages the use of sustainable transport access to areas, through improved walking and cycling facilities in these areas.</p>
<b>IIA15: Climate Change &amp; Resilience</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of embodied carbon. As the number of developments and the detailed design is not currently available, uncertain effects have been identified.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. As the location of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
<b>IIA18: Efficient use of Land and Resources</b>	+	M	D	L	D	P	MT	Policies aim to protect existing employment floorspace and states that potential additional capacity exists within designated employment locations through the intensification of existing provision. This could help to make best use of existing land. Policy EG5 will also make good use of existing railway arches.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There are opportunities for positive cumulative effects on the economy and employment from the increase in employment and economic growth across the borough.</li> <li>There are also potential cumulative effects upon sustainable transport due to the encouragement of a modal shift towards public and active travel modes.</li> <li>Potential positive cumulative effects are also anticipated for population and equalities due to improved opportunities and resources for current and future populations, including employment opportunities and improved education, meeting community needs.</li> <li>Positive cumulative effects are likely in combination with the Town Centre policies.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>A high level of positive cumulative effects is expected resulting from the synergy of London Plan and NLP policies relating to Inclusive Economy and Good Growth.</li> <li>Both policies strive to provide suitable business spaces, including flexible and hybrid working spaces. These spaces are likely to be well suited to SME's and small independent businesses in both growing sectors and creative businesses looking to set up in the borough.</li> <li>Importantly, the affordability of workspaces is stressed by both the NLP and London Plan, including those targeted towards start-up and early stage businesses. Positive cumulative effect will be resultant of efforts towards ensuring a wide range of economic opportunities all to make the borough fairer, and more inclusive.</li> <li>Finally, both policies put forward plans to improve digital connectivity. Positive cumulative effects of enhanced broadband throughout the borough and assurance that connectivity will meet growing demands of development will be felt by all borough residents.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	<ul style="list-style-type: none"> <li>Mitigation to loss in housing is likely to be solved by the application of housing policies.</li> <li>Mitigation measures for IIA9, IIA10, IIA11 and IIA12 are likely to be based on site specific information once development sites have come forward, but positive placemaking and inclusion of green spaces/ small habitats could help to alleviate negative effects.</li> </ul>							

<b>Policy Grouping</b>	Inclusive Economy and Good Growth							
<b>Policy Codes</b>	EG1, EG2, EG3, EG4, EG5, EG6							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<ul style="list-style-type: none"> <li>Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment).</li> <li>Mitigation for IIA12 is likely to be offered by proposed Policy CG6 which aims to manage flood risk from all sources.</li> </ul>							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>Jobs creation must be evenly distributed across space within the borough to ensure all groups are able to easily access employment.</li> <li>New employment spaces should be a diverse and equal mix of office space and spaces for small businesses to thrive.</li> <li>The accessibility of disabled groups must also be considered when ensuring the walkability of the area. Footpaths must not be obstructed to allow space for wheelchair users to travel through.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's employment spaces.</li> <li>The policies also supports the provision of education and upskilling opportunities throughout the borough. In doing so the current skills gap amongst the working population will likely diminish and a wider range of jobs will be accessible to a greater proportion of the population.</li> <li>The protection and growth of Strategic Industrial Locations could, threaten the boroughs housing stock.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>LBTH is a major location for employment in London, attracting a large daytime population of employees.</li> <li>Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount is employed.</li> <li>It is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough.</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Inclusive Economy and Good Growth policies would benefit from including additional notes to the development of town centre economies and the preservation of these areas.</li> </ul>							

## 2.6 Town Centres

The assessment of the Town Centre Policies are presented in **Table 2-6** below.

**Table 2-6 – Town Centre Policies Assessment**

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	M	D	R	R	P	LT	<p>Policy TC1 (Supporting the network and hierarchy of centres) includes community uses within town centres. This provides facilities for the community and is likely to suit community needs. It sets out plans for Whitechapel to become a civic hub for the borough through the new Town Hall and provide a concentration of health-related community services</p> <p>Policy TC2 (Protecting the diversity, vitality and viability of our town centres) also preserves retail uses within town centres, providing services and amenities for local communities.</p> <p>Policy TC7 (Evening and night time economy) also includes the development of 24 hour shops in close proximity to the borough's centres with night workers (Whitechapel and Brick Lane). This not only provides amenities for the local community but it also ensures that services are more widely available to those workers in the night-time economy who cannot access them during normal business hours.</p>
<b>IIA2: Human Health</b>	+	L	I	R	R	P	MT	<p>All policies help to support social cohesion across the borough, encouraging opportunities for social interaction between community members.</p> <p>Policy TC1 indirectly improves health through providing areas for socialisation, entertainment and culture. This contributes to improving mental wellbeing. There is potential for negative effects on the mental wellbeing of local residents as a result of the night time economy, and noise during night time hours. However, Policy TC7 includes mitigation requirements for night time economy venues, including mitigating noise, reducing the negative health impact upon local residents.</p> <p>Policy TC5 (Food and drink) includes the development of cafes and restaurants. These areas are likely to provide places for socialisation and meeting places, also improving mental wellbeing.</p>

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	<p>All policies within Town Centres contribute to improving the diversity of the economy within Tower Hamlets, and encouraging economic growth through a range of sectors across the borough. Policy TC1 improves the vitality and resilience of the town centres within Tower Hamlets, through promoting different uses and frontages to ensure diverse uses and promote economic growth.</p> <p>Policy TC2 supports the retail function in specialist centres. This contributes to bringing visitors back to the high street and improving the economy of town centres. Encouraging retail also preserves their uses and improves the diversity of town centres.</p> <p>Policy TC7 also improves night time economy within town centres. As the borough has a number of town centres playing a significant role in the night time economy, improvements to the night time economy are likely to have significant positive effects on the borough's overall economy.</p> <p>Policy TC8 (Short-stay accommodation) promotes visitors to Tower Hamlets and is likely to improve the visitor economy.</p> <p>Policy TC4 (Markets) preserves the markets within Tower Hamlets, also preserving cultural diversity within the borough and promoting a diverse economy.</p>
<b>IIA4: Employment &amp; Skills</b>	++	M	D	R	I	P	LT	<p>Additional town centre developments could contribute to the availability of additional employment opportunities within the borough.</p> <p>Policy TC1 directly provides opportunity for employment in retail and hospitality across Tower Hamlets. It also increases employment for night-time workers as a result of the night time economy. A large proportion of town centres in Tower Hamlets provide night time economy areas, improving employment opportunities. Policy TC7 also is likely to result in an increase in employment opportunities as part of the night time economy.</p>
<b>IIA5: Housing</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA6: Crime &amp; Safety</b>	+/-	M	D	R	R	P	MT	<p>Policy TC1 promotes inclusive design, too ensure vulnerable users feel safe during the day and night. The policy also improves accessibility and wayfinding within town centres, improving safety and the feeling of safety.</p> <p>Policy TC7 requires night time economy developments to mitigate against any negative impacts, including noise, odours and anti-social behaviour. This is likely to minimise crime in these areas, particularly from anti social behaviour. New developments are also encouraged to improve the safety of these activities through the 'Ask for Angela' and National Pubwatch schemes. This is also likely to improve the feeling of safety.</p>

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Indirect positive impacts on crime and safety are also likely as a result of improving the active frontages within the borough, preventing vacant areas and reducing the likelihood of crime.
<b>I/A7: Sustainable Transport</b>	+	M	D	R	I	P	LT	<p>All policies outlining development within town centres are likely to indirectly encourage public transportation use as these areas are well connected to existing public transportation.</p> <p>Policy TC6 (Entertainment uses) promotes the development of entertainment uses out of the town centre where there is good public transport accessibility.</p> <p>Policy TC7 also outlines that any out of town centre night time economy developments should have good public transport accessibility (within 400m of a night bus or tube stop).</p> <p>Policy TC8 requires public transport linkages to short stay accommodation to encourage visitors to use public transport.</p>
<b>I/A8: Accessibility</b>	+	L	D	L	R	P	MT	Whilst the Town Centres policies do not include a specific policy addressing accessibility, policy TC5 requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.
<b>I/A9: Biodiversity &amp; Natural Capital</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>I/A10: Landscape &amp; Townscape</b>	+	M	D	R	I	P	LT	<p>All policies place restrictions on developments out of town centres, which will help to preserve the existing townscapes and landscapes within the borough, provided design is sensitive to the existing townscape.</p> <p>Policy TC1 promotes active primary and secondary frontages. This contributes to improving the townscape value and public realm.</p> <p>Policy TC2 preserves town centre usage and is likely to attract visitors and increase footfall, as well as improving frontages and the public realm.</p> <p>Similarly, Policy TC5 prevents the over proliferation of hot food takeaways, also improving the diversity of the townscape.</p> <p>Policy TC9 preserves markets, ensuring a diversity within landscapes and improving the public realm.</p>
<b>I/A11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain if the development of town centres, and associated spaces, will contribute to improvements to the setting of the local historic environment. There is potential that sensitively designed developments could improve the setting of heritage assets, equally they may also erode the historic character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.
<b>I/A12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

<b>Policy Grouping</b>	Town Centres							
<b>Policy Codes</b>	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+	M	I	R	R	T	MT	Policy TC2 seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
<b>IIA15: Climate Change &amp; Resilience</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA16: GHG Emissions</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA17: Waste</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	<p>Policy TC2 outlines that where a vacant site is not utilised, the site is to be supported for other uses to make use of the space. This promotes the use of brownfield/ previously developed land within the borough.</p> <p>Similarly, Policy TC9 outlines that the development of new markets outside of town centres will be supported where they bring vacant sites back into use, further supporting the use of brownfield land/ previously developed land.</p>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>Potential for positive cumulative effects on economy and employment through revitalising and boosting town centres and night time economy.</li> <li>Positive potential effects on landscape in conjunction with other policies through improvements to the public realm.</li> <li>There are also potential positive effects upon crime and safety as a result of improvements to town centre areas, in conjunction with other policies such as People, Places and Spaces.</li> <li>Positive cumulative effects are likely in combination with the Inclusive Economy and Good Growth policies.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>There are potential positive cumulative effects on population and equalities with London Plan 2021 policies (SD4, SD6, SD7, SD8), driving improvements to social infrastructure, including employment opportunities and improved education, meeting community needs.</li> <li>Town centre policies in combination with London Plan 2021 policies (E9, E10) have the potential for positive cumulative effects on the economy, creating a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services. Improvements to the night time economy are likely to have significant positive effects on the borough's overall economy in combination with London Plan 2021 policies (HC5, HC6).</li> <li>Sustainable transport measures are likely to be specific to each development, but there may be cumulative benefits if implemented across plans (as set out in London Plan policies) (SD4, SD6).</li> <li>The preservation of the historic environment is encouraged by London Plan 2021 policies (HC5) whereby the temporary use of vacant buildings (including heritage assets) for creative workspace and activities is encouraged, resulting in positive cumulative effects. This policy supports the restoration of listed buildings; retaining their character for community uses.</li> </ul>							

<b>Policy Grouping</b>	Town Centres							
<b>Policy Codes</b>	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<ul style="list-style-type: none"> <li>• Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment).</li> <li>• Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.</li> <li>• The TfL Healthy Street Principles should be applied and the Healthy Streets Tool should be utilised where appropriate as set out in Policy MC2</li> </ul>							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>• Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the function of designated employment locations.</li> <li>• This policy requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.</li> <li>• The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis.</li> <li>• Operation of the evening economy should be considered in tandem with safety measures to protect groups who could be more likely to be a victim of hate crimes. This includes women, LGBTIQ+ people, and people of different ethnicities. Night time venues can do this through the use of the 'Ask for Angela' and National 'Pubwatch' schemes, for just one example. This is also likely to improve the feeling of safety.</li> <li>• Ensure accessibility standards are adhered to in short-stay accommodation.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>• The policies outlined within the Town Centres theme are likely to have mixed impacts upon the selected health determinants. These impacts are likely to be predominantly positive, with positive effects expected for young people including care leavers, older people, new and expectant mothers, women and girls, people with disabilities, low-income and unemployed groups and socially isolated groups.</li> <li>• Policies support social cohesion across the borough, with existing routes being prioritised and new venues being developed to encourage opportunities for social interaction between community members.</li> <li>• Services are also being made more widely available to those workers in the night-time economy who cannot access them during normal business hours through the requirements for late-opening and 24-hour services.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>• Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour.</li> <li>• There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours.</li> <li>• There are opportunities to increase the safety of active transport modes such as cycling and walking.</li> <li>• Vulnerable road users such as cyclists and pedestrians are more likely to be casualties.</li> <li>• Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping.</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• More emphasis should be placed on ensuring that night time uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as citizen type patrols, CCTV and lighting.</li> </ul>							

## 2.7 Community Infrastructure

The assessment of the Community Infrastructure Policies are presented in **Table 2-7** below.

**Table 2-7 – Community Infrastructure Policies Assessment**

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	++	M	D	R	I	P	LT	<p>All policies within Community Infrastructure contributes to providing community facilities for current and future populations.</p> <p>Policy CI1 (supporting community infrastructure) protects, maintains and enhances existing community facilities and increases the capacity of existing community facilities where other development will increase demand. This improves the provision for the local community and considers both the current and future community needs as well as delivering social value to the community through a range of services and opening hours.</p> <p>Policy CI3 (new and enhanced community facilities) also outlines the development of new community facilities, that will fit local needs and serve the changing needs of the local community.</p>
<b>I/A2: Human Health</b>	++	M	D/I	R	R/I	P	MT/ LT	<p>There are both direct and indirect positive effects on human health as a result of Community Infrastructure policies, through improving physical health and mental wellbeing.</p> <p>Policy CI1 outlines improvements to community facilities, including healthcare and sports and leisure facilities. This improves physical health through encouraging physical activity, as well as improving mental wellbeing through improving spaces for socialisation and encouraging activity.</p> <p>Policy CI3 will help to improve physical health through providing new community facilities and leisure facilities. This also improves mental wellbeing through new social facilities. Additionally, new early education and care facilities will also be located in areas of acceptable air quality, indirectly improving health. This is particularly of note as young people and older people are most at risk of respiratory illnesses such as asthma as a result of poor air quality.</p>

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA3: Economy &amp; Town Centres</b>	++	M	D	R	I	P	LT	<p>Policy CI1 states that new community facilities will be directed towards centres. This promotes the diversity of town centre services and improves visitor numbers to centres, including social facilities like libraries, cultural facilities. This also includes facilities such as public houses, boosting the economy of town centres.</p> <p>Policy CI3 also focuses the development of new and enhanced community facilities in town centres, further boosting and diversifying the economy in Tower Hamlets centres.</p> <p>Policy CI4 (public houses) preserves public houses. This boosts the local economy and provides a diverse range of uses within town centres. Preserving public houses also improves the nighttime economy within Tower Hamlets.</p> <p>Policy CI5 (arts and culture facilities) also outlines that new arts and cultural facilities will be focussed in town centre locations, providing diversity to town centre economies and boosting the nighttime economy.</p>
<b>IIA4: Employment &amp; Skills</b>	++	M	D	R	I	P	LT	<p>The policies within Community Infrastructure contribute to improving education amongst the population of Tower Hamlets.</p> <p>Policy CI1 includes preservation of the existing provision of education facilities, and the development of new facilities in line with community needs. The policy also outlines improving the accessibility of education facilities. This is likely to result in increased educational levels across the borough.</p> <p>Policy CI3 also includes the provision for new early education facilities where required, providing early years educational spaces for young children. Additional adult and higher education facilities are also proposed, improving educational levels across both children and adults within the borough.</p>
<b>IIA5: Housing</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA6: Crime &amp; Safety</b>	+	L	D	R	I	P	LT	<p>Policy CI3 aims to ensure that new community facilities are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of the development. It aims to ensure safety by giving consideration of the use of street facing active frontages and presenting openness to the wider community whilst enhancing a feeling of safety on the streetscape through passive surveillance.</p>
<b>IIA7: Sustainable Transport</b>	+	M	D	R	I	P	LT	<p>All policies aim to improve accessibility to community facilities, which will allow residents to live their lives more locally. This in turn will reduce the reliance upon motorised vehicles and support a modal shift.</p> <p>Policy CI3 aims to ensure that new facilities will be directed towards locations which are accessible to their catchment areas through strong public transport links and by prioritising active travel. This will help to reduce the demand for use of private vehicles and help to support a modal shift.</p>

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA8: Accessibility</b>	++	M	D	R	R	P	LT	<p>Policy CI2 includes the development of accessible, inclusive new facilities. This includes allowing public access. This is likely to improve access to facilities to all groups of the public, including disabled and low income users.</p> <p>Policy CI3 states that new facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.</p>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for community infrastructure developments to result in the loss of biodiversity and natural capital. As the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain if the development of community infrastructure, will contribute to improvements to the setting of the local townscape and landscape character. There is potential that sensitively designed developments could improve townscape, equally they could erode the townscape and landscape character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>It is currently uncertain if the development of community infrastructure, will contribute to improvements to the setting of the local historic environment. There is potential that sensitively designed developments could improve the setting of heritage assets, equally they could erode the historic character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.</p> <p>Policy CI4 (public houses) promotes the preservation of the character of public houses, where development is permitted. Preserving the nature of these assets also has the potential to preserve designated and undesignated heritage assets. However, this is to be determined by individual developments that may arise.</p>
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+	M	I	R	R	T	MT	Policy CI3 seeks to ensure that development proposals for new community facilities take into account air quality levels as part of the relevant guidance from the Department for Education and Sport England. Additionally, the location of early education and care facilities must meet the needs of young children and promote their development, involving their locating away from areas of poor air quality.
<b>IIA15: Climate Change &amp; Resilience</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of embodied carbon. As the number of developments and the detailed design is not currently available, uncertain effects have been identified.

<b>Policy Grouping</b>	Community Infrastructure							
<b>Policy Codes</b>	CI1, CI2, CI3, CI4, CI5							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. As the location of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
<b>IIA18: Efficient use of Land</b>	+	L	I	L	R	P/T	MT/LT	Policy CI3 permits the utilisation of vacant land sites for community uses, which promotes the use of existing sites within the borough.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There are potential positive cumulative effects on the economy as a result of developments within town centres, diversifying the economy.</li> <li>There are also positive cumulative effects upon health (both physical and mental wellbeing) through the increased provision of community spaces, in conjunction with improved physical activity and places for mental wellbeing.</li> <li>The development of additional community facilities, fitting future community needs, also has positive cumulative effects in conjunction with People Places and Spaces and Homes for the Community policies.</li> <li>There is potential for negative cumulative and synergistic effects on biodiversity, landscape and townscape, historic environment, air quality, GHGs, flooding and efficient use land if multiple developments were to come forward. These may conflict with policies PS6, PS7, PS8, BO1, BO2, CG1 and CG9.</li> <li>There is potential for negative cumulative effects upon water quality, air quality and GHG emissions due to increased works and potential land take within the borough, however this is dependent on individual development sites that may come forward.</li> <li>Multiple developments are also likely to be resource intensive and significantly increase levels of embodied carbon as well as emissions associated with construction.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>There are potential positive cumulative effects resulting from the provision of social infrastructure including new community facilities and services if implemented across plans (as set out in London Plan policies) (S1, S2, S3, S4, S5).</li> <li>There are potential for minor negative cumulative effects of high concentrations of licensed premises on crime and safety, anti-social behaviour, noise pollution, health and wellbeing and other issues for residents and nearby uses in combination with London Plan 2021 policies (HC5, HC6). However, Design Out Crime initiatives working across both policies will result in positive cumulative effects for borough residents. The Agent of Change principle is also a key consideration in both the London Plan and the NLP.</li> <li>Sustainable transport measures are likely to be specific to each development, but there may be cumulative benefits if implemented across plans. London Plan policies (HC6) promote boroughs to ensure night-time economy venues are well-served with safe and convenient night-time transport, in line with 24-hour goals. This could have associated benefits for businesses: expanding into night-time economic opportunities.</li> <li>The preservation of the historic environment is encouraged by London Plan 2021 policies (HC5) whereby the temporary use of vacant buildings (including heritage assets) for creative workspace and activities is encouraged, resulting in positive cumulative effects. This policy supports the restoration of listed buildings; retaining their character for community uses.</li> <li>There is potential for positive cumulative effects upon efficient use of land in combination with London Plan 2021 policies (SI7), with developments encouraged to make effective use of the site to maximise the opportunities for multi-purpose and shared use facilities.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	<ul style="list-style-type: none"> <li>Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible.</li> <li>Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment).</li> <li>Application of Policy BO1 will likely help to reduce effects on biodiversity and open spaces.</li> </ul>							

<b>Policy Grouping</b>	Community Infrastructure							
<b>Policy Codes</b>	CI1, CI2, CI3, CI4, CI5							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<ul style="list-style-type: none"> <li>Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply and future planned supply is sufficient in supporting the new community.</li> </ul>							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.</li> <li>New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>These policies will have predominantly positive effects upon the community of LBTH. These policies are anticipated to benefit children and young people, older people, people with disabilities, people with long term health conditions, and socially excluded groups.</li> <li>The improvement of social infrastructure such as parks and sports centres will also increase social cohesion and safety within the borough.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income.</li> <li>There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities.</li> <li>The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile.</li> <li>LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness</li> <li>There is a need to provide more greenspaces and high-quality public realm which can provide social spaces</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Within Policy CI2, the explanation of Part 2 could benefit from including further explanation as to how inclusive design can improve access to disabled users and those with mobility issues.</li> <li>Policy CI2, Part 2 could also benefit from including the promotion of schemes to provide access to low-income groups.</li> </ul>							

## 2.8 Biodiversity and Open Space

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-8** below.

**Table 2-8 – Biodiversity and Open Space Policies Assessment**

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	++	M	D	R	R	P	LT	<p>Policy BO1 (green and blue infrastructure) outlines improvements to the quality of open spaces within the borough, with areas of deficiency to open space being prioritised, therefore improving community facilities. The policy also includes the promotion of using water spaces for cultural and recreational use, providing spaces for the community.</p> <p>Policy BO2 (open spaces and the Green Grid network) provides community facilities within developments to open space, including playgrounds and outdoor gyms. These spaces will be accessible and will ensure high quality inclusive design.</p> <p>Policy BO3 (water spaces) also contributes to improving the local amenity space of riverbanks and dock edges, providing increases in publicly available spaces.</p> <p>Policy BO6 (play and recreation spaces) provides opportunities for sports, recreation and play areas that meet the needs of the population, including providing spaces for children and young people, disabled users, adults and carers. The policy also includes improving provision of play space in areas which have high deficiency to play space, ensuring improved access for all groups.</p> <p>Policy BO7 (food growing) provides spaces for community gardens, and includes the development of community facilities in major housing developments. This provides community spaces for food growing as well as social interaction.</p>
<b>I/A2: Human Health</b>	++	M	D	R	R	P	MT/LT	<p>Policy BO1 maintains and enhances green infrastructure and accessible open spaces. This contributes to improving both mental wellbeing and physical health through providing spaces for social interaction and physical activity. Additionally, this promotes recreation and leisure on blue spaces, improving health.</p> <p>Policy BO2 provides opportunities for physical activity and improvements in wellbeing through providing opportunities for outdoor sport, fitness and recreation. Point 2 (i) also includes the integration of food growing opportunities where feasible. This provides opportunities for healthy foods and promotes healthy lifestyles.</p> <p>Policy BO6 is likely to result in increased physical activity amongst children and young people, and adults, through improving the provision of sports and recreation facilities. This also includes designing spaces to reduce the harm caused by poor air quality. This is likely to reduce the exacerbation of respiratory illnesses amongst children.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy BO7 also improves physical and mental health through the increase in the provision of food growing spaces, and preservation of allotments and community gardens. These provide spaces for social interaction, as well as opportunities for healthy food.
<b>IIA3: Economy &amp; Town Centres</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA4: Employment &amp; Skills</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA5: Housing</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA6: Crime &amp; Safety</b>	+	L	D	L	I	P	LT	<p>Policy BO1 includes the requirement for new green spaces designed to be safe to users. However, it is uncertain what measures will be included to improve safety within open spaces as this is likely to be determined by scheme design.</p> <p>Policy BO3 (specifically point 2 f) improves the safety of the borough's water spaces, including the provision of lifesaving equipment, improved lighting and wayfinding, and managing competing spaces between users. This is likely to improve user safety, and reduce the number of incidents along the borough's water environments.</p> <p>Policy BO6 includes safe design to ensure the safety of users, including children.</p>
<b>IIA7: Sustainable Transport</b>	+	L	D	R	I	P	LT	<p>PO2 outlines developments to the green grid, this contributes to improving the appeal of walking networks, and encouraging active travel.</p> <p>PO3 point 3 also includes the requirement for developments to integrate with the waterside environment, including walkways, cycle paths and towpaths. The integration of these areas is likely to result in improved connectivity of the active travel network, encouraging active travel and promoting sustainable transport modes.</p>
<b>IIA8: Accessibility</b>	+	M	D	R	I	P	LT	<p>Policy BO1 maintains and enhances 'accessible open spaces' throughout the borough, including at Lea River Park as well as improving way-finding to water spaces. This provides spaces for the general public, including all social groups.</p> <p>Policy BO2 also contributes to the delivery of new or enhanced publicly available open space. These spaces are to be designed to be enjoyed by people of all ages and physical abilities.</p> <p>PO6 includes designing spaces for all abilities and ages, addressing barriers to play through inclusion and equality. However, the specific measures proposed will be determined by individual scheme design.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA9: Biodiversity &amp; Natural Capital</b>	++	H	D	R	R	T	LT	<p>All policies within Biodiversity and Open space contribute to improving biodiversity and natural capital across the borough, including improving and enhancing blue and green spaces, green infrastructure, and contributing towards biodiversity net gain (BNG).</p> <p>Policy BO1 requires developments to improve green infrastructure and open space in line with local biodiversity action plans, and improves the green grid network, providing ecological corridors. The policy also enhances blue spaces and improves the ecological and biodiversity values of the borough's water spaces, including rehabilitating and rewilding. Additionally, it outlines requirements for all development proposals to achieve minimum urban greening factor and BNG targets.</p> <p>Policy BO2 enhances biodiversity through improvements to open spaces and the green grid network, this also includes preserving the ecological value of open spaces.</p> <p>Policy BO3 requires developments to enhance the biodiversity of the water space within the borough, as well as rewilding and re-naturalisation, further resulting in improvements to local biodiversity and ecology in the water areas of Tower Hamlets.</p> <p>Policy BO4 protects and retains existing habitats and biodiversity. It also outlines the replacement where preservation is not possible. Additionally, the policy requires developments to deliver a BNG of 30%. There is also a requirement for development proposals to preserve designated European sites, and undertake a Habitat Regulations Assessment where adverse effects are likely. The policy as a whole therefore directly results in preservation and enhancement of biodiversity and natural capital within the borough. Additionally, it contributes to eradicating invasive species where possible.</p> <p>Policy BO5 contributes to developing areas for habitats and biodiversity within the borough, including increasing the provision of trees. Trees provide habitats for a range of species, and increase canopy connectivity, reducing habitat segregation.</p>
<b>IIA10: Landscape &amp; Townscape</b>	++	M	D	R	I	P	LT	<p>Policy BO1 maintains the character of MOL, contributing to preservation of the landscape character. Additionally, preserving green and blue spaces enhances the landscape of Tower Hamlets, proving a range of high quality open spaces. Improving the water environment (point 3) is also likely to improve the appearance of these landscapes, further contributing to positive landscape character.</p> <p>Policy BO2 also provides new or enhanced open space, that is of high quality design and complements local character. These developments are likely to improve the public realm through improvements to open spaces and landscaping.</p> <p>Policy BO3 also contributes to conserving and improving the landscape of Tower Hamlets through enhancements to the setting of water spaces, as well as improving the river banks.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA11: Historic Environment</b>	+	L	D	L	R	P	MT	<p>Policy BO2 requires developments to not have adverse impacts on the heritage value of the borough's open spaces. This policy is also likely to preserve the setting of the borough's open spaces and local heritage assets in these areas.</p> <p>Policy BO3 also contributes to the preservation of the heritage value of water spaces, preserving the historic environment of Tower Hamlets.</p>
<b>IIA12: Flooding</b>	++	L	I	L	I	P	MT/LT	<p>Policy BO2 (specifically 2e) includes the incorporation of soft landscaping and sustainable urban drainage systems (SuDS). This contributes to improving flood resilience within new open space.</p> <p>Policy BO3 has considered flood risk within developments, requiring developments to provide suitable setbacks from water space edges. This contributes to mitigating flood risk and prevents the severance of walkways, cycle paths and canal towpaths during flood events.</p>
<b>IIA13: Water Quality</b>	++	M	D	R	R	P	LT	<p>Policy BO1 seeks to protect the integrity, improve the ecological and biodiversity, and water quality of water spaces within Tower Hamlets. This results in direct positive effects upon water quality.</p> <p>Policy BO3 protects the water environment and ensures that development must not adversely effect the water quality within the borough. Additionally, enhancing the quality of the water space through ecological, biodiversity and aesthetic methods is likely to result in improvements to water quality.</p>
<b>IIA14: Air Quality</b>	+	M	I	R	R	T	MT	<p>Policy BO4 states that development proposals must enhance biodiversity and contribute to nature recovery within the borough. Urban greening and the provision of living building elements is considered especially beneficial in areas of sub-standard air quality throughout the borough.</p>
<b>IIA15: Climate Change &amp; Resilience</b>	++	M	I	R	R	T	LT	<p>Policy BO5 provides opportunities for climate resilience, from measures such as green roofs and walls, SuDS, and trees. These measures can increase drainage and reduce surface runoff, as well as providing shade reducing the risk of overheating.</p>
<b>IIA16: GHG Emissions</b>	+	M	I	R	R	T	LT	<p>Policies BO1, BO4 and BO5 all aim to protect and enhance biodiversity and blue green infrastructure within the borough. The application of green infrastructure presents an opportunity to reduce GHG emissions using a multi-faceted ecosystems-based approach</p>
<b>IIA17: Waste</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA18: Efficient use of Land</b>	+/-	M	D	R	R/I	P/T	MT/LT	<p>Policy BO1 restricts 'inappropriate' development proposals on MOL. This preserves MOL and encourages efficient use of existing brownfield land in the borough. However, Policy BO2 does support development on MOL in specific circumstances. This has the potential to result in the loss of MOL, depending on the nature of schemes that come forward.</p> <p>Policy BO7 provides opportunities for the use of vacant sites as new allotments for food growing spaces. This contributes to making efficient use of land through the utilisation of existing vacant sites.</p>

<b>Policy Grouping</b>	Biodiversity and Open Space							
<b>Policy Codes</b>	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b><i>Intra-project:</i></b> There are potential positive cumulative effects anticipated for population and equalities, health and wellbeing, biodiversity, landscape, water quality, and efficient use of land as a result of the proposed policies. There is likely to be an increase in biodiversity across the borough, and improved community open spaces, as well as improvements to physical and mental health.</p> <p><b><i>Inter-project:</i></b></p> <ul style="list-style-type: none"> <li>• Positive cumulative effects on Population and Equalities are identified as a result of NLP policies (BO7) and London Plan policies (G8). These policies provide provision for community gardens and food production, improving social integration and community cohesion. This may also lead to positive cumulative effects on Human Health, promoting more active lifestyles and better diets.</li> <li>• Urban greening is encouraged by London Plan policies (G5) and complements NLP policies (BO1) that require all development proposals to achieve minimum urban greening factor (UGF) resulting in an increase in green cover throughout the borough.</li> <li>• NLP policies (BO1, BO4) require developments to provide a minimum 2.5 biodiversity unit (BU) per hectare increase or deliver biodiversity net gain (BNG) of 30%, exceeding minimum BNG requirements of 10% and managing impacts on biodiversity as outlined in London Plan policies (G6) generating positive cumulative effects.</li> <li>• Positive cumulative effects are anticipated through the London Plan policies (G3) and NLP Biodiversity and Open Space policies (BO1), protecting Metropolitan Open Land (MOL) from inappropriate development. The London Plan also supports the extension of MOL where appropriate.</li> <li>• NLP policies (BO2) also work harmoniously with London Plan policies (G4) to create areas of publicly accessible open space that complements local character. These developments are likely to improve the public realm.</li> <li>• Enhancements to Water Quality are encouraged through NLP policies (BO3) and London Plan policies (SI17), with positive cumulative effects identified. London Plan policies require developments that facilitate river restoration to be supported, concurrently providing habitats and protecting biodiversity.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	No mitigation measures have been outlined for these policies. Mitigations are likely to be based on site specific information once development sites have come forward.							
<b>HIA and EqIA considerations</b>	<p><b><u>EqIA</u></b></p> <ul style="list-style-type: none"> <li>• New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points.</li> <li>• Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</li> <li>• Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</li> <li>• Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</li> <li>• Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</li> <li>• Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</li> <li>• Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.</li> </ul> <p><b><u>HIA</u></b></p> <ul style="list-style-type: none"> <li>• These policies are anticipated to impacts on most health determinants, including positive effects for children and young people, older people, people with disabilities and mobility impairments, and socially isolated groups including new and expectant mothers.</li> <li>• Improved access to these spaces under this theme will enhance the benefit experienced through socialisation and physical activity opportunities.</li> <li>• Opportunities for education arise from the inclusion of the food growing policy, with young children particularly benefitting from this.</li> </ul>							

<b>Policy Grouping</b>	Biodiversity and Open Space							
<b>Policy Codes</b>	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>• There is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.</li> <li>• Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas</li> <li>• New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity.</li> <li>• The inclusion of BGI can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island effects and help to make developments more climate resilient, especially when it comes to flood mitigation.</li> <li>• Future growth could risk compromising landscape and townscape character and features.</li> <li>• The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat.</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>• Policy BO1 (b) could be changed to "maintain and enhance" the open character of Metropolitan Open Land (MOL)</li> <li>• Policy BO1 (d) (ii) could be amended to include safety measures, such as lighting and clear lines of sight.</li> <li>• Policy BO6 (2) (b) could include ways to tackle barriers to inclusion and equality.</li> <li>• Policy BO4 should make reference to the requirements of BNG under the Environment Act 2021 and Defra's Biodiversity Metric. Part 2 of the policy is quite complicated and some of the text could be moved to the supporting text.</li> </ul>							

## 2.9 Movement and Connectivity

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-9** below.

**Table 2-9 – Movement and Connectivity Policies Assessment**

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	M	D/I	R	R	P	LT	Developing active and sustainable travel networks, as outlined within Policies MC1 (sustainable travel) and MC2 (active travel and healthy streets) contribute to providing services to fit the needs of the current and future population of Tower Hamlets. Additionally, both MC1 and MC2 provide improved accessibility to all social groups, including disabled, elderly, women and girls and other marginalised groups.
<b>IIA2: Human Health</b>	++	M	D	R	I	P	LT	<p>Policy MC1 encourages active travel. This directly results in improvements to human health through improved physical activity rates. Additionally, the policy outlines that active travel developments should utilise the Healthy Streets approach, improving health and wellbeing through the design of developments.</p> <p>Policy MC2 (active travel and healthy streets) also contributes to improving the quality and connectivity of the active travel network. This is likely to improve physical health, as well as implementing the Healthy Streets approach. Additionally, encouraging a modal shift away from private vehicles, as is promoted by all policies within Movement and Connectivity, improves air quality. Air quality improvements also contribute to improving physical health, particularly amongst children and young people, the elderly, and those with respiratory illnesses.</p> <p>Policy MC3 also improves health through the promotion of active travel, improving physical activity. The policy also ensures a reduction in environmental impacts such as improving air quality, improving health and reducing exacerbation of health conditions as a result of poor air quality.</p>
<b>IIA3: Economy &amp; Town Centres</b>	+	M	I	L	I	P	LT	<p>Policy MC1 aims to prioritise the needs of all pedestrians and cyclists, enabling people to choose active travel modes as the primary mode of travel for short trips within the borough, in line with 15-minute city principles. Whilst Policy MC2 states that development proposals must be designed to maximise the contribution of the public realm to encourage and enable active travel modes. It also encourages the use of the Healthy Streets principles to ensure that the development is inclusive and accessible to all groups.</p> <p>Improvements to the public realm and ensuring greater accessibility to all groups, will help to encourage more walking and cycling and increase footfall and potential improve the vitality within the town and district centres.</p>
<b>IIA4: Employment &amp; Skills</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA5: Housing</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA6: Crime &amp; Safety</b>	++	M	D	R	I	P	LT	Policy MC2 outlines the requirements for new developments to provide 2m wide footways and segregated routes for pedestrians and cyclists where possible. This is likely to result in improvements to user safety due to enabling safe overtaking and reducing user conflicts. Point 3 (e) also includes considering the design and safety of women, girls and gender diverse people. This is likely to improve feelings of safety amongst the

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>population. There are also measures to ensure good sight lines and surveillance, further reducing the likelihood of crime.</p> <p>Policy MC4 (parking and permit-free) outlines requirements for secure cycle parking. This is likely to reduce bicycle theft in the borough.</p>
<b>IIA7: Sustainable Transport</b>	?	M	D	R	I	P	LT	<p>Policy MC1 promotes the development of the sustainable travel network, including active travel. This encourages a modal shift away from private transport and towards sustainable transport modes.</p> <p>Additionally, Policy MC2 (active travel and healthy streets) promotes the expansion of walking and cycle network, improving active travel and further encouraging the modal shift from private vehicles.</p> <p>Policy MC4 outlines plans for parking management throughout the borough in order to address issues of congestion as well as respond to the needs of the community. A car free approach will be considered in areas of Tower Hamlets where the PTAL is high (4 or above). However, in those areas where PTAL scores are low, parking will be delivered in line with the London Plan maximum parking targets. This could result in an increased reliance upon private vehicles in those areas in the north and south of the borough, where scores range between 1-3. This will work against the achievement of this I/A objective.</p>
<b>IIA8: Accessibility</b>	++	M	D	R	I	P	LT	<p>Policy MC1 contributes to improving public transport, including enabling walking, wheeling and cycling. This is likely to improve access to all users, including those with mobility issues. Improving public and active transport also allows those on low incomes to access areas of the borough. The policy aims to reduce severance and increase permeability across the borough.</p> <p>Policy MC2 outlines the requirement for new active travel routes will be required to have footways 2m wide or using the Transport for London Pedestrian comfort level tool, whichever is greater. This is likely to improve access to disabled users and users with pushchairs, improving accessibility. Point 3 (e) also includes inclusive design for elderly, disabled and all genders. This also improves connectivity throughout the borough through the development of cycle lanes, including for adapted bicycles, contributing to improved accessibility for all groups.</p> <p>Policy MC4 aims to meet the needs of those community members who rely on private vehicle usage in areas of poor public transport accessibility are also accounted for through the provision of maximum parking in these areas.</p>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in the loss of biodiversity and natural capital. It is anticipated that as the majority of the proposals will be delivered within the existing highway boundary, that loss will be small scale. However, delivery of public realm improvements (as per Policy MC2) may include additional planting and green infrastructure which could provide small scale habitats. As the overall design of proposals is not yet known uncertain effects have been identified.</p>

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A10: Landscape &amp; Townscape</b>	+/-	M	D	R	I	P	LT	<p>All policies support a modal shift and reduction of vehicles on the borough's roads. A reduction in vehicles is likely to result in a reduction of vehicular disturbance, such as noise and air pollution, and subsequently improve the landscape and townscape through reduced numbers of vehicles on roads.</p> <p>Policy MC2 includes development engagement with the Healthy Streets Approach. Utilising this approach, in addition to improving active travel networks is likely to result in positive effects on the local landscape, including improving the public realm, particularly through positive design and the requirements of healthy streets such as 'everyone feels welcome' and 'things to see and do'.</p> <p>Policy MC4 includes the development of electric charging on streets. The integration of electric charging on streets is likely to result in positive effects on the landscape through positive design.</p> <p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in negative effects on the landscape and townscape setting. It is however anticipated that that as the majority of the proposals will be delivered within the existing highway boundary.</p>
<b>I/A11: Historic Environment</b>	+/-	M	D	R	I	P	LT	<p>All policies support a modal shift and reduction of vehicles on the borough's roads. A reduction in vehicles is likely to result in reductions in pollution and disturbance, reducing the degradation of heritage assets and improving their overall setting.</p> <p>Policy MC2 includes the application of a Healthy Streets Approach, which is likely to result in positive effects on the public realm. This may help to improve the setting of heritage assets, however, public realm improvements will need to be sensitive to the historic environment.</p> <p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in negative effects on the historic environment setting. It is however anticipated that that as the majority of the proposals will be delivered within the existing highway boundary.</p>
<b>I/A12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>I/A13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Policy MC5 (sustainable delivery, servicing, and construction) has resulted in uncertain effects on water quality as a result of water freight. Increasing freight on water has the potential to reduce water quality. However, this is likely to be determined by the quantity of freight activity and the nature of freight being transported.
<b>I/A14: Air Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	All policies encouraging active travel and contribute to a modal shift away from private car use and reduction in emissions are likely to contribute to improving air quality across the borough. Additionally, restricting car parking and encouraging car free developments as a starting point for all development proposals, will help to reduce reliance upon motorised vehicles. However, in those areas where PTAL scores are low, parking will be delivered in line with the London Plan maximum parking targets. This could result in an increased reliance upon private vehicles in those areas, and have subsequent effects on air quality.

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>There is also potential for the construction of new and upgraded active travel routes to result in increased to temporarily reduce air quality (from dust and plant emissions) during construction.</p> <p>Policy MC3 (impacts on the transport network) also acknowledges the improvements to air quality through new developments. Additionally, utilising the Healthy Streets Approach considers improving air quality through 'clean air', further contributing to indirect improvements on air quality.</p>
<b>I/A15: Climate Change &amp; Resilience</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>I/A16: GHG Emissions</b>	+/-	M	D	R	R	P	MT	<p>All policies within Movement and Connectivity contribute to encouraging modal shift away from private car use, therefore reducing GHG emissions from vehicles. However, there is potential for the construction of new and upgraded active travel routes to result in increased GHG emissions during construction and they are likely to have high levels of embodied carbon.</p> <p>Policy MC4 includes the provision of electric vehicle charging in new developments. This encourages sustainable vehicles and is likely to reduce GHGs from private vehicles.</p> <p>Policy MC5 also contributes to reducing GHGs. However, the development of new freight areas has the potential to increase emissions. Additionally, despite the policy stating that zero and low emissions freight vehicles should be used where possible, there is potential for the use of traditional freight vehicles and increases in freight activity within Tower Hamlets. This has potential to result in increased GHG emissions depending on the nature of freight vehicles used and increases in activity.</p>
<b>I/A17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. If a preference for road network reallocation is sought there is potential for positive effects. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
<b>I/A18: Efficient use of Land</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The location of some proposals that may come forward as a result of these policies is not yet known. Whilst it is likely that the majority may result in the reallocation of the existing highway network, there could be potential for some land take. If a preference for road network reallocation is sought there is potential for positive effects.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There are potential positive cumulative effects on sustainable transport and accessibility across the borough, as well as air quality improvements. This is likely to result in a modal shift away from private transport and towards public transport and active travel.</li> <li>There are also potential positive effects on health through increased activity rates amongst residents.</li> <li>There is a potential for a cumulative increase in car usage if parking provision is maximised. Making use of private vehicles more convenient could have adverse effects on air quality and GHGs in these locations. This works against Policy MC4.</li> </ul>							

<b>Policy Grouping</b>	Movement and Connectivity							
<b>Policy Codes</b>	MC1, MC2, MC3, MC4, MC5							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>There are likely to be positive cumulative effects on both Population and Equalities and Human Health with NLP policies (MC1, MC2) working in combination with London Plan policies (GG3, T2). Policies improve accessibility to cycling to all social groups, with development proposals encouraged to demonstrate how cycle parking areas will provide facilities for disabled cyclists. The Healthy Streets Approach prioritises health in all planning decisions at t</li> <li>The inclusion of the 'last-mile' principle aligns with policies stated in the London Plan. This is likely to generate positive cumulative effects as the beneficial environmental effects of this process will be more widespread.</li> <li>NLP policies (MC4) require the consideration of potential for residential car parking in areas with low PTALs (1-3) in accordance with the maximum parking standards set out within London Plan policies (T6). These policies will provide cumulative improvements to the provision of residential parking in less accessible areas, reducing barriers of isolation. Conversely, this is likely to result in cumulative negative effects on air quality, human health and GHGs.</li> <li>This also contradicts the borough's Transport Strategy, where Outcome 2 aims to reduce demand for on street car parking and the amount of car trips in the borough</li> <li>NLP policy MC1's intention to improve accessibility of water transport is also concordant with themes of water transport in the London Plan, although no detail is given as to how improved accessibility will be achieved in relation to this mode. As such, no cumulative effects are anticipated to occur.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	<ul style="list-style-type: none"> <li>Where possible, the reallocation of the existing road network should be preferred for the development of new schemes, to avoid loss of greenspaces and habitats and support the efficient use of land.</li> <li>Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible.</li> <li>Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment).</li> </ul>							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>Active travel infrastructure should be accessible and inclusive.</li> <li>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</li> <li>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</li> <li>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</li> <li>It is recommended that the Purple Badge Scheme is maintained to ensure there will be no negative impacts on protected groups, such as disabled people.</li> <li>Management should protect priority bays to maintain accessibility for protected groups.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>These policies are anticipated to impacts on most health determinants, including positive effects for low-income groups and socially isolated groups including new and expectant mothers in particular.</li> <li>The theme is particularly supportive of improvements to settings for social cohesion throughout the borough.</li> <li>While climate change resilience is not directly built into the policies proposed under this theme, the reduced reliance on private vehicles brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>There is a need to improve sustainable transport modes (public and active) in line with LBTH's commitment to reach net-zero GHG emissions by 2045.</li> <li>Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs.</li> <li>Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender.</li> </ul>							

<b>Policy Grouping</b>	Movement and Connectivity							
<b>Policy Codes</b>	MC1, MC2, MC3, MC4, MC5							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<ul style="list-style-type: none"> <li>The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation.</li> <li>Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases.</li> <li>Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality.</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Policy MC2 could benefit from including mention of how sustainable transport can improve access to those on low-incomes.</li> <li>Policy MC5 could be made more stringent by replacing 'should' with 'will'.</li> </ul>							

## 2.10 Reuse, Recycling and Waste

The assessment of the Reuse, Recycling and Waste Policies are presented in **Table 2-10** below.

**Table 2-10 – Reuse, Recycling and Waste Policies Assessment**

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A2: Human Health	+	N/A	N/A	N/A	N/A	N/A	N/A	Policy RW2 (new and enhanced waste facilities) states that waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power. This may help increase the quality of new and existing housing stock and provide a more cost-effective heating solutions. Cost savings may help to reduce health inequalities and reduce the pressure of the rising cost of living.
I/A3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A4: Employment & Skills	+	L	I	L	I	P	LT	The increase in waste facilities may result in employment opportunities for residents within the borough.
I/A5: Housing	+	L	I	L	I	P	LT	Policy RW2 (new and enhanced waste facilities) states that waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power. Whilst this policy does not support the development of new housing, it may help increase the quality of new and existing housing stock and provide a more cost-effective heating solutions.
I/A6: Crime & Safety	+	L	D	L	R	P	LT	Policy RW2 requires new waste facilities to provide on-site measures to ensure safety and security. This is likely to result in a reduction in accidents, and improvement of safety on waste sites.
I/A7: Sustainable Transport	+	L	D	R	R	P	MT	Policy RW2 requires new waste developments, or the development of existing waste sites, to prioritise rail and water transport, as well as utilising zero/ultra-low emission vehicles. This is likely to result in minor positive effects upon sustainable transport through reducing the reliance on HGVs.
I/A8: Accessibility	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for developments to result in the loss of biodiversity and natural capital. As the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
I/A10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	Policies could result in the development of new waste facilities and infrastructure which could negatively affect the landscape and townscape. Policy RW2 does, however, require high quality design for new waste facilities. This is to ensure the integration into local landscape settings. At this stage it is not clear on the design or location of new waste facilities and therefore uncertain effects have been identified.
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	Policies could result in the development of new waste facilities and infrastructure which could negatively affect the historic environment. Policy RW2 does, however, require high quality design for new waste facilities which could ensure the integration into local historic environment. At this stage it is not clear on the design or location of new waste facilities and therefore uncertain effects have been identified.

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	RW2 states that waste transport will prioritise rail and water transport over the road network. There is potential that increase waterborne transport could result in an increase in water pollution and decrease in overall water quality. At this stage the potential increase in water transport is not known, so uncertain effects have been identified.
IIA14: Air Quality	+/-	L	D	R	R	P	LT	Policy RW2 requires new waste sites to minimise air pollutants, noise, vibration, dust and odours and aims to it incorporate measures to minimise carbon emissions and maximise the use of lower-carbon energy sources. Additionally, the utilisation of zero/ultra-low emission vehicles reduces the negative impacts of new sites upon air quality. However, there is potential for negative effects from waste sites operations as their operation may increase levels of air pollutants.
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	+/-	L	D	R	R	P	LT	Policy RW2 results in positive effects on GHGs due to utilisation of zero/ultra-low emission vehicles and the shift towards prioritising rail and water transport over the road network. New waste sites should also minimise carbon emissions and maximise low carbon energy sources. However, there is potential for negative effects from waste sites operations as their operation may increase levels of GHGs and their construction may include significant levels of embodied carbon.
IIA17: Waste	++	M	D	R	I	P	LT	All policies within the Reuse, Recycling and Waste group result in improvements to waste management within the borough.  Policy RW1 (managing our waste) preserves waste facilities within the area and maximises the capacity and efficiency of waste facilities. New development will also be expected to reuse and recycle resources, minimising waste. This policy contributes to meeting future waste management needs within the borough.  Policy RW3 (waste collection facilities in new development) improves the facilities for recycling, organics, residual and bulky waste. The policy also improves the collection systems on site to encourage recycling through engagement and facilities. This is likely to reduce the amount of waste within the borough.
IIA18: Efficient use of Land	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Cumulative/ Synergistic Effects	<p><b>Intra-plan:</b></p> <ul style="list-style-type: none"> <li>There is potential for negative cumulative effects upon water quality, air quality and GHG emissions due to increased works and potential land take within the borough, however this is dependent on individual development sites that may come forward.</li> </ul> <p><b>Inter-plan:</b></p> <ul style="list-style-type: none"> <li>Policy D6 in the London Plan states requirements for housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste. Equivalent policies stated under the Reuse, Recycling and Waste policy theme of the NLP will ensure positive cumulative effects will result.</li> </ul>							

<b>Policy Grouping</b>	Reuse, Recycling and Waste							
<b>Policy Codes</b>	RW1, RW2, RW3							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<ul style="list-style-type: none"> <li>There is the potential for positive cumulative effects on Climate Change &amp; Resilience through the implementation of NLP policies (RW2) and London Plan policies (SI7, SI8, SI9). Development proposals that demonstrate effective implementation of the waste hierarchy and its contribution to the circular economy will be supported: improving resource efficiency, preventing waste, and reducing carbon emissions.</li> </ul>							
<b>Mitigation and Enhancement Measures</b>	<ul style="list-style-type: none"> <li>Sensitive design, as outlined in the Tower Hamlets Reuse, Recycling and Waste Supplementary Planning Document<sup>1</sup> should be considered for any new developments to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment).</li> <li>Application of Policy BO1 will likely help to reduce effects on biodiversity and open spaces.</li> </ul>							
<b>HIA and EqIA considerations</b>	<p><b>EqIA</b></p> <ul style="list-style-type: none"> <li>Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.</li> <li>New waste facilities to be constructed and utilise existing brownfield sites to reduce negative biodiversity and landscape impacts associated with new development.</li> </ul> <p><b>HIA</b></p> <ul style="list-style-type: none"> <li>Reuse, Recycling and Waste policies will have some positive effects on the health determinants identified across a selection of social groups within the borough.</li> <li>Primarily, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.</li> </ul>							
<b>IIA Issues Addressed by Policies</b>	<ul style="list-style-type: none"> <li>The growing population and associated need for development is likely to increase the use of mineral resources and waste generation.</li> <li>Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population.</li> </ul>							
<b>Recommendations</b>	<ul style="list-style-type: none"> <li>Policies could benefit from emphasising the requirement to reduce waste within the borough and improve recycling rates borough wide.</li> <li>Policy RW2 could also benefit from acknowledging and implementing circular economy principles within the development of new waste sites.</li> </ul>							

<sup>1</sup> Tower Hamlets Borough Council (2021) Reuse, Recycling and Waste Supplementary Planning Document. Available online at: <https://talk.towerhamlets.gov.uk/rrwp>



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London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

Appendix G - Assessment of Site Allocations and  
Alternatives



London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

## Appendix G - Assessment of Site Allocations and Alternatives

**Type of document (version) Public**

**Project no. 70103752**

**Our Ref. No. 001**

**Date: June 2024**

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# Quality control

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Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	for Client Review	Final for Regulation 18	Draft for Regulation 19	Final for Regulation 19
Date	September 2023	October 2023	May 2024	June 2024
Prepared by	Charlotte Town	Charlotte Town	Charlotte Town	Charlotte Town
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Signature				
Project number	70103752	70103752	70103752	70103752

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## Introduction

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This Appendix sets out the findings of both the red, amber, green (RAG) analysis and site assessments for both the Proposed Site and Alternative Site allocations.

### RAG Analysis

An initial red, amber, green (RAG) assessment for both the site allocations and alternative sites was undertaken using spatial indicators for each of the IIA Appraisal Framework objectives.

Relevant data on spatial environmental, social and economic indicators, as well as those specifically relevant to health and equalities, have been loaded onto an online WebGIS platform, which has facilitated the site assessments.

It should be noted that the RAG assessment simply highlights the potential sensitivity of different indicators, it doesn't necessarily mean that the indicators are good or bad. For instance, an area of overall deprivation could be more highly sensitive to change so scored R, however, development of the site could in turn reduce levels of deprivation.

Due to this professional expertise has been used to review and validate this initial RAG rating to provide the final assessment of each site.

### Site Assessments

The assessment of policies, spatial approaches and alternatives has considered the following:

- Overall effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible)
- Nature of effect (direct, indirect)
- Spatial Extent (local, regional, national)
- Reversibility of effect:
  - Reversible: The receptor can return to baseline condition without significant intervention
  - Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term) – Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

**Table G-1 – Key to Assessment**

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local – borough wide / regional – Greater London / national - England)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

It should be noted that where uncertain and negligible effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. In this instance, these cells have been left blank.

## Proposed Site Allocations RAG Analysis

Due to the quantity of sites, RAG analysis results have been split into Table G-2 and Table G-3.

**Table G-2 - Proposed Sites RAG Analysis results**

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA1 Population Density	Amber	Amber	Red	Red	Amber	Red	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Red	Red
IIA1 Higher Education	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA1 Secondary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber
IIA1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA1 IMD Overall deprivation (LSOA)	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Red	Red	Amber
IIA2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Children Centres	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Red
IIA2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Allotments	Red	Red	Red	Green	Red	Red	Red	Green	Red	Green	Red	Red	Green	Green	Red	Green
IIA2 IMD Health (LSOA)	Amber	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red
IIA2 Life Expectancy Male	Red	Amber	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Green	Green	Red	Red
IIA2 Life Expectancy Female	Amber	Green	Amber	Red	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Red	Amber

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrip Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
<b>IIA2 Sport Facilities</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA2 Healthcare Facilities</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Town Centres</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Neighbourhood Parade</b>	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red
<b>IIA3/4 Primary Shopping Areas</b>	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Red	Red
<b>IIA3/4 Local Industrial Location</b>	Red	Red	Green	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Tower Hamlets Activity Areas</b>	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA3/4 Central Activities Zone</b>	Green	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA3/4 IMD Income (LSOA)</b>	Amber	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA3/4 IMD Employment (LSOA)</b>	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Red	Red	Amber
<b>IIA3/4 Strategic Industrial Locations</b>	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green
<b>IIA5 IMD Barriers to housing (LSOA)</b>	Red	Red	Amber	Red	Red	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Amber
<b>IIA5 House Price</b>	Red	Red	Amber	Amber	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
<b>IIA6 Crime Rate</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA6 IMD Crime (LSOA)</b>	Red	Amber	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA7/8 London Cycle Network</b>	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Red	Green	Green	Green	Green
<b>IIA7/8 Tube Stations</b>	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Red	Green	Green	Red	Green
<b>IIA7/8 Train Stations</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA7/8 PTAL</b>	Green	Amber	Amber	Green	Green	Green	Amber	Amber	Amber	Red	Red	Red	Amber	Amber	Red	Amber
<b>IIA7/8 Bus Stops</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA7/8 National Cycle Network</b>	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green
<b>IIA7/8 EV Charger Points</b>	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA9 Priority Habitat Inventory</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Red	Amber
<b>IIA9 SAC</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SPA</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SSI</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 LNR</b>	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 NNR</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SINC</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Green Belt</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrip Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
<b>IIA10 Metropolitan Open Land</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Local Open Spaces</b>	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green
<b>IIA10 London View Management Framework</b>	Red	Green	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Tall Building Zone</b>	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green
<b>IIA10 London Squares</b>	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Strategically Important Skyline</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Listed Buildings</b>	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Amber	Green	Green	Red	Green
<b>IIA11 Scheduled Monuments</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Heritage at risk</b>	Red	Green	Green	Red	Red	Amber	Red	Amber	Green	Red	Green	Red	Green	Red	Green	Green
<b>IIA11 Conservation Areas</b>	Red	Green	Red	Red	Red	Red	Red	Amber	Red	Red	Green	Amber	Green	Red	Green	Red
<b>IIA11 Parks and Gardens</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Archaeological Priority Area</b>	Red	Red	Green	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
I/A12 Flood Zone	Green	Red	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red
I/A12 Flood Risk Area	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
I/A13 Water Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A13 Statutory Main River	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Amber	Green	Red	Red	Amber	Red
I/A14 NO2	Red	Red	Amber	Amber	Red	Amber	Amber	Green	Amber	Red	Green	Red	Amber	Amber	Red	Green
I/A14 PM10	Amber	Amber	Amber	Amber	Red	Green	Green	Green	Green	Amber	Green	Red	Amber	Amber	Red	Green
I/A14 Air Quality	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green
I/A15 Climate Risk	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A15 Heat Risk	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A17 Safeguarded Wharves	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Table G-3 - Proposed Sites RAG Analysis results

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
I/A1 Population Density	Red	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A1 Higher Education	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber
I/A1 Secondary Schools	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber
I/A1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A1 IMD Overall deprivation (LSOA)	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber
I/A2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Children Centres	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Red	Green	Green	Red	Red	Green
I/A2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Allotments	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Red
I/A2 IMD Health (LSOA)	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Red	Amber	Amber	Amber
I/A2 Life Expectancy Male	Red	Red	Red	No data	No data	Green	Green	Green	No data	No data	No data	Green	No data	No data	Green	No data	No data
I/A2 Life Expectancy Female	Amber	Amber	Red	No data	No data	Green	Green	Green	No data	No data	No data	Green	No data	No data	Green	No data	No data
I/A2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
<b>IIA3/4 Town Centres</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Neighbourhood Parade</b>	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
<b>IIA3/4 Primary Shopping Areas</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Local Industrial Location</b>	Green	Green	Green	Green	Green	Red	Red	Green	Red	Red	Green	Green	Red	Red	Green	Red	Red
<b>IIA3/4 Tower Hamlets Activity Areas</b>	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber
<b>IIA3/4 Central Activities Zone</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA3/4 IMD Income (LSOA)</b>	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Red	Amber	Amber	Amber
<b>IIA3/4 IMD Employment (LSOA)</b>	Amber	Amber	Red	Red	Green	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber
<b>IIA3/4 Strategic Industrial Locations</b>	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA5 IMD Barriers to housing (LSOA)</b>	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA5 House Price</b>	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA6 Crime Rate</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA6 IMD Crime (LSOA)</b>	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
<b>IIA7/8 London Cycle Network</b>	Red	Green	Red	Red	Green	Green	Red	Red	Green	Red	Red	Red	Green	Red	Red	Red	Red
<b>IIA7/8 Tube Stations</b>	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green
<b>IIA7/8 Train Stations</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA7/8 PTAL</b>	Amber	Red	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Red	Amber	Green	Green
<b>IIA7/8 Bus Stops</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA7/8 National Cycle Network</b>	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Red	Red	Red	Red	Red	Red
<b>IIA7/8 EV Charger Points</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA9 Priority Habitat Inventory</b>	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber
<b>IIA9 SAC</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SPA</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SSI</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 LNR</b>	Green	Green	Green	Green	Green	Red	Amber	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber
<b>IIA9 NNR</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SINC</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Green Belt</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Metropolitan Open Land</b>	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Local Open Spaces</b>	Green	Red	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
<b>IIA10 London View Management Framework</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Tall Building Zone</b>	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA10 London Squares</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Strategically Important Skyline</b>	Green	Green	Green	Green	Red	Green	Green	Red	Red	Green	Red	Green	Red	Green	Red	Red	Red
<b>IIA11 Listed Buildings</b>	Green	Green	Amber	Amber	Amber	Green	Green	Green	Green	Green	Red	Green	Red	Green	Amber	Green	Red
<b>IIA11 Scheduled Monuments</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Heritage at risk</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Conservation Areas</b>	Red	Red	Red	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green
<b>IIA11 Parks and Gardens</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Archaeological Priority Area</b>	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA12 Flood Zone</b>	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
<b>IIA12 Flood Risk Area</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA13 Water Spaces</b>	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
<b>IIA13 Statutory Main River</b>	Green	Red	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA14 NO2</b>	Green	Green	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber
<b>IIA14 PM10</b>	Green	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green
<b>IIA14 Air Quality</b>	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
<b>IIA15 Climate Risk</b>	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Amber	Green	Red	Amber	Green	Amber
<b>IIA15 Heat Risk</b>	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Red	Amber	Amber	Amber
<b>IIA17 Safeguarded Wharves</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

## Proposed Site Allocations Assessment Summaries

### Bishopsgate Goods Yard

Table G-4 - Bishopsgate Goods Yard

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 500 new homes, of which at least 35% will be affordable and the development will include wheelchair adaptable homes (number of which is tbc). In addition, there will be new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. The existing 5-a-side football pitches currently located on the site will be lost as part of development - it is not clear at this stage whether these will be re-provisioned elsewhere in the borough.
I/A2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, leisure facility, healthcare facilities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include a maximum of 11,500sqm of non-residential uses such as retail, workspace, community and cultural. This will include the provision of a leisure facility and an Idea Store, as well as public realm improvements at the ground and platform level. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site will include employment space/ workshops as well as retail. It is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely increase employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	R	I	P	LT	The provision of 500 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include 10% wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

<b>Site Name</b>	Bishopsgate Goods Yard							
<b>Site Capacity</b>	500							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Outline Consent Granted							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having Public Transport Accessibility Levels (PTAL) scores ranging between 5 and 6b. Other than public realm improvements and increased wayfinding, there are no plans for additional transport provision.
<b>IIA8: Accessibility</b>	++	H	D	R	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to walking and cycling routes to and from the site will establish better connections with Shoreditch High Street Overground station, Brick Lane District Centre, Shoreditch Triangle and the new open space, and will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	++	M	D	R	I	P	LT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide a significant increase in greenspace and GI, through the provision of open space (with a minimum size of one hectare) integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape. The site is located within two London View Management Framework (LVMF) areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Pauls Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary negative effects to the local landscape and townscape setting during construction.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within an archaeological priority area, and partially located in the South Shoreditch, Redchurch Street and Brick Lane and Fournier Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The proposed site aims to restore and repair the existing Grade II listed Braithwaite Viaduct and adjoining structures. Enhancement to the public realm will also help to improve the setting of the historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

<b>Site Name</b>	Bishopsgate Goods Yard							
<b>Site Capacity</b>	500							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Outline Consent Granted							
<b>I/A Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>I/A13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>I/A14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>I/A15: Climate Change &amp; Resilience</b>	+	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more green infrastructure (GI) and open space will help to reduce the Urban Heat Island (UHI) effect. The inclusion of sustainable drainage systems (SuDS) is expected, however specific details are not known at this stage. The design of the scheme will include measures to prevent overheating.
<b>I/A16: GHG Emissions</b>	+/-	M	D	L	I	P	LT	There are likely to be significant greenhouse gases (GHG) emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The scheme is expected to make use of Air Source Heat Pumps and be delivered via an electricity-led strategy. Buildings are expected to be energy efficient to reduce reliance on heating.
<b>I/A17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>I/A18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it will result in the loss of the 5-a-side pitches. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Bishopsgate Goods Yard							
<b>Site Capacity</b>	500							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Outline Consent Granted							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p><b>IIA1/2:</b> If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Brick Lane and Pedley Street site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Brick Lane and Pedley Street site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archology from both this site and the Brick Lane and Pedley Street site.</p> <p><b>IIA14:</b> If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Brick Lane and Pedley Street site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Brick Lane and Pedley Street is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/17:</b> The 5-a-side football pitches should be re-provisioned elsewhere in the borough, to avoid a loss in community facilities.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum urban greening factor (UGF) and biodiversity net gain (BNG) targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the Construction Environmental Management Plan (CEMP). The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Table G-5 - London Dock

<b>Site Name</b>	London Dock							
<b>Site Capacity</b>	1800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The development as a whole could deliver up to 1,800 new homes of which a minimum of 35% will be affordable homes. It will be a mixed-use, predominantly residential development. This will include offices, restaurants, shops and a school within twelve multi storey buildings and a one to two storey basement across the footprint of the site. At least 10% of homes will be wheelchair accessible and adaptable. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. This includes Shadwell DLR station and Shadwell train station both, of which, are wheelchair accessible and within 1km of the site as well as nearby bus stops.
<b>IIA2: Human Health</b>	++	H	D/I	R	I	P	LT	As well as housing, the site includes up to 21,500sqm of non-residential floorspace which will provide new retail and employment opportunities, healthcare facilities new secondary school, new parks and open spaces and improvements to the public realm. It is also located within close proximity to existing healthcare and leisure facilities, as well as open spaces which includes Swedenborg Gardens and St George's Gardens that are under 0.5km away which would encourage walking and cycling. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. Homes that are made accessible and adaptable for disabled and wheelchair users would, therefore, increase human health. It will ensure that the needs of all groups will be met both now and in the future.
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	At present the site is located near to central activities zones which includes St Mellons Business centre and primary shopping areas as well as town centres. The development's provision of non-residential floor space such as those which support offices, restaurants and shopfronts. Considering this site is located in the 30-50% most employment deprived and 10-20% income deprived areas, the development will result in a significant increase in the number and diversity of jobs and will improve and enhance connectivity between business clusters and the housing market.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	Considering this site is located in the 30-50% most employment deprived and 10-20% income deprived areas, the development will result in a significant increase in the number and diversity of jobs and will improve and enhance connectivity between business clusters and the housing market. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The provision of 1800 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and at least 10% will include wheelchair accessible and adaptable homes. The size, type and tenure of housing takes into account different

<b>Site Name</b>	London Dock							
<b>Site Capacity</b>	1800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.
<b>IIA6: Crime &amp; Safety</b>	+	M	D	L	R/I	P/T	ST/LT	The site is currently located within an area of moderate crime deprivation (30-50% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	R	I	P	LT	The site is well located to local facilities and services such as bus, rail and underground services within 0.8km and has a PTAL score between 2 and 4. Moreover, other than public realm improvements of pedestrian, cycle paths and increased wayfinding, there are no plans for additional transport provision.
<b>IIA8: Accessibility</b>	++	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. Improvements to pedestrian, cycling and wayfinding will provide better access to the Thomas More Neighbourhood Centre, St Katharine Docks, Tobacco Dock and the Wapping Canal, and to improve walking and cycling connections across the Highway for all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. The site will also provide safe access routes to the new secondary school.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	++	H	D	L	R/I	P	LT	The proposed landscaping will provide a good diversity of nectar-rich flowers, including some night-scented species, which will provide forage for bees and other pollinators and contribute to Local Biodiversity Action Plan (LBAP) objectives. Priority habitats are located to the East (Wapping Woods), North-East (St George's Gardens) and south of the site (Wapping Gardens). On-site landscaping and green roofs proposed under this development are expected to provide a significant net gain in biodiversity, outweighing any potential adverse effects via overshadowing.
<b>IIA10: Landscape &amp; Townscape</b>	+	H	D	L	R/I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm, particularly along the Highway and Vaughan Way, will enhance the quality and condition of the townscape and landscape. Overlooking from residential plots into the school playground would be controlled with high screens and dense vegetation. These would provide a barrier between the school and its surroundings at all levels. The screens are planted with species which would assist in improving the air quality and biodiversity of the area.
<b>IIA11: Historic Environment</b>	+/-	M	D	L	R/I	P/T	ST/LT	The Grade II listed Pennington Street Warehouse is located directly south east of the site. The site also falls to the west of the Tower of London, which is designated as a World Heritage Site. The site is located in close proximity to numerous conservation areas and within an archaeological priority area. A Scheduled monument (Roman Bath House, Shadwell) is also located to the east of the site. The proposed site aims to repair and modify the existing Grade II listed warehouse and adjoining structures. Enhancement to the public realm will also help to improve the setting of the historic environment. There is

<b>Site Name</b>	London Dock							
<b>Site Capacity</b>	1800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								potential of disturbance to archaeology from excavation works during construction and for construction works to adversely affect local heritage assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is situated in a flood risk area classing the development as more vulnerable as it sits in flood zone 3. Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	M	D	L	R/I	P/T	ST/LT	Air quality at this site has moderate levels of NO <sub>2</sub> and PM <sub>10</sub> and sits within an Air Quality Management Area (AQMA). The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. It is assumed that additional mitigation strategies will be incorporated considering the development of a secondary school on the site. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a medium to high overall climate risk and heat risk rating. Whilst the addition of more GI, open space and green roofs will help to reduce the UHI effect, not all climate resilience measures are known at this stage. The site is also situated in a flood risk area classing the development as more vulnerable as it sits in flood zone 3
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development is expected to make use of decentralised energy and solar PV, as well as incorporate energy efficient measures to reduce energy needs. Further design details are still required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	London Dock							
<b>Site Capacity</b>	1800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p><b>IIA1/2:</b> If construction of this site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site will significantly increase the number of businesses and jobs.</p> <p><b>IIA5:</b> In combination, this site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the neighbouring Tobacco Dock site</p> <p><b>IIA14:</b> If construction of this site and the Tobacco Dock were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of this site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 10% accessible homes. A range of housing options to suit all housing needs within the community is necessary in line with policies HF1 and HF2. Development specific EqIAs should be undertaken to ensure inclusive housing is delivered.</p> <p><b>IIA1/2:</b> Further assessment of part of scheme level design should incorporate an evaluation of the provision of healthcare to ensure that the current supply is sufficient in supporting new communities. The application of policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA3:</b> Where the site is located adjacent to a designated town centre, policies TC1-TC8 will ensure that development outside of the town centre will not detrimentally impact on the existing town centre, allowing centres to remain vibrant and sustainable and demonstrating vitality.</p> <p><b>IIA3/4:</b> The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features and heritage assets.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA12:</b> Development should be delivered in line with policy CG6, the NPPF and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Marian Place Gasworks and the Oval

Table G-6 - Marian Place Gasworks and the Oval

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	This site will provide up to 700 new homes of which 35% will be affordable housing. The development will also include 55 wheelchair accessible homes. In addition, the site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. This will also include 1.0 hectares of publicly accessible open space. The site will include new retail and employment opportunities and has current access to healthcare and community facilities; however, no new healthcare facilities are proposed for this site.
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health. As well as housing, the site includes a minimum of 4,000sqm of new non-residential floorspace, which will provide new retail and employment opportunities, and supports urban greening through the provision of new parks and open spaces to encourage and improvements to the public realm. It is noted that no new healthcare facilities are included within the development. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The proposed site will include active uses through the formation of new shopfront openings and public realm improvements at the ground floor level. The site will prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The site is not located within a main town centre; therefore, any main town centre uses must ensure they do not impact on the vitality of existing high streets. The site will provide a range of office, industrial and studio workspaces meeting the needs for businesses serving a more local need, start-ups, small to medium enterprises and creative industries.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	The site will provide a minimum of 4,000sqm of new non-residential floorspace which will include employment space, in particular for start-ups, small and midsize enterprises (SMEs) and creative industry businesses, as well as retail, supporting further job opportunities in the area. The site will provide a range of office, industrial and studio workspaces meeting the needs for businesses serving a more local need, start-ups, small to medium enterprises and creative industries, therefore diversifying the labour market. The site is outside the Activity Area, and so will improve employment opportunities within the locality. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

<b>Site Name</b>	Marian Place Gasworks and the Oval							
<b>Site Capacity</b>	700							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The provision of up to 700 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities. In addition, the site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.
<b>IIA6: Crime &amp; Safety</b>	+	M	I	L	R/I	P/T	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied. The site will include a range of uses and improving public realm including active uses at ground floor level, which will improve overall natural surveillance. Overall, it is considered that the development of the site will inherently improve the perception of safety within the area. The increase of passive surveillance and public foot and cycle traffic, through and around the site, will significantly improve the security of the area.
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site has very good access to sustainable transport as it is located in close proximity to Cambridge Heath station, Bethnal Green underground station, a number of bus stops and a cycle hire scheme, as reflected in a PTAL score between 4-6a. The site includes a new cycle and pedestrian network around the perimeter to improve connectivity with the Cambridge Heath Neighbourhood Centre and along the waterfront at the Regents Canal. Long-stay cycle parking spaces will also serve the site.
<b>IIA8: Accessibility</b>	++	H	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. It is expected that improvements to wayfinding across the site including Legible London Signage which will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel due to improvements in connectivity with the Cambridge Heath Neighbourhood Centre and along the waterfront at the Regents Canal.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	R	R	P	LT	There are no statutory nor non-statutory designated sites of nature conservation interest within or adjacent to the development site. The Northern boundary of the development site adjoins Regent's Canal, which forms part of the London's Canals Site of Importance for Nature Conservation (SINC). The site is also located in close proximity to a number of other SINC's. The development site mainly comprises of areas of extension existing hardstanding and bare ground, with large areas devoid of any vegetation cover and a limited range of species. It is assumed that the potential impacts from pollution are avoided through good construction practice. The green roofs, landscaping and other biodiversity features will enhance the biodiversity of the site. In addition, all proposals for development within the site allocation will look to contribute to an overall provision of 1ha of new public open space

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<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								across the allocation as a whole, delivered through a number of smaller open spaces and pocket parks. This could help to increase biodiversity on site.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site aims to achieve high quality sustainable design for buildings, spaces and 1ha of publicly accessible public realm, which will improve the quality and condition of the townscape and landscape. The site is located within the alignment of the background Wider Setting Consultation Areas of the LVMF SPG views from West Minster Pier to St Paul's and the Queen's Walk to Tower of London. The development will re-use The Oval (which is designated as Local Open Space and Identified as a London Square) as a new public open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is partially located in the Regent's Canal Conservation Area, and Adjacent to the Hackney Road Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. The proposed site will be built upon the existing gas holders, the guide frames no.2 and no.5 of which are located within and contribute positively to the Conservation Area; however, they are subject to a Certificate of Immunity from Listing and considered as non-designated heritage assets. Guide frames will be refurbished to ensure their long-term future, the proposed buildings will pay homage to the gasholder shapes and forms to reflect the industrial legacy of the site. Enhancement to the public realm will also help to improve the setting of the historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+	M	D/I	L	R/I	P/T	ST/LT	The site is located in an area which has a high overall climate risk and heat risk rating. During construction and operation, the site will have a minor adverse residual effect on GHGs. The addition of more GI and open space will help to reduce the UHI effect. SuDS are expected to be delivered within the works at the site.
<b>IIA16: GHG Emissions</b>	+	M	D/I	L	R/I	P/T	ST/LT	During construction and operation, the site will have a minor adverse residual effect on GHGs. The building fabric of the Proposed Development will incorporate energy efficient design and support opportunities for renewable energy production

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<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage, it is not clear the extent of re-use and re-cycling of materials.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The site includes brownfield land. The site will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Devons Road.</p> <p><b>IIA1/2:</b> If construction of this site and the Devons Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Devons Road site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Devons Road site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Devons Road.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Devons Road.</p> <p><b>IIA14:</b> If construction of this site and the Devons Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Devons Road site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Devons Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Devons Road is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further Assessment as part of the scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that current supply is sufficient in supporting new communities.</p> <p><b>IIA6:</b> The development should be designed in accordance with the Secured by Design Principles and Policies PS3 and PS4.</p> <p><b>IIA9:</b> Other policies in the Local Plan should help to avoid potential negative effects, e.g. Policies BO1, BO2, BO3, BO and BO5. The site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Whitechapel South

Table G-7 - Whitechapel South

<b>Site Name</b>	Whitechapel South							
<b>Site Capacity</b>	837 (+ 425 student rooms)							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	+	M	D	L	I	P	LT	<p>The site will provide 837 new homes and has potential to provide at least 425 new rooms for students, which will work positively towards achieving the borough's housing target. The provision of student accommodation is harmonious with the position of the Queen Mary University of London campus. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the third most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public. Overcrowding is significant at this location, with 19965p/h compared to the borough average of 15,695p/h. The provision of communal amenity space under this development would be beneficial to residents. These units have the potential to benefit both students and the wider community, by delivering other priorities such as affordable housing. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	<p>The site safeguards an existing health facility (Royal London Hospital) within the allocation and is also located within close proximity to other existing healthcare and leisure facilities. The site will also provide an NHS primary health care facility (including the reprovision of the existing sexual health and other services).</p> <p>As well as housing and healthcare, the site includes 93,000sqm non-residential floorspace, which will provide new retail and employment opportunities, and supports urban greening through the provision of open spaces to encourage and improvements to the public realm.. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.</p> <p>The site does have good access to healthcare and community facilities; however, it is not clear whether the current provision will meet the needs of the new student population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>

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<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as within part of Whitechapel's bustling town centre and thriving night-time economy. The new town hall in Whitechapel and permanent Residents' Hub supports town centre revival. The site lies within Whitechapel district centre, with both Whitechapel High Street and Whitechapel Market designated as Conservation Areas. The High Street is characterised by small-scale retail and industrial enterprises, and the Market is one of the borough's main local shopping areas. The site will improve town centre viability, with main town centre uses and employment led development proposed within the site including the formation of new shopfront openings and public realm improvements. These measures can support the strategic role of Whitechapel as an emerging hub for life sciences, bio-tech and digital industries.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	The site is within the Whitechapel Local Employment Location with an emerging creative, digital, and ICT hub. It is well located to existing employment areas including the City Fringe Activity Area and the Central Activities Zone. The proposal of an economic led development will provide 93,000sqm of non-residential floorspace which will increase employment opportunities, in particular within the life sciences sector. The site will also provide improved access to existing employment opportunities in the surrounding area. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	++	H	D	L	I	P	LT	The site provides a net gain of over 500+ dwellings, and therefore is sufficient enough to contribute to meeting LBTH's housing supply targets. The site will meet the minimum 35% target of affordable homes. This is beneficial considering its location within a high house price ward. However, the size, type and tenure of housing is not currently known.
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and antisocial behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport, enhanced by the nearby Elizabeth Line station, acting as a catalyst for investment within the ward. This is reflected by the site having a PTAL score ranging between 6a and 6b. The site will enhance connections to the Whitechapel North site allocation, Whitechapel High Street, as well as improved accessibility to the north and south and east and west of the site.

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<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. This is particularly important for students who don't have access to their own private car. The site will enhance connections to the Whitechapel North site allocation, Whitechapel High Street, as well as improved accessibility to the north and south and east and west of the site. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	++	M	D	R	R	P	LT	The site will provide improvements to the green grid should be provided along Whitechapel High Street, Stepney Way, New Road, and Cavell Street, along with good quality connections to surrounding green grid routes. The development should contribute to the delivery of a new and improved green open space (the Green Spine) stretching from Philpot Street to the new civic centre. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new Green Spine to maximise its multi-functional use. This will help to significantly increase biodiversity on site.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The site will contribute to the delivery of the Green Spine (new green open space) stretching from Philpot Street to the new civic centre, which will help to improve visual amenity.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within the Mile End Archaeological Priority Area (APA), and partially within the London Hospital Conservation Area that is listed on the Heritage at Risk Register. There are also a number of listed buildings within the site allocation, with the potential for a locally listed building to be brought back into use. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration; however, this is dependent on scale, massing, layout and materials. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts on the setting of the London Hospital Conservation Area.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from

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<b>I/A Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>I/A15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage.
<b>I/A16: GHG Emissions</b>	+/-	M	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development is expected to be provided with a heat network and enhanced building fabric is expected to reduce energy consumption.
<b>I/A17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction to align with circular economy principles.
<b>I/A18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The site includes brownfield land. The site will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.

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<b>Potential Cumulative/Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North and Watney Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward.</p> <p><b>IIA1/2:</b> If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents. It is unknown if the existing population will respond positively to an increased student population in the area.</p> <p><b>IIA3/4:</b> In combination, this site and the Whitechapel North and Watney Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents, whilst stimulating the economy and town centre of Whitechapel.</p> <p><b>IIA5:</b> In combination, this site and the Whitechapel North and Watney Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of overcrowding and affordability.</p> <p><b>IIA10:</b> If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North and Watney Market site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Whitechapel North and Watney Market site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Whitechapel North and Watney Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Whitechapel North and Watney Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>								

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<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable homes and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities, and specifically the new student population. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4, especially in relation to concerns of noise and ASB potentially generated by the new student population.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA12:</b> The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

**Table G-8 - London Metropolitan University**

<b>Site Name</b>	London Metropolitan University							
<b>Site Capacity</b>	520 student rooms							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site has potential to provide at least 520 new rooms for students, which will work positively towards achieving the borough's housing target. However at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration.</p> <p>The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will provide an additional 33,500 sqm of educational floorspace. However, it is unknown whether this will be open to the public.</p> <p>These units will however, only benefit students and the delivery may compromise the ability to deliver other priorities, in particular affordable housing and facilities which will benefit the wider community. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
<b>IIA2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new student population as well as the wider community. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>
<b>IIA3: Economy &amp; Town Centres</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the town centre. However, there are some businesses located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units may be a key concern.</p>
<b>IIA4: Employment &amp; Skills</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely improve access for residents to employment opportunities. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site has potential to provide at least 520 new rooms for students, which whilst this work positively towards achieving the borough's housing target, it will only benefit students and may compromise the ability to deliver affordable housing.</p>

<b>Site Name</b>	London Metropolitan University							
<b>Site Capacity</b>	520 student rooms							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7:Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL score of 6b. The site will help to improve walking and cycling routes to the underground stations at Aldgate and Aldgate East, Whitechapel High Street and to the north of the site at Wentworth Street.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The site will help to improve walking and cycling routes to the underground stations at Aldgate and Aldgate East, Whitechapel High Street and to the north of the site at Wentworth Street. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+	M	D	R	R	P	LT	Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site will aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm. Although it may not achieve a minimum 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) compared with the pre-development baseline on site, there is potential for the addition of some small habitats.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is located within two LVMF areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Pauls Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary, negative effects to the local landscape and townscape setting during construction. Improved public realm and active frontages should be provided at principal entrances to key buildings, including along the Whitechapel High Street frontage, Goulston Street, and Old Castle Street. Due to the small size, the site aims to provide small 'pocket parks' of publicly accessible open space. This will help to enhance the quality and condition of the townscape and landscape within the area.

<b>Site Name</b>	London Metropolitan University							
<b>Site Capacity</b>	520 student rooms							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within the Aldgate and Portsoken APA, and partially located opposite the Wentworth Street and Whitechapel High Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts. This includes ensuring no negative impact on the backdrop of the view of the Tower of London, and the adaptive re-use of existing locally listed buildings to be explored.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands), allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	M	D	L	I	P	LT	Overall climate risk is medium and the overall heat risk is high. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density student housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	London Metropolitan University							
<b>Site Capacity</b>	520 student rooms							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p><b>IIA1/2:</b> If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA1/6:</b> The site is located in close proximity to existing student accommodation on Whitechapel High St and Leman St which in combination with this site may cumulatively have adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour.</p> <p><b>IIA3/4:</b> In combination, this site and the Brick Lane and Pedley Street site will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Brick Lane and Pedley Street site.</p> <p><b>IIA14:</b> If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Brick Lane and Pedley Street site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Brick Lane and Pedley Street is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least deliver a minimum of 50% of units as affordable student accommodation in line with policy HF6.</p> <p><b>IIA1:</b> The site should provide 10% of student rooms which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use in line with policy HF6.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA3/4:</b> The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum urban greening factor UGF and BNG targets (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife) set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Whitechapel North

Table G-9 - Whitechapel North

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	M	D	L	I	P	LT	The site will provide 1,225 new homes, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the third most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. Swanlea Secondary School sits on the border of the site, facilitating access to education. The site will enhance the NHS primary healthcare facility, re-provide and enhance the leisure centre, and provide a new community facility. At this location, issues of overcrowding are lower than the borough average. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
I/A2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, including Whitechapel Sports Centre and a pharmacy. The site will enhance the NHS primary healthcare facility, re-provide the leisure centre, and provide a new community facility .
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as within part of Whitechapel's bustling town centre and thriving night-time economy. The new town hall in Whitechapel and permanent Residents' Hub supports town centre revival. The site lies within Whitechapel district centre, with both Whitechapel High Street and Whitechapel Market designated as Conservation Areas. The High Street is characterised by small-scale retail and industrial enterprises, and the Market is one of the borough's main local shopping areas.  The site will provide a minimum of 4,500sm of retail space which will help to improve the viability of the town centre. The addition of market facilities as part of the proposed site, including the provision of parking, will help to provide further employment opportunities within the area as well as improving social cohesion of the town centre.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely improve access for residents to employment opportunities. The proposed site will provide at least 4,500sqm of retail space which will increase employment opportunities. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

<b>Site Name</b>	Whitechapel North							
<b>Site Capacity</b>	1225							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	H	D	L	I	P	LT	The provision of 1,225 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail, with the Elizabeth Line station situated beneath the site. This is reflected by the site having PTAL scores ranging between 6a and 6b. Active transport is also encouraged via the London Cycle Network, central within the site. The site will enhance connections to the Whitechapel South site allocation Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street.  Parking for the re-provided supermarket will be provided in a way which minimises the negative impact on the public realm and on primary routes for pedestrians and cyclists.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The site will enhance connections to the Whitechapel South site allocation Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from any designated sites, however, there is potential for some adverse effects on some neighbouring small-scale habitats such as deciduous woodland during construction. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development likely improve townscape and landscape setting.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has a number of heritage assets within its vicinity is predominantly located within the London to Colchester Roman Road TH APA, and partially within the Whitechapel Market Conservation Area. There are two Grade II listed buildings within the site allocation. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts. This includes the repairing and

<b>Site Name</b>	Whitechapel North							
<b>Site Capacity</b>	1225							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								incorporating the locally listed building to the north of the Vallence Road within the development.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will also be a temporary negative effect on air quality due to dust generation and emissions from construction of the re-provisioned community facilities. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is predominantly on previously developed land will support the protection of the borough's green spaces. The site will support 1,225 new homes which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Whitechapel North							
<b>Site Capacity</b>	1225							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel South and Watney Market.</p> <p><b>IIA1/2:</b> If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Whitechapel South and Watney Market site will significantly increase the number of businesses and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Whitechapel South and Watney Market site will significantly increase housing stock.</p> <p><b>IIA10:</b> If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for a negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel South and Watney Market site.</p> <p><b>IIA14:</b> If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Whitechapel South and Watney Market site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Whitechapel South and Watney Market site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Whitechapel South and Watney Market is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Whitechapel North							
<b>Site Capacity</b>	1225							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA3/4:</b> The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA12:</b> The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

## Brick Lane and Pedley Street

Table G-10 - Brick Lane and Pedley Street

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The proposed site will provide the 800 homes as well as up to 33,000sqm of non-residential floorspace to include a five storey office building with ground floor and first floor commercial units and two storey basement for provision of plant, servicing, storage and a gym. This will work positively towards achieving the borough's housing target It is currently unknown how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration.</p> <p>The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The proposed site will also provide new small public open spaces, such as pocket parks, and improvements to the public realm.</p>
IIA2: Human Health	+	M	D	L	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and additional provisions, however the site will provide new community facilities, enhancements to the public realm and improved connectivity to Allen Gardens, the Truman Brewery Estate and Shoreditch High Street station.</p>
IIA3: Economy & Town Centres	++	H	D	L	I	P	LT	<p>The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as being close to Spitalfields bustling town centre, market and thriving night-time economy. The site will provide a minimum of 33,000sqm of non-residential floorspace to include a five storey office building with ground floor and first floor commercial units and two storey basement for provision of plant, servicing, storage and a gym. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p>
IIA4: Employment & Skills	++	H	D	L	I	P	LT	<p>The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site will provide a minimum of 33,000sqm of non-residential floorspace. This will likely improve access for residents to employment opportunities. There are a number of small businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

<b>Site Name</b>	Brick Lane and Pedley Street							
<b>Site Capacity</b>	800							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	+	M	D	L	I	P	LT	The provision of 800 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6b. Improvements to walking and cycling connections will be provided to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. The site will also improve north-south and east-west connections through the existing large number of street bocks currently within the site, such as the Grey Eagle Street car park, the Truman Brewery estate, and the railway lines in the north of the site to improve connectivity.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. Improvements to walking and cycling connections and wayfinding will be provided to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. The site will also improve north-south and east-west connections through the existing large number of street bocks currently within the site, such as the Grey Eagle Street car park, the Truman Brewery estate, and the railway lines in the north of the site to improve connectivity. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	-	M	D	L	R/I	P/T	ST/LT	Allen Gardens falls within the Site boundary. Whilst this is designated as an area of open space it is likely to contain some small-scale habitats. There is potential for construction at the site to result in disturbance to this site, local habitat and species, through the inclusion of public open spaces and pocket parks. At this stage BNG is assumed but whether the site BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is located within two LVMF areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Paul's Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary negative effects to the local landscape and townscape setting during construction.  The site will provide improvements to the public realm through the provision of new small public open space. Improvements to the public realm in this area will also include additional street lighting, wayfinding, and street furniture, to create a sense of place.

<b>Site Name</b>	Brick Lane and Pedley Street							
<b>Site Capacity</b>	800							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within an archaeological priority area, and partially located in the Brick Lane and Fournier Street and Whitechapel High Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The impact of development on nearby heritage assets and conservation areas will be considered. The site will aim to protect and enhance heritage assets, in particular the character of the Fournier Street Conservation Area should be preserved and, where possible, enhanced
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area which has a medium to high overall climate risk and heat risk rating. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is predominantly on previously developed land and will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.

<b>Site Name</b>	Brick Lane and Pedley Street							
<b>Site Capacity</b>	800							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Bishopsgate Goods Yard.</p> <p><b>IIA1/2:</b> If construction of this site and the Bishopsgate Goods Yard site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Bishopsgate Goods Yard site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Bishopsgate Goods Yard site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Bishopsgate Goods Yard.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Bishopsgate Goods Yard site.</p> <p><b>IIA14:</b> If construction of this site and the Bishopsgate Goods Yard site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Bishopsgate Goods Yard site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Bishopsgate Goods Yard is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable homes and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA3/4:</b> The loss of businesses should be avoided, however, in line with Policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> Phase 1 habitat surveys should be undertaken to determine if there are any habitats/ species residing in Allen Gardens.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Bow Common Lane

Table G-11 - Bow Common Lane

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+/-	H	D	R	I	P	LT	The site will provide 1000 new homes, helping towards meeting LBTH's housing target. The ward sits in the second most deprived decile, meaning the high proportion of affordable housing at this site has potential to bring positive effects due to the wards high levels of deprivation. The further construction of tall buildings however, will exacerbate existing problems of overcrowding at this site. Overcrowding is significant at this location, with 20605p/h compared to the borough average of 15,695p/h. The provision of communal amenity space under this development will be beneficial to residents. There are also plans to develop a new sixth form centre, provide new retail and employment opportunities, and bring about improvement to the public realm through the enhancement of Bow Common.
I/A2: Human Health	+	H	D	R	I	P	LT	As well as housing, the site includes 2,500sqm of new retail and employment opportunities, new cultural and community facilities, and improvements to open space and public realm. The sites provision of new facilities and enhancement of existing spaces will improve physical and mental health and wellbeing and reduce levels of loneliness. Tall buildings shortcoming to provide a sufficient quantity of open space for all residents may limit the sites potential to provide accessible greenspace to all.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	As of present, the site is not located in or near a Central Activity Zone or Primary Shopping Area. As such, the developments provision of non-residential floor space such as those which support small to medium enterprise; including creative industries and retail will be highly beneficial to the local economy.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The sites inclusion of 2,500sqm employment space (Class B1) as well as retail will take the form of flexible commercial space, enabling a wide range of small to medium enterprises to set up here. This will generate a mix of commercial activity across the area that will in turn create a range of employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	R	I	P	LT	The provision of 1000 new homes will help towards meeting LBTH's housing target, including the provision of affordable housing At least 35% of all units will be affordable and 10% will include wheelchair accessible and adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

<b>Site Name</b>	Bow Common Lane							
<b>Site Capacity</b>	1000							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	M	D	R	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	R	I	P	LT	Despite average PTAL scores (2-3) the site has relatively good access to public transport, with bus stops located in close proximity to the site on Bow Common Lane and Devons Road. Providing better wayfinding may also help to encourage more people to walk and cycle.
<b>IIA8: Accessibility</b>	++	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	H	D/I	R	I	P	LT	The site sits immediately south-adjacent to Tower Hamlets Cemetery Park Local Nature Reserve (LNR) and SINC, which contains priority habitat of 'created' chalk grassland, a habitat for particular invertebrates, including the Priority Species Small Blue butterfly. The addition of tall buildings at this Site will likely negatively affect the biodiversity present through overshadowing and increased visitors to the park. On-site landscaping and green roofs proposed under this development are expected to provide a significant net gain in biodiversity, outweighing any potential adverse effects via overshadowing.
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	R	I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	-	H	D/I	R	R/I	P/T	ST/LT	The site does not lie within a conservation area or contain any statutory listed buildings. Tower Hamlets Cemetery Park located north adjacent to the Site comprises a Conservation Area and an Archaeological Priority Area. The site seeks the demolition of the locally listed building present in this area. During construction there is also potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	+	L	I	L	R	T	MT	The use of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers.
<b>IIA13: Water Quality</b>	+	L	I	L	R	T	MT	Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.

<b>Site Name</b>	Bow Common Lane							
<b>Site Capacity</b>	1000							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site outlines a car free development other than seven accessible parking spaces which will reduce private vehicle usage and encourage public transport usage amongst residents. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI including green roofs and open space will help to reduce the UHI effect. It is expected that measures for SuDS and minimising overheating will be delivered through the design of buildings and public spaces. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The proposed development seeks to implement energy efficiency measures and renewable energy technologies to deliver CO <sub>2</sub> emission reductions. Further design details are required to fully assess the GHG reduction potential of these measures.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	++	H	D	R	I	P	LT	The development proposes to replace a vacant brownfield, former utilities site and will support the protection of the borough's green spaces. The sites function as high density housing will help to make the best use of the space.

<b>Site Name</b>	Bow Common Lane							
<b>Site Capacity</b>	1000							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Devon Road.</p> <p><b>IIA1/2:</b> If construction of this site and the Devon Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Devon Road site will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Devon Road site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Devon Road site.</p> <p><b>IIA14:</b> If construction of this site and the Devon Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Devon Road site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Devon Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Devon Road is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-12 - Chrisp Street

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 650 new homes, including the re-provision of 124 affordable residential units. The ward sits in the second most deprived decile, meaning the high proportion of affordable housing at this site has potential to bring positive effects due to the wards high levels of deprivation. The provision of 20,000sqm of communal amenity space under this development will be beneficial to residents. There are also plans to increase commercial floorspace, bringing about new retail and employment opportunities, and provide new public realm, landscaping works and child play spaces.
IIA2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, extension of existing multi-use spaces for community usage, the provision of new child play spaces and improvements to open space and public realm. The sites provision of new facilities and enhancement of existing spaces will improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site will encourage a mix of town centre uses including evening and night-time use and a market which will boost the overall vibrancy of Chrisp Street. Enhancements to the existing district centre and market will generate significant new employment and additional annual spend within the area, boosting the local economy.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The sites inclusion of employment space (Class B1) as well as retail will take the form of flexible commercial space, enabling a wide range of small to medium enterprises to set up here. This will generate a mix of commercial activity across the area that will in turn create a range of employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 650 new homes will help towards meeting LBTH's housing target. This will include the re-provision of 124 affordable units which will be beneficial to low income groups in the area. The development recognises that homes must be designed specifically to meet the needs of disabled people, but does not set a specific target of what percentage of new units will be wheelchair accessible and adaptable.
IIA6: Crime & Safety	+	M	D	R	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	H	D	R	I	P	LT	The site has good accessibility to sustainable transport, with access to numerous bus tops on Chrisp Street and East India Dock Road, as well as All Saint DLR Station located

<b>Site Name</b>	Chrisp Street							
<b>Site Capacity</b>	650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, Amendments under consideration							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								50m south east of the site and Langdon Park DLR Station located 160m north of the site. This will help to encourage the new population to seek sustainable transport alternatives. Improving accessibility to services will also help to reduce the need to travel.
<b>IIA8: Accessibility</b>	+	H	D	R	I	P	LT	The site already includes a range of facilities and the proposal includes further provision for community facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+	L	D	L	R	P	MT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide a significant increase in greenspace and GI, which could help to provide new small-scale habitats.
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	R	I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this Site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	+	H	D	R	I	P	LT	The site sits within an Archaeological Priority Area. The developments intention to retain and enhance the existing heritage assets present at the site including the Festival of Britain housing and retail provision at ground floor level, the Clock Tower and the original 1950's Gibberd masterplan for the market will ensure the site does not damage the local heritage setting of the area
<b>IIA12: Flooding</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
<b>IIA13: Water Quality</b>	+	L	I	L	R	T	MT	Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
<b>IIA14: Air Quality</b>	-	H	D	R	I	P	LT	There will be temporary negative effects on air quality due to dust generation and emissions from construction. A number of existing residential receptors surround the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents. The site gives no detail as to how increases in operational air pollution will be managed.
<b>IIA15: Climate Change &amp; Resilience</b>	+	M	D	R	I	P	LT	The site is located in an area which has a high overall climate risk and flood and heat risk rating and is likely to have diminishing resilience to climate change. Green walls, brown and green roofs, and street trees will improve urban greening and are expected to reduce the impacts of the UHI effect.

<b>Site Name</b>	Chrisp Street							
<b>Site Capacity</b>	650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, Amendments under consideration							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
<b>IIA16: GHG Emissions</b>	+/-	M	D	R	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Building efficiency measures are expected to reduce energy reliance. The scheme is also anticipated to make use of heating networks, including the use of combined heat and power and renewable energy, further details are yet to be confirmed.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites Aspen Way and Teviot Estate.</p> <p><b>IIA1/2:</b> If construction of this site and the Aspen Way and Teviot Estate sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Aspen Way and Teviot Estate sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Aspen Way and Teviot Estate sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Aspen Way and Teviot Estate sites.</p> <p><b>IIA14:</b> If construction of this site and the Aspen Way and Teviot Estate sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Aspen Way and Teviot Estate sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites Aspen Way and Teviot Estate is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Chrisp Street							
<b>Site Capacity</b>	650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, Amendments under consideration							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-13 – Alisa Street

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	<p>The site will provide 1450 new residential units, which will work positively towards achieving the borough's housing target. The site is located within the 10% most deprived LSOAs in the borough, meaning that development of this site could increase economic opportunities and reduce poverty. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.</p> <p>The site will also provide 6,500sqm commercial floorspace which will provide workspace, retail, and restaurant uses. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.</p>
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males and females.</p> <p>The site aims to deliver new retail facilities, workspaces and community facilities. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. This will help to improve the health and wellbeing for new residents and those living locally.</p>
<b>IIA3: Economy &amp; Town Centres</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is near Empson Street Strategic Industrial Location, one of London's main reservoirs of industrial and related capacity and is adjacent to Gillender Street Local Industrial Location. The site is not within a town centre, nor is it proposed for any town centre uses. The proposed land uses include the re-provision of existing employment, therefore retaining the current uses rather than revitalising the economy. Affordability of new units may be a key concern for existing business owners.</p>
<b>IIA4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	<p>As well as housing, the site includes the re-provision of existing employment capacity on-site, including complementary commercial uses which support SME, creative industries and new retail. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

<b>Site Name</b>	Ailsa Street							
<b>Site Capacity</b>	1450							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The provision of 1450 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. The development recognises that homes must be designed specifically to meet the needs of disabled people which is reflected in the 10% wheelchair accessible and adaptable homes to be provided.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site has relatively low PTAL scores ranging between 1b and 3, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13. The site will aim to facilitate a new or extended bus route through the site to enhance access to public transport, as well as improving access to public transport and walking and cycling routes across the River Lea.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	There are plans to improve walking and cycling connections to, from and within the site, and support the provision of new and improved A12 and River Lea crossings, to encourage active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. Improvement in walking and cycling connections will improve accessibility, especially for the most deprived.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and The Limehouse Cut Conservation Area which is also designated a SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity along the water edges and within open spaces, which could help to provide new small-scale habitats.
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	L	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The riverside frontage provides a key opportunity to provide high quality spaces that will become part of the public realm, and design principles highlight the need to improve riverside accessibility and the potential to improve access to the Lea River Park and Queen Elizabeth Olympic Park.

<b>Site Name</b>	Ailsa Street							
<b>Site Capacity</b>	1450							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, and adjacent to the Limehouse Cut Conservation Area. The site is close to a number of listed buildings, with the Former Bromley Hall School (Grade II) listed on the Heritage at Risk Register. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is directly adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. The site does however, include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, the development will be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
<b>IIA13: Water Quality</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts during construction.  Once operational, the incorporation of rain and stormwater harvesting could lessen the environmental impact of urbanisation on stormwater drainage systems and the River Lea, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals
<b>IIA14: Air Quality</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+	H	D	L	I	P	LT	Overall climate risk and overall heat risk is high. The landscape design will include a mixture of shrub and tree planting and biodiverse roofs which will contribute towards reducing the UHI, measures to limit overheating are also expected to be delivered which will increase the climate resilience of the development.  In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.

<b>Site Name</b>	Ailsa Street							
<b>Site Capacity</b>	1450							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA16: GHG Emissions</b>	+/ -	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The design of the scheme will incorporate energy efficiency measures and will ensure that construction is undertaken efficiently. A centralised combined heat and power system is expected to be delivered. Solar PV has been identified as a suitable renewable energy source for the site.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has an existing safeguarded waste site, which may be released for other uses due to being an area of regeneration. Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The site includes brownfield land and is also identified as containing vacant land. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Teviot Estate, Aberfeldy Estate and Leven Road. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Teviot Estate, Aberfeldy Estate and Leven Road site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Teviot Estate, Aberfeldy Estate and Leven Road site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Teviot Estate, Aberfeldy Estate and Leven Road is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							

<b>Site Name</b>	Ailsa Street							
<b>Site Capacity</b>	1450							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA13:</b> Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

## Leven Road

Table G-14 – Leven Road

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	<p>The site will provide 2800 new residential units, which will work positively towards achieving the borough's housing target. At least 35% will be affordable homes (70% affordable rent and 30% shared ownership). In addition, there will be new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site is located within the 10% most deprived LSOAs in the borough, meaning that development of this site could increase economic opportunities and reduce poverty. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.</p> <p>The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</p>
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males and females.</p> <p>The site will include additional community facilities including a secondary school, strategic consolidated open space which should include space for sport and recreation. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. This will help to improve the health and wellbeing for new residents and those living locally.</p>
<b>IIA3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	<p>The site allocation includes allowance for employment, through a variety of commercial units and 8,500sqm of commercial floorspace. The site is located near to Chrisp Street district centre and Poplar High Street neighbourhood centre, providing opportunities for residents to live locally and improve connectivity between the housing market and town centres. The proposed site will include the formation of new shopfront openings and public realm improvements at the ground and platform level. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p>
<b>IIA4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	<p>As well as housing, the site includes the re-provision of existing employment capacity on-site. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

<b>Site Name</b>	Leven Road							
<b>Site Capacity</b>	2800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The provision of 2800 new homes will help towards meeting LBTH's housing target. The site is proposed to meet the minimum 35% target of affordable homes. The development recognises that homes must be designed specifically to meet the needs of disabled people to this end, 10% of new units will be wheelchair accessible and adaptable.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community. The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.
<b>IIA7: Sustainable Transport</b>	-	M	D	L	I	P	LT	The site has low PTAL scores ranging between 1a and 2, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	There are plans to make cross river connection improvements, including the new 500m riverside walk, crucial to facilitate active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. Improvement in walking and cycling connections will improve accessibility, especially for the most deprived.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and near The Limehouse Cut Conservation Area. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity along the water edges and within open spaces, which could help to provide new small-scale habitats. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	++	H	D	R	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The riverside frontage provides a key opportunity to provide high quality spaces that will become part of the public realm, and design principles highlight the need to improve riverside accessibility. The site includes strategic scale open space provision, supporting the borough's strategy to reduce open space deficiency.

<b>Site Name</b>	Leven Road							
<b>Site Capacity</b>	2800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, and near to the Limehouse Cut Conservation Area. The site is a former gas works, therefore retaining and integrating the characteristic gasholders in the provision of open space has associated benefits. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is directly adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. The site does however, include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, the development will be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
<b>IIA13: Water Quality</b>	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts during construction.  Once operational, the incorporation of rain and stormwater harvesting could lessen the environmental impact of urbanisation on stormwater drainage systems and the River Lea, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals
<b>IIA14: Air Quality</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+	H	D	L	I	P	LT	Overall climate risk and overall heat risk is high. The delivery of the site is expected to be landscape-led and will provide a green infrastructure grid and large green spaces which will improve the UHI effect. Measures to reduce the risk of overheating have been incorporated into the design of residential homes. SUDs measures will include living roof and rainwater harvesting. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
<b>IIA16: GHG Emissions</b>	+/-	M	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. A site wide heat network is expected to be delivered. Measures to improve energy efficiency will reduce energy demand.,

<b>Site Name</b>	Leven Road							
<b>Site Capacity</b>	2800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The site is derelict brownfield land. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p>							

<b>Site Name</b>	Leven Road							
<b>Site Capacity</b>	2800							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10/IIA11:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA13:</b> Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

## Aberfeldy Estate

Table G-15 – Aberfeldy Estate

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The has potential to provide at least 1550 new homes, of which at least 35% will be affordable. In addition, there will be new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The needs of all groups are taken into account, with provision of a mosque nearby providing a vital cultural facility. The site has potential to provide additional community spaces, including a primary school, as well as the potential for extra-care accommodation or accommodation for people with learning disabilities. This will improve the provision of services for the community.
IIA2: Human Health	++	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. . However, the development of new primary school provision, including playing fields and sports facilities is likely to improve the health and wellbeing of children around the site and Leaside area, providing play and educational facilities. Additionally, the site has potential to provide extra-care accommodation or accommodation for people with learning disabilities.
IIA3: Economy & Town Centres	++	H	D	L	I	P	LT	The site is well located, within Aberfeldy neighbourhood centre, near to Chrisp Street district centre and Poplar High Street neighbourhood centre, <1 km from Canary Wharf Major Centre, and the Isle of Dogs Activity Area. Aberfeldy neighbourhood centre provides a range of shops and services to meet the needs of its local catchment, with a higher proportion of convenience retail compared to comparison retail. The development aims to create a new local centre on Aberfeldy Street, with shops, workspaces, a community centre and mosque. New commercial space will include the provision of affordable workspace for local businesses.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The proposed site is partially located in a town centre (Aberfeldy neighbourhood centre) and is adjacent to a primary shopping area (Chrisp Street primary shopping area), providing opportunities for residents to live locally and improve connectivity between the housing market and town centres. The development aims to provide shops and new commercial space, including affordable workspace for local independent businesses. This will likely increase employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	M	D	L	I	P	LT	The provision of 1550 new homes will help towards meeting LBTH's housing target. The site is proposed to meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.

<b>Site Name</b>	Aberfeldy Estate							
<b>Site Capacity</b>	1550							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-30% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	-	M	D	L	I	P	LT	The site has relatively low PTAL scores ranging between 1b and 3, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13. The site will, however, provide improved walking and cycling connections to, from and within the site.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	There are plans to improve walking and cycling connections to, from and within the site, and support repurposing the existing A12 underpass to create a new walking and cycling route to improve connectivity across Poplar. Creation of healthy streets will also encourage active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	++	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and near The Limehouse Cut Conservation Area. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity through creation of new public realm and upgrades to existing open spaces, which could help to provide new small-scale habitats. The site is expected to deliver an integrated approach to open space, biodiversity and the natural environment through the provision of GI.
<b>IIA10: Landscape &amp; Townscape</b>	++	H	D	R	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The site includes strategic open space provision and has plans for new high-quality planting and landscaping, supporting the borough's strategy to reduce open space deficiency.
<b>IIA11: Historic Environment</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site is located within the Lea Valley and Limmo APA, and near to a number of conservation areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment. Open space within the site will be maintained, and a larger provision of open and amenity spaces will also be provided, integrating new green development into the existing surrounding context. The site will have an overall positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area.

<b>Site Name</b>	Aberfeldy Estate							
<b>Site Capacity</b>	1550							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. No details are currently understood relating to flood risk measures for the site.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts.
<b>IIA14: Air Quality</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	Overall climate risk is high and overall heat risk is medium. Development specific climate resilience measures are not known at this stage, however, the incorporation of GI will help to alleviate the UHI effect.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Teviot Estate, Ailsa Street and Leven Road. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Teviot Estate, Ailsa Street and Leven Road site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Teviot Estate, Ailsa Street and Leven Road site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p>							

<b>Site Name</b>	Aberfeldy Estate							
<b>Site Capacity</b>	1550							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Teviot Estate, Ailsa Street and Leven Road site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Teviot Estate, Ailsa Street and Leven Road site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Teviot Estate, Ailsa Street and Leven Road site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Teviot Estate, Ailsa Street and Leven Road is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA13:</b> Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-16 – Bromley by Bow

<b>Site Name</b>	Bromley by Bow							
<b>Site Capacity</b>	1300							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	<p>The site has potential to provide approximately 1,300 homes, of which 35% will be affordable. This will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable.</p> <p>The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including educational provision and community facilities.</p>
<b>IIA2: Human Health</b>	++	H	D	L	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The provision of open spaces including a 1.2ha park is expected to deliver further health benefits for the population.</p> <p>Additionally, the site development states that residents of the proposed site would not be exposed to excessive noise or other pollution from Bow Free Wharf. This would minimise stress caused by excess noise and improve human health.</p>
<b>IIA3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	<p>There are no town centres within 1km of the site, but Stroudley Walk primary shopping area is located 300m from the site. The site is anticipated to contain employment-generating business space, likely to improve the economy of the area.</p>
<b>IIA4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	<p>The site is in the 10-20% least deprived nationally in terms of employment. The sites anticipated to contain employment-generating business space, and community and educational facilities to provide employment and upskilling opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
<b>IIA5: Housing</b>	+	H	D	R	I	P	LT	<p>The provision of 1,300 new homes will help towards meeting LBTH's housing target. It is assumed that the site will provide 35% affordable housing, meeting the minimum target. Further details will be required regarding the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.</p>
<b>IIA6: Crime &amp; Safety</b>	+	M	D/I	L	I	P	LT	<p>The site is located in the 30-50% most deprived nationally in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to</p>

<b>Site Name</b>	Bromley by Bow							
<b>Site Capacity</b>	1300							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								<p>improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community. Additionally, the site includes improvements to safety within the underpass beneath the A12, as well as improvements to at-grade pedestrian and cycle crossings. This will contribute to improving pedestrian safety at junctions, as well as the feeling of safety.</p> <p>The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.</p>
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station, the underground and the cycle network. This is reflected in the site having a PTAL level of between 3 and 6a. The site is well located to local facilities and services which will allow residents to live their lives more locally.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D/I	L	R/I	P/T	ST/MT	There is an area of priority habitat for mudflats located 30m east of the site. There is a potential negative effect on this habitat as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, however it is unknown whether the site will be in line with BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	R/I	P/T	ST/MT	The site is located 40m from an area of Local Open Green Space (St Leonard's Churchyard). It is therefore expected that the development of the site will respond to the existing character of the surrounding built environment, taking into particular consideration the massing of the surrounding area. There are likely to be temporary negative effects to the local landscape and townscape setting during construction, however, the site will incorporate GI as part of the design including the increase in public realm and public open spaces.
<b>IIA11: Historic Environment</b>	-	L	D/I	L	R/I	P/T	ST/MT	The site has a number of heritage assets within its vicinity, is adjacent to Three Mills Conservation Area and is located within Lea Valley Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.

<b>Site Name</b>	Bromley by Bow							
<b>Site Capacity</b>	1300							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	M	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The incorporation of GI will help to alleviate the UHI effect.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North.</p> <p><b>IIA1/2:</b> If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Whitechapel North site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Whitechapel North site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Whitechapel North.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Whitechapel North site.</p> <p><b>IIA14:</b> If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Whitechapel North site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Whitechapel North site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Whitechapel North is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Bromley by Bow							
<b>Site Capacity</b>	1300							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further Assessment as part of the scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that current supply is sufficient in supporting new communities.</p> <p><b>IIA6:</b> The development should be designed in accordance with the Secured by Design Principles and Policies PS3 and PS4.</p> <p><b>IIA9:</b> Other policies in the Local Plan should help to avoid potential negative effects, e.g. Policies BO1, BO2, BO3, BO and BO5. The site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between public realm and open spaces.</p> <p><b>IIA12:</b> Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p><b>IIA13:</b> Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> The application of policy CG9 will help ensure that measures to improve air quality should be implemented on site during construction and operation</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Blackwall Trading Estate and Leamouth Road Depot

Table G-17 – Blackwall Trading Estate and Leamouth Road Depot

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	+	M	D	R	I	P	LT	The site has potential to provide approximately 775 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
<b>IIA2: Human Health</b>	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is in the top 30-50% nationally. Life expectancy for males and female are also lower than the national average. The site includes the development of a primary health care facility or community facility as required at the site. This will aid in ensuring that there is adequate healthcare and community infrastructure for the increasing population in and around the site.
<b>IIA3: Economy &amp; Town Centres</b>	+	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the top 10-20% most deprived nationally in terms of income. The site is located near London City Island town centre. At this stage it is not known if the site will include any additional retail or business spaces.
<b>IIA4: Employment &amp; Skills</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the top 10-20% most deprived nationally in terms of employment. The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	+	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 775 new homes will help towards meeting LBTH's housing target. It is assumed that the site will provide 35% affordable housing, meeting the minimum target. Further details will be required regarding the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community. The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.

<b>Site Name</b>	Blackwall Trading Estate and Leamouth Road Depot							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	+	L	D	L	I	P	LT	The site has average to good connectivity via public transport through bus and Overground rail, but the site is located 1.75km from the closest tube station. This is reflected in the PTAL score of between 2 and 5. It is uncertain if there are plans for additional transport provision.
<b>IIA8: Accessibility</b>	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	Construction has potential to have temporary adverse effects on the adjacent Bow Creek Ecology Park SINC (across the River Lea in the London Borough of Newham) as well as the mudflat priority habitat, which falls within the site boundary. Habitats are likely to be affected by increase in noise and vibration, temporary reductions in air quality as well as potential land take and/or habitat fragmentation. However, the development aims to incorporate a 'significant amount' of riverside public open space, with elements of biodiversity that complement the adjacent Bow Creek Ecology Park SINC.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located near designated local open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting, particularly through the incorporation of riverside public open space.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Lea Valley archaeological priority area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	--	M	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The incorporation of GI will help to alleviate the UHI effect.

<b>Site Name</b>	Blackwall Trading Estate and Leamouth Road Depot							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the Leven Road site.</p> <p><b>IIA1/2:</b> If construction of this site and the Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Leven Road site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Leven Road site will significantly increase housing stock.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Leven Road site.</p> <p><b>IIA14:</b> If construction of this site and the Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Leven Road site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Leven Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring Leven Road site is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features or local heritage assets.</p> <p><b>IIA8:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12:</b> Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p><b>IIA13:</b> Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to</p>							

<b>Site Name</b>	Blackwall Trading Estate and Leamouth Road Depot							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p>development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Hackney Wick Station

Table G-18 - Hackney Wick Station

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide a minimum of 800 residential properties (300 within Tower Hamlets). The area is located within the 30-50% most deprived neighbourhoods, and it is expected that the site will deliver 35% affordable housing. This site may also be suitable for extra-care accommodation. A range of sizes of housing unit will meet housing requirements for all. It is expected that at least 10% of each tenure type will be designed to be wheelchair user dwellings and located where there is suitable access for parking.</p> <p>The site will be served by a nursery, library and associated community uses which will help to improve local access to services and bring communities together and supporting the changes demographics of the area.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and some community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. As well as housing, the site will include new employment opportunities, and will include new open spaces. The site will therefore reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness, ensuring that the needs of all groups will be met now and in the future.</p>
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>The site will include the provision of active frontages and public realm improvements at ground floor level and prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The site is located within the Hackney Wick neighbourhood centre and so the addition of new retail spaces will improve the vitality of the high street. The site will also replace the existing employment, cultural, creative, retail and residential uses (including a theatre) with the aim to ensure no net loss in employment opportunities. It is expected that a variety of workspace typologies will be provided to meet the local demand.</p>
IIA4: Employment & Skills	++	H	D	R	I	P	LT	<p>The site will include employment space (Class B1, B2 uses) as well as retail. This will likely increase employment opportunities and improve town centre viability. All employment floorspace at the existing site will be replaced to ensure there is no net loss in jobs. A variety of workspace typologies will be provided, as well as a mixture of cultural uses to support existing and emerging demands for business spaces. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

<b>Site Name</b>	Hackney Wick Station							
<b>Site Capacity</b>	800 on the whole allocation (300 within borough)							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The provision of over 800 new homes (300 in Tower Hamlets) will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include 10% wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities. This site may also be suitable for extra-care accommodation.
<b>IIA6: Crime &amp; Safety</b>	+	M	D	L	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). It is assumed that the proposal will be designed in accordance with the Secured by Design Principles. The site will include a range of uses and improving public realm including active uses at ground floor level, which will improve overall natural surveillance. Overall, it is considered that the development of the site will improve perception of safety. Improvements to internal connectivity will increase passive surveillance through and around the site, which will improve the security of the area.
<b>IIA7: Sustainable Transport</b>	++	L	D	L	I	P	LT	The site is in close proximity to underground and overground stations, as well as a number of bus stops. The site connected to the London Cycle Network and the National Cycle Network. This is reflected in a PTAL score between 2-4. Cycle parking is expected to be delivered as part of the site's development. The site is also proposed to deliver a pattern of land use which prioritises walking and cycling and facilitates short trips.
<b>IIA8: Accessibility</b>	++	H	D	R	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The level of additional services provided on-site will deliver a pattern of land use which prioritises walking and cycling, and reduces the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	L	R/I	P/T	ST/LT	There are no statutory or non-statutory designated sites within the site, an area of prior habitat deciduous woodland is located to the south west of the site. The site is also located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide an increase in GI (particularly from the redevelopment of Queen's Yard), which could help to provide new small-scale habitats. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	L	R/I	P/T	ST/LT	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. Improvements to public realm and consideration of the design within will improve townscape and landscape setting.

<b>Site Name</b>	Hackney Wick Station							
<b>Site Capacity</b>	800 on the whole allocation (300 within borough)							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+	M	D	L	R/I	P/T	ST/LT	The site lies within the Hackney Wick and Fish Island Conservation Areas and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. It is expected that the site will reduce the number of vacant sites and buildings which currently have a negative impact on the designated heritage assets. The site will demonstrate buildings of industrial character, in-keeping with the existing site.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site lies within Flood Zones 2 and 3. It is expected that the site will achieve safety through the sequential allocation of development types and appropriate flood resilience measures. At this stage, flood risk and sustainable drainage measures have not been fully realised.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is adjacent to a main river, and so consideration to adequately mitigate against adverse impacts on water quality as a result of the development is key to the delivery of the site.
<b>IIA14: Air Quality</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	Air quality at the site is good with low levels of NO <sub>2</sub> and PM <sub>10</sub> . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are high. Development specific climate resilience measures are not known at this stage. The addition of GI will help to alleviate the UHI effect, but more specific climate resilient design measures are not known at this time.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	++	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing and mixed-use development which will help to make the best use of the site.

<b>Site Name</b>	Hackney Wick Station							
<b>Site Capacity</b>	800 on the whole allocation (300 within borough)							
<b>Site Source</b>	New allocation - LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater</p> <p><b>IIA1/2:</b> If construction of this site and the other allocated sites at Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites.</p> <p><b>IIA14:</b> If construction of this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15/16:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Hepscott Road

Table G-19 – Hepscott Road

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	M	D	R	I	P	LT	The site is anticipated to provide up to 525 new homes, of which 35% will be affordable, this is key for the area as it falls within the 30-50% most deprived. The site has fair access to some community services which will help to bring communities together and support a changing demographic. The site will also include additional community and cultural facilities and may be potentially suitable for extra-care accommodation.
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health. Health deprivation is currently high, and the life expectancy for men is worse than the national average. The site will comprise of mixed-use development opportunities, supports urban greening through the provision of canal-side open space, and encourages improvements to the public realm. Community uses will also be included within the development site to meet the needs of the additional population. Overall, the site is expected to reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. The site will promote active travel through the provision of new walking and cycling routes by and providing connection to the Hertford Union Canal towpath, Roach Point Bridge, and Hackney Wick Station. It will ensure that the needs of all groups will be met both now and in the future.
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The proposed site will include active uses through the formation of active frontage and non-residential ground floor frontage, prioritising mixed use development with residential properties above ground floor level, improving connectivity between business clusters. New shopfront openings and public realm improvements at the ground floor level. The site will prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The Site is located within close proximity to the Hackney Wick Neighbourhood Centre. The site will serve a range of business needs providing employment, creative and cultural uses.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	The site will include employment space, supporting further job opportunities in the area. The site is expected to provide a range of employment, creative and cultural uses, meeting the needs for businesses and diversifying the labour market. The Site is outside the Activity Area, and so will improve employment opportunities within the locality. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	++	H	D	L	I	P	LT	The provision of approximately 525 new homes will help towards meeting LBTH and LLDC's housing target. At least 35% of all units will be affordable. It is expected that the size, type and tenure of housing takes into account different groups in the community, including but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

<b>Site Name</b>	Hepscott Road							
<b>Site Capacity</b>	525							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	M	D	L	R/I	P/T	LT	The site is located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The Site will include a range of uses and will improve public realm including active uses at ground floor level, which will improve overall natural surveillance, particularly considering the existing waste management use of the site. It is expected that the development of the site would improve the perception of safety within the area compared to the existing nature of the site as a waste management facility. Improvements to connections for public foot and cycle traffic through the site are also expected to improve the security of the area
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site is in a fairly sustainable location, located in close proximity to Hackney Wick Railway Station, a number of bus stops. The site is not connected to the London Cycle Network, and is not in close proximity to EV charging infrastructure. This is reflected in a PTAL score between 2-3. The site includes the development of new walking and cycle routes providing connections to the Hertford Union Canal towpath, Roach Point Bridge and Hackney Wick Station.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel, the additional services to be provided on site is expected to sufficiently serve the new population of the area.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	++	M	D	L	I	P	LT	Areas of deciduous woodland are located <0.8km from the Site. The site is also located in close proximity to a number of SINCs. There are no other statutory or non-statutory designated sites of nature conservation interest within or adjacent to the development site. A canal is located to the South of the Site. The development site mainly comprises of previously developed brownfield land, with most areas limited in vegetative cover. It is expected that there will be a minor adverse impact on ecology during construction. The site will include a linear park alongside the canal which will improve GI corridors and enhance the biodiversity of the site, which outweighs harm during the construction phase.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	I	P	LT	The site is located adjacent to MOL to the South and designated Open Space to the West. The site is expected to respond positively to the waterfront setting, enhancing the character of the canal and enhance strategic views west towards central London, and aims to achieve high quality public realm improvements.
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Fish Island Conservation Area and the Lea Valley Archaeological Priority Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. It is anticipated that the development will make use of to ensure the retention and reuse of buildings of heritage value, and how development should preserve and enhance the conservation area, and where outside, enhance its setting.

<b>Site Name</b>	Hepscott Road							
<b>Site Capacity</b>	525							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>I/A Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>I/A12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
<b>I/A13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to Hertford Union Canal. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff.
<b>I/A14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements will also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>I/A15: Climate Change &amp; Resilience</b>	+	M	D/I	L	I	P	LT	Overall climate risk and overall heat risk are both high. Climate resilience measures are expected to reduce impacts of overheating risk and GI is a key element of the scheme to be delivered which should reduce the impacts of the UHI Effect. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>I/A16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
<b>I/A17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>I/A18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Hepscott Road							
<b>Site Capacity</b>	525							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater</p> <p><b>IIA1/2:</b> If construction of this site and the other allocated sites at Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites.</p> <p><b>IIA14:</b> If construction of this site and the Neptune Wharf Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 10% accessible homes. A range of housing options to suit all housing needs within the community is necessary in line with policies HF1 and HF2.</p> <p><b>IIA1/2:</b> Further assessment of part of scheme level design should incorporate an evaluation of the provision of healthcare to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA3:</b> Where the site is located adjacent to a designated town centre, policies TC1-TC8 will ensure that development outside of the town centre will not detrimentally impact on the existing town centre, allowing centres to remain vibrant and sustainable and demonstrating vitality.</p> <p><b>IIA3/4:</b> The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Sustainable Transport should be delivered as part of the development, in line with the requirements of policies MC1 and MC2.</p> <p><b>IIA9:</b> In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12:</b> Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p><b>IIA13:</b> Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon</p>							

<b>Site Name</b>	Hepscott Road							
<b>Site Capacity</b>	525							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p>heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-20 – Sweetwater

<b>Site Name</b>	Sweetwater							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The site will provide up to 775 residential properties. The area is located within the 30-50% most deprived neighbourhoods, and 30% of the housing proposed will be affordable. A range of sizes of unit are proposed to meet housing requirements for all. At least 10% of each tenure type are designed to be wheelchair user dwellings and located where there is suitable access for parking. Access to services and facilities is generally good, and the site will be served by a nursery, library and associated community uses which will help to bring communities together and supporting the changes demographics of the area. The site will also be supported by public realm.
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health, including significant areas of parks and open spaces. Health deprivation is currently high, and the life expectancy for men is worse than the national average. The site will comprise of mixed-use development opportunities and supports urban greening through the provision of a canal-side walk, which will improve public realm and provide safe spaces for walking and cycling, and the provision of play spaces. A new NHS healthcare facility will also be provided. Other community facilities include a library and community centre and a nursery and outdoor play spaces. Overall, the site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The site lies in an out-of-centre location, with Hackney Wick Neighbourhood Centre being the closest to the site. The site will deliver non-residential floorspace so that the needs of residents are responded to and provide a mixture of uses to establish its own neighbourhood centre which will complement the wider Hackney Wick Area, and introduce its own neighbourhood parade into the locality. The site will include active uses through the formation of active frontage and non-residential ground floor frontage, prioritising mixed use development with residential properties above ground floor level, improving connectivity between business clusters.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	The site is within the 10-20% most deprived in terms of income, and the 30-50% most deprived in terms of employment. The site will include employment and commercial floor space, supporting further job opportunities in the area. The Site is outside the Activity Area and other industrial locations and so will improve and generate local employment opportunities. Ground floor uses will create its own neighbourhood centre, in an area where there are currently no neighbourhood parades within close vicinity to the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

<b>Site Name</b>	Sweetwater							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The provision of 775 new homes will help towards meeting LBTH and LLDCs housing targets. The site is within the 10-20% most deprived in relation to barriers to housing. At least 30% of all units will be affordable. 10% of residential units will be accessible homes. The site will include housing units in a range of sizes to suit all members of the community.
<b>IIA6: Crime &amp; Safety</b>	+	M	D/I	L	R/I	P/T	ST/LT	The site is located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The site will include a range of uses and will improve public realm including active uses at ground floor level, which will improve overall natural surveillance. It is assumed the site has been designed in mind with measures to design out crime, and so the development will inherently improve the perception of safety within the area. Improvements to connections for public foot and cycle traffic through the site are also expected to improve the security of the area.
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site is in a fairly sustainable location, and is located in close proximity to Hackney Wick Railway Station, Pudding Mill Lane and Stratford International DLR stations, as well as a number of bus stops. The site connected to the London Cycle Network. There is little EV charging infrastructure at the site. This is reflected in a PTAL score between 2-3. The site will include 20% EV charging when operational. Also, walking and cycling routes are proposed, as well as secure cycle parking. The site is also proposed to deliver a pattern of land use which prioritises walking and cycling and facilitates short trips.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The level of additional services provided on-site will deliver a pattern of land use which prioritises walking and cycling and reduces the need to travel. Accessible parking bays will be provided for wheelchair accessible dwellings for 3% of accessible dwellings for up to an additional 7%.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	H	D	R	I	P	LT	There are no statutory or non-statutory designated sites within the site, an area of prior habitat deciduous woodland is located to the south of the site. The site is also located in close proximity to a number of SINCS. The site is expected to deliver an integrated approach to open space, biodiversity and the natural environment through the provision of GI. It is expected that during construction there will be an adverse impact on ecology. It is assumed that BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) will be delivered through the development of the Canal Park, the proposed liveable streets, and green roofs.
<b>IIA10: Landscape &amp; Townscape</b>	++	M	D	L	R/I	P/T	ST/LT	Local Open Space within the site will be maintained, and a larger provision of open and amenity spaces will also be provided through the approved landscaping plan, integrating new green development into the existing surrounding context. The site will have an overall positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area. Active frontage would be created along the canal, and green landscapes areas will be maintained to set development back from the river frontage to maintain the character of the canal side.

<b>Site Name</b>	Sweetwater							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+	M	I	L	R/I	P/T	ST/LT	The site lies within close proximity to the Fish Island, Hackney Wick, and White Post Lane Conservation Areas and is situated within the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets, which must be mitigated against. The site will lead to the enhancement of existing views and greening which will have a positive impact on heritage assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a main river, and so consideration to adequately mitigate against adverse impacts on water quality as a result of the development is key to the delivery of the site.
<b>IIA14: Air Quality</b>	+/-	M	D	L	I	T	ST	Air quality is generally good at the site. The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions. Residential properties will be set back and separated from main vehicle circulation routes by street trees to reduce impact on the local community.
<b>IIA15: Climate Change &amp; Resilience</b>	+	H	D	L	I	P	LT	The site is identified as being at high heat and climate risk. The addition of more GI and open space will help to reduce the UHI effect. It is expected that homes and non-residential units will be constructed to energy efficient standards and will make use of renewable energy. It is assumed sustainable construction practices will be used. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is uncertain if the development will include renewable energy sources.
<b>IIA17: Waste</b>	+	M	D	L	I	P/T	ST	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site The site will encourage sustainable use of materials through the use of recycled aggregated and materials
<b>IIA18: Efficient use of Land</b>	++	M	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. The site will encourage sustainable use of materials through the use of recycled aggregated and materials

<b>Site Name</b>	Sweetwater							
<b>Site Capacity</b>	775							
<b>Site Source</b>	New allocation – LLDC Local Plan allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites at Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf, as well as other East Wick and Sweetwater development phases outside of the borough.</p> <p><b>IIA1/2:</b> If construction of this site and the other allocated sites at Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune and Wharf and other phases of the East Wick and Sweetwater development were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and other East Wick and Sweetwater phases, and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites, as well as other East Wick and Sweetwater development phases outside of the borough, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increases in the loss of heritage assets and buried archeology from both this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites as well as other East Wick and Sweetwater development phases outside of the borough.</p> <p><b>IIA14:</b> If construction of this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf and other East Wick and Sweetwater phases of development were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites as well as other East Wick and Sweetwater development phases outside of the borough is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate, Neptune Wharf sites and other East Wick and Sweetwater phases are likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA13:</b> The application of policy CG6, CG7 and CG8 will help to preserve water quality and mitigate impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15/16:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Teviot Estate

Table G-21 – Teviot Estate

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The site will provide 1,200 new residential units, which will work positively towards achieving the borough's housing target. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site aims to provide additional facilities, including community and faith facilities, as well as a new primary school. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. As well as housing, the site includes community and faith facilities, and supports urban greening through provision improvements to parks and open spaces at Langdon Park and Uamvar Street, as well as encouraging improvements to the public realm. The site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. The site will reduce levels of health inequalities and provide new facilities which will improve wellbeing and reduce levels of loneliness. The development of new primary school provision, including playing fields and sports facilities is likely to improve the health and wellbeing of children around the site and Leaside area, providing play and educational facilities.
<b>IIA3: Economy &amp; Town Centres</b>	+	L	D	L	I	P	LT	The site is near Empson Street SIL, one of London's main reservoirs of industrial and related capacity, and is adjacent to Barratt Industrial Estate, a Locally Significant Industrial Site. The site will aim to cluster of local retail and community uses could be reprovided along Zetland Street from the current location on Teviot Street, which may provide some additional employment opportunities, however, these are unlikely to be significant. .employment opportunities and town centres.
<b>IIA4: Employment &amp; Skills</b>	+	L	D	R	I	P	LT	The site is well located close to Empson Street SIL, <1 km from Canary Wharf Major Centre, and the Isle of Dogs Activity Area, providing opportunities for access to employment. However, it is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	+	H	D	R	I	P	LT	The provision of 1200 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and

<b>Site Name</b>	Teviot Estate							
<b>Site Capacity</b>	1200							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Some access is available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 2 and 4. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision, however improved infrastructure is a proposed feature of the scheme.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on site and the current capacity of these facilities. There is potential for essential services to be stretched by a population increases. This may conversely increase the need to travel. Details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is adjacent to the River Thames and Tidal Tributaries SINC and adjacent to areas of priority habitat including mudflat. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. Some new green spaces and play parks will be provided, but this will be small scale and at this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	L	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. There are proposals to create new green and play spaces which will deliver enhancements to the character and appearance of the surrounding area.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, partially within the Langdon Park Conservation Area, and adjacent to the Limehouse Cut Conservation Area. It is therefore anticipated that the built form will protect and enhance the setting of heritage assets. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is partially located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. The site gives no detail as to how it intends to manage the flood risk of the area, however any measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the Limehouse Cut. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts.

<b>Site Name</b>	Teviot Estate							
<b>Site Capacity</b>	1200							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	M	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are high. Development specific climate resilience measures are not known at this stage. The addition of GI will help to alleviate the UHI effect, but more specific climate resilient design measures are not known at this time.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Ailsa Street, Aberfeldy Estate and Chrisp Street. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archology from both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site is likely to result in a significant cumulative increase in embodied</p>							

<b>Site Name</b>	Teviot Estate							
<b>Site Capacity</b>	1200							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.							
	<b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Ailsa Street, Aberfeldy Estate and Chrisp Street is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA13:</b> Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-22 – Aspen Way

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	M	D	R	I	P	LT	The site will provide 780 new residential units, which will work positively towards achieving the borough's housing target. However, it is not known whether there will be provision made for wheelchair adaptable homes. It is assumed that the site will meet the minimum 35% target of affordable homes. The site is within the 20-30% most deprived Lower Super Output Areas (LSOAs) in the borough so affordability should be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will also include additional community facilities, including sports, cultural and a college. Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD, which aims to address the social, economic and environmental disparities between Poplar and Canary Wharf.
<b>IIA2: Human Health</b>	+	M	D		I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and is directly adjacent to Poplar Recreation Ground, however, health deprivation is high and life expectancy is worse than the national average for males and females. It is not clear whether the current healthcare provision will meet the needs of the new population. However, the additional provision of community facilities, college and football pitches will contribute to improving the public realm and community facilities around the site. Additionally, reprovisioning the football pitches will encourage physical activity and improve health, particularly amongst children and young people.
<b>IIA3: Economy &amp; Town Centres</b>	+	L	D	L	I	P	LT	The finer details of the development are not yet known; however the site is allocated for mixed use development and compatible commercial uses, which will include SME and retention of the existing Docklands Light Railway (DLR) depot. The site will improve and enhance connectivity between business clusters and the housing market.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	L	I	P	LT	The site is well located to existing employment areas, within the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. The proposal of mixed-use development to include commercial uses will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	+	H	D	R	I	P	LT	The provision of 780 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.

<b>Site Name</b>	Aspen Way							
<b>Site Capacity</b>	780							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions. The addition of sustainable transport provision could reduce the number of vehicles on the borough's roads, thus supporting road safety measures to reduce the numbers of victims killed and seriously injured (KSI) on roads.
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail, with Poplar DLR station within the site. It is uncertain if there are plans for additional transport provision. This is reflected by the site having a PTAL scores ranging between 3 and 5. However, the site includes improved walking and cycling connections to the surrounding area, including: Poplar DLR station, Poplar High Street, East India Dock Road and Canary Wharf Station. There are also proposed improvements to the pedestrian crossing over Aspen Way as part of the development.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. Active travel is encouraged with direct access to the National Cycle Network. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+	L	D	L	R	P	MT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. The provision of strategic open space along with a public square green grid improvements, will help to increase biodiversity and natural capital on site.
<b>IIA10: Landscape &amp; Townscape</b>	++	H	D	R	R/I	P/T	ST/LT	The current landscape/ townscape is of a low quality. The proposed site aims to create a positive sense of place with a public square and public green open space that integrates north-south links and Poplar DLR station, and improve the quality of spaces around and between buildings and movement through the area.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is partially located within both Poplar and Isle of Dogs APA, and partially within St Matthias' Church Conservation Area. It is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II New City College within the site, as well as multiple adjacent listed buildings. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a Flood Risk Area. The site is low lying and therefore has a greater probability of flooding. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface

<b>Site Name</b>	Aspen Way							
<b>Site Capacity</b>	780							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								water and enable discharge into the docks to the south. However, no details are understood relating to the specific measures this will include, or any additional flood risk mitigation.
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has substandard air quality but provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	Overall climate risk is medium and overall heat risk is high. Development specific climate resilience measures are not known at this stage, but the incorporation of green spaces and GI will help to reduce the UHI effect. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site North Quay and Billingsgate Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the North Quay and Billingsgate Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the North Quay and Billingsgate Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p>							

<b>Site Name</b>	Aspen Way							
<b>Site Capacity</b>	780							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the North Quay and Billingsgate Market site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the North Quay and Billingsgate Market site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the North Quay and Billingsgate Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site North Quay and Billingsgate Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

## Billingsgate Market

Table G-23 – Billingsgate Market

<b>Site Name</b>	Billingsgate Market							
<b>Site Capacity</b>	3,000							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	+	M	D	L	I	P	LT	<p>The site has potential to provide approximately 3000 homes, which will work positively towards achieving the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known. It is also not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.</p> <p>Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD, which aims to address the social, economic and environmental disparities between Poplar and Canary Wharf.</p>
<b>IIA2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, including sports facilities. It is not clear whether the current provision will meet the needs of the new population. There is limited information on the level of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, it is expected the scheme will deliver open space, a community centre and retail complexes which will help to promote active and healthy lifestyles.</p>
<b>IIA3: Economy &amp; Town Centres</b>	+/-	M	D	L	I	P	LT	<p>The site will prioritise mixed use development, and there is an allowance for employment on-site, including strategic office space with supporting uses such as gyms, hotels, restaurants and retail, along with compatible commercial uses, including SME, as well as industrial floorspace. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is adjacent to Canary Wharf Major Centre, and so it is imperative that development does not impact on the function of this retail centre. As part of the development, relocation of the wholesale market is required, the UK's largest inland fish market. Therefore, re-provision must be suitable to ensure it continues its legacy.</p>
<b>IIA4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	<p>The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

<b>Site Name</b>	Billingsgate Market							
<b>Site Capacity</b>	3,000							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	+	H	D	R	I	P	LT	The provision of 3000 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, overground, underground and rail, with multiple Docklands Light Railway (DLR) stations nearby. The site has a PTAL score of between 4 and 5. Active travel is also encouraged via the London Cycle Network. It is uncertain if there are plans for additional transport provision.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has good access to transport, facilities and services. The development has aspiration for pedestrian and cycling priority access along a new dockside promenade, further facilitating active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	-	M	D	L	R	T	ST	The site is located adjacent to areas of mudflat priority habitat, along with a few SINCs, including Millwall and West India Docks SINC, Blackwall Basin SINC, and Poplar Dock SINC. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	I	P	LT	The site is located in close proximity to Local Open Space and is within the Tall Building Zone and the Canary Wharf Strategically Important Skyline. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Heights and layout will ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from north. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II accumulator tower on the west side of Poplar Dock, within the site. Design principles will need to protect or enhance the accumulator tower. Coldharbour Conservation Area and the safeguarded Northumberland Wharf are located near to the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During

<b>Site Name</b>	Billingsgate Market							
<b>Site Capacity</b>	3,000							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site is predominantly located within Flood Zone 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface water and enable discharge into the docks to the south.
<b>IIA13: Water Quality</b>	-	H	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. The management of surface water and the enablement of discharge into the docks to the south of the site, may also impact on water quality. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	M	D	L	I	P	LT	Overall climate and heat risk is medium-high. Climate resilience measures such as GI, SuDs etc are not known at this stage. Measures to reduce the risk of overheating will need to be considered. The incorporation of accessible open space and GI may help to reduce the UHI effect.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Billingsgate Market							
<b>Site Capacity</b>	3,000							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Aspen Way and North Quay. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Aspen Way and North Quay site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Aspen Way and North Quay site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Aspen Way and North Quay site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Aspen Way and North Quay site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Aspen Way and North Quay site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Aspen Way and North Quay is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA11:</b> Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p>							

<b>Site Name</b>	Billingsgate Market							
<b>Site Capacity</b>	3,000							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p><b>IIA13:</b> Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

# Crossharbour

Table G-24 – Crossharbour

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The site has potential to provide approximately 2500 homes. However, at this stage, it is not known how many of these units will be affordable and wheelchair adaptable. The site has good existing access to most community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including educational provision, health and community facilities.
<b>IIA2: Human Health</b>	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. The site will deliver new community facilities and NHS services and so it is expected that improvements to health and wellbeing will be delivered. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The Crossharbour site is defined as a primary shopping area. The development is expected to create a new town centre with provision for a variety of retail, leisure and community uses. The inclusion of ground floor active uses will support town centre viability and changing retail patterns, integration with residential development will improve and enhance connectivity between business clusters and the housing market.
<b>IIA4: Employment &amp; Skills</b>	+	M	D/I	L	I	P	LT	The site will include retail space, as well as other leisure and community uses which is considered to provide employment opportunities. It is anticipated that other comparable uses may come forward which could include other employment spaces. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 2500 new homes will help towards meeting LBTH's housing target. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
<b>IIA6: Crime &amp; Safety</b>	+	L	D/I	L	I	P	LT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.

<b>Site Name</b>	Crossharbour							
<b>Site Capacity</b>	2,500							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network. There is poor access to the underground at the site. This is reflected in the site having a PTAL level of between 2-4. The site is expected to improve walking and cycling connections, and the provision of a bus interchange which will support new sustainable transport options for future population growth. The site is well located to local facilities and services which will allow residents to live their lives more locally.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D/I	L	R/I	P/T	MT/LT	The site is adjacent to deciduous woodland and borders the Mudchute Park Farm Local Nature Reserve. The site is also located in close proximity to a number of SINCs, with Mudchute Farm and Park SINC located on the border of the site. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI; however it is unknown whether the site will be in line with BNG targets.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is adjacent to an area of Local Open Green Space (Mudchute Farm and Millwall Park), the site is also situated in the Millwall Inner Dock Cluster Tall Buildings Zone. It is therefore expected that the development of the site will respond to the existing character of the surrounding built environment, taking into particular consideration the massing of the surrounding area. The site will incorporate GI as part of the design including the increase in public realm and public open spaces.
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. Consideration should be given to ensure there is no impact on the setting of the historic docks and Maritime Greenwich World Heritage Site to the South, and the adjacent listed building, the Carnegie Library. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.

<b>Site Name</b>	Crossharbour							
<b>Site Capacity</b>	2,500							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site has fairly good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, specific climate resilience design measures are unknown, but the inclusion of GI may help to alleviate the UHI effect
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational however it is expected that the development could demonstrate potential to connect to the Barkantine Energy Centre. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Samuda Estate and Limeharbour.</p> <p><b>IIA1/2:</b> If construction of this site and the Samuda Estate and Limeharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Samuda Estate and Limeharbour sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Samuda Estate and Limeharbour sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on townscape in combination with neighbouring sites Samuda Estate and Limeharbour.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archaeology from both this site and the Samuda Estate and Limeharbour site.</p> <p><b>IIA14:</b> If construction of this site and the Samuda Estate and Limeharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Samuda Estate and Limeharbour sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Samuda Estate and Limeharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Samuda Estate and Limeharbour sites are likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Crossharbour							
<b>Site Capacity</b>	2,500							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

# Limeharbour

Table G-25 – Limeharbour

<b>Site Name</b>	Limeharbour							
<b>Site Capacity</b>	1900							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped-pending decision)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	+	H	D	L	I	P	LT	The site has potential to provide approximately 1900 homes. The number of affordable homes for the entire site is not currently realised. It is expected that 35% affordable housing could be provided. 10% of units will be designed to be wheelchair accessible. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. At this location, issues of overcrowding are higher than the borough average and so it is important to ensure that the provision of services will help to support the changing demographic.
<b>IIA2: Human Health</b>	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, the site is within the 30-50% most deprived in terms of health. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
<b>IIA3: Economy &amp; Town Centres</b>	+/-	M	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is adjacent to the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre.
<b>IIA4: Employment &amp; Skills</b>	++	M	D	L	I	P	LT	Limehouse is well located to existing employment areas including the Isle of Dogs Activity Zone. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has capacity to provide approximately 1900 homes, which will provide a net increase in the number of dwellings within the borough. The number of affordable homes for the entire site is not currently realised. It is expected that 35% affordable housing could be provided. 10% of units will be designed to be wheelchair accessible. The size, type and tenure of housing will need to take into account different groups in the community, and it is

<b>Site Name</b>	Limeharbour							
<b>Site Capacity</b>	1900							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped-pending decision)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								expected that the site will maximise the provision of family homes. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
<b>IIA6: Crime &amp; Safety</b>	+	L	D/I	L	I	P	LT	Currently, the site scores within the 30-50% most deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site has average access to public transport, as reflected in a PTAL score between 3-4, the site is situated within reasonable proximity to bus stops and underground and overground stations. Improvements to cycling and walking connections to, from and within the site are assumed including to the wider area's employment and amenity spaces. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
<b>IIA8: Accessibility</b>	+	L	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to the legibility of the site will improve the accessibility of the site. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D/I	L	R/I	P/T	MT/LT	The Mudchute Park Farm Local Nature Reserve is located approximately 0.5km to the south of the site, and mud flat priority habitats are located to the east. There are also a number of SINCs located within close proximity of the site. There is a potential for a negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI..
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The Canary Wharf Area Strategically Important Skyline is situated to the North of the site, and the site itself is within the boundaries of the Millwall Inner Dock Cluster Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

<b>Site Name</b>	Limeharbour							
<b>Site Capacity</b>	1900							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped-pending decision)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich World Heritage Site to the South. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, however, levels of NO <sub>2</sub> are >28-43µ/m <sup>3</sup> . The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. Measures are expected to be implemented in the design of buildings to minimise the effects of heating and cooling including a range of planting to improve the GI provision.
<b>IIA16: GHG Emissions</b>	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that the development could connect to the Barkantine Energy Centre. Energy demand is also expected to be met by using air source heat pumps and a centralised distribution network. Passive design features are expected to improve energy efficiency.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Limeharbour							
<b>Site Capacity</b>	1900							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Existing allocation (undeveloped-pending decision)							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Samuda Estate and Crossharbour.</p> <p><b>IIA1/2:</b> If construction of this site and the Samuda Estate and Crossharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Samuda Estate and Crossharbour sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Samuda Estate and Crossharbour sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on townscape in combination with neighbouring sites Samuda Estate and Crossharbour.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Samuda Estate and Crossharbour site.</p> <p><b>IIA14:</b> If construction of this site and the Samuda Estate and Crossharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Samuda Estate and Crossharbour sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Samuda Estate and Crossharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Samuda Estate and Crossharbour sites are likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Marsh Wall East

Table G-26 – Marsh Wall East

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	L	I	P	LT	The site has potential to provide approximately 2400 homes, which will work positively towards achieving the borough's housing target. Of the 332 residential units currently permitted, 71 are affordable, and 10% will be wheelchair accessible. The site has existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide a small open space, primary school and health facility to meet the needs of groups now, but also the needs of the future population. The site will provide a new primary school and open space, to meet the needs of groups now and in the future.
<b>IIA2: Human Health</b>	++	M	D/I	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and it also expected to deliver further community services and facilities through the provision of new healthcare and new open spaces which will improve access to health services, as well as improve physical and mental health and wellbeing and reduce level of loneliness. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population. Additionally, the site will ensure that the eastern side of the site is suitably mitigated against potential noise from the data centre uses within this area, in line with the Agent of Change principle. This will reduce noise pollution and nuisance, therefore reducing mental stress and improving mental wellbeing.
<b>IIA3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	The South Quay neighbourhood centre is located at the west of the site. The site also falls within the Isle of Dogs Activity Area, and so the provision of residential and employment space within the site is expected to improve and enhance the connectivity between business clusters and the housing market. The site also includes 10,500sqm of retail floorspace which will improve the local economy. However, it is imperative that any retail development does not detrimentally impact on the vitality of the designated retail centre.
<b>IIA4: Employment &amp; Skills</b>	++	M	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. It is assumed that employment space will be delivered as part of the development of the site, and so will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

<b>Site Name</b>	Marsh Wall East							
<b>Site Capacity</b>	2400							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Site partially consented (under construction), remaining existing allocation un-developed							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	++	M	D	L	I	P	LT	The provision of 2400 new homes will help towards meeting LBTH's housing target. Of the 332 residential units currently permitted, 71 are affordable, and 10% will be wheelchair accessible. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
<b>IIA6: Crime &amp; Safety</b>	+	L	D/I	L	I	P	LT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network, this is reflected in the site having a PTAL level of between 3-4. The site is expected to improve walking and cycling connections, and the provision of a bus interchange which will support new sustainable transport options for future population growth. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to cycle and pedestrian access are expected to be delivered as part of the site.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has access to some facilities and services and the proposal includes further provision for community facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D/I	L	R/I	P/T	MT/LT	The site is within close proximity to a mudflat priority habitat and a number of SINCs. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, and it is anticipated that improvements will be made to biodiversity and ecology along the water's edge.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

<b>Site Name</b>	Marsh Wall East							
<b>Site Capacity</b>	2400							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Site partially consented (under construction), remaining existing allocation un-developed							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. The site is also adjacent to the Coldharbour Conservation Area. Any development of the site will need to protect and enhance the setting of heritage assets, including the historic docks and the Maritime Greenwich World Heritage Site. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the Middle and South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. The site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. The development is expected to deliver external landscapes areas to improve GI networks. Buildings will be designed to ensure water efficiency and overheating are mitigated, thus improving overall climate resilience.
<b>IIA16: GHG Emissions</b>	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Passive design and energy efficiency measures are expected to reduce energy demand. Connections for future heat networks are expected to be delivered as part of the site's development. No renewable energy measures are expected to be included within the scheme's design.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

<b>Site Name</b>	Marsh Wall East							
<b>Site Capacity</b>	2400							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Site partially consented (under construction), remaining existing allocation un-developed							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA18: Efficient use of Land</b>	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites .</p> <p><b>IIA1/2:</b> If construction of this site and the Limeharbour and Marsh Wall West sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Limeharbour and Marsh Wall West sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Limeharbour and Marsh Wall West sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on townscape and the strategically important skyline in combination with neighbouring sites Limeharbour and Marsh Wall West.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Limeharbour and Marsh Wall West.</p> <p><b>IIA14:</b> If construction of this site and the Limeharbour and Marsh Wall West sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Limeharbour and Marsh Wall West sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Limeharbour and Marsh Wall West sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Limeharbour and Marsh Wall West sites are likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Marsh Wall West

Table G-27 – Marsh Wall West

<b>Site Name</b>	Marsh Wall West							
<b>Site Capacity</b>	2625 (+1000 student rooms + 800 co-living units)							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	+	H	D	R	I	P	LT	The site will provide 2,625 new homes and has potential to provide at least 1000 new rooms for students and 800 co-living units, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable across the whole site. Given the inclusion of co-living and PBSA some development of the site will not contribute affordable housing. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. These units have the potential to benefit both students and the wider community, by delivering other priorities such as affordable housing. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
<b>IIA3: Economy &amp; Town Centres</b>	+/-	M	D	L	I	P	LT	There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is partially located within the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf Major Centre and primary shopping areas. This will likely improve access for residents to employment opportunities. Employment space delivered as part of the development of the site will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	++	H	D	R	I	P	LT	The site has capacity to provide 2,625 homes, including 1000 student rooms and 800 co-living units which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable across the whole site. Given the inclusion of co-living and PBSA some development of the site will not contribute affordable housing. The inclusion of co-living units is assumed to

<b>Site Name</b>	Marsh Wall West							
<b>Site Capacity</b>	2625 (+1000 student rooms + 800 co-living units)							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								provide more flexible housing and will contribute a range of housing options within the site. It is assumed the site will deliver a proportion of wheelchair adaptable homes.
<b>IIA6: Crime &amp; Safety</b>	+/-	L	I	L	R	P	MT	The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 3 and 5. It is not clear whether there will be plans for additional sustainable transport provision.
<b>IIA8: Accessibility</b>	++	H	D	R	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	L	R	T	ST	The site is adjacent to Millwall and West India Docks SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the inclusion of GI and public realm improvements, could help to provide small scale habitats.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site lies within the Canary Wharf Area Strategically Important Skyline, and within the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within Isle of Dogs Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
<b>IIA12: Flooding</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
<b>IIA13: Water Quality</b>	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems

<b>Site Name</b>	Marsh Wall West							
<b>Site Capacity</b>	2625 (+1000 student rooms + 800 co-living units)							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+	H	D	R	I	P	LT	Overall climate risk is medium and overall heat risk is medium-high. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. Various SuDS, landscaping and design measures to limit overheating are expected to be delivered, which in turn will reduce vulnerability to the impacts of climate change.
<b>IIA16: GHG Emissions</b>	+	H	D	R	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development of the site is expected to maximise energy efficiency through a fabric first approach which will reduce energy demand.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed and brownfield land and will support the protection of the borough's green spaces. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marshwall East and Millharbour. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Marshwall East and Millharbour site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Marshwall East and Millharbour site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive</p>							

<b>Site Name</b>	Marsh Wall West								
<b>Site Capacity</b>	2625 (+1000 student rooms + 800 co-living units)								
<b>Site Source</b>	Existing allocation								
<b>Site Status</b>	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.								
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>	
	<p>cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marshwall East and Millharbour site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Marshwall East and Millharbour site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Marshwall East and Millharbour site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Marshwall East and Millharbour is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>								
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>								

Table G-28 – Millharbour

<b>Site Name</b>	Millharbour							
<b>Site Capacity</b>	1700							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The site will provide 1,700 new residential units, which will work positively towards achieving the borough's housing target. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide a small open space, primary school and secondary school to ensure that the needs of all groups will be met both now and in the future.
<b>IIA2: Human Health</b>	+	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness.
<b>IIA3: Economy &amp; Town Centres</b>	++	M	D	L	I	P	LT	There is an allowance for employment uses including office and retail space as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is partially located within the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf Major Centre and primary shopping areas. This will likely improve access for residents to employment opportunities. Employment space delivered as part of the development of the site will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	+/-	H	D	R	I	P	LT	Housing prices in the ward far exceed the London average. The provision of 1,700 new homes will help towards meeting the borough's housing target. It is expected that 26.6% affordable housing will be delivered. It is expected that 10% of housing units will be accessible and wheelchair adaptable.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is currently located within an area of moderate crime deprivation (predominantly the top 40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

<b>Site Name</b>	Millharbour							
<b>Site Capacity</b>	1700							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site has average access to public transport via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 2 and 4. It is not clear whether there will be plans for additional sustainable transport provision.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	L	R	T	ST	The site is adjacent to Millwall and West India Docks SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the inclusion of GI and public realm improvements, could help to provide small scale habitats
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site lies predominantly within the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within Isle of Dogs Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
<b>IIA12: Flooding</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
<b>IIA13: Water Quality</b>	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative

<b>Site Name</b>	Millharbour							
<b>Site Capacity</b>	1700							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are medium-high. The site is expected to include public realm improvements and additional GI, which could help to alleviate the UHI effect. . Currently, specific climate resilience design are unknown.
<b>IIA16: GHG Emissions</b>	+	H	D	L	I	P	T	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. A range of passive design measures are expected to reduce energy demand. A site wide district heating network is expected to be delivered.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed and brownfield land and will support the protection of the borough's green spaces. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marshwall West and Marshwall East. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Marshwall West and Marshwall East site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Marshwall West and Marshwall East site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marshwall West and Marshwall East site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA15:</b> The increase in open space GI potentially provided by both this site and the Marshwall West and Marshwall East site is likely to increase resilience to the UHI</p>							

<b>Site Name</b>	Millharbour							
<b>Site Capacity</b>	1700							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<p>effect. However, the exact climate resilience measures are not yet known.</p> <p><b>IIA16:</b> The construction of both this site and the Marshwall West and Marshwall East site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Marshwall West and Marshwall East is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p><b>IIA9:</b> In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p><b>IIA12:</b> Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA16:</b> The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-29 – North Quay

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	+	H	D	R	I	P	LT	The site has capacity to provide 1250 homes, which will work positively towards achieving the borough's housing target. It is expected that the site will provide 30% affordable housing, however this falls below the target set in policy. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
<b>I/A2: Human Health</b>	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however no new health facilities are proposed. The development of the site will include open spaces and improvements to public realm, which is expected to improve physical and mental health and wellbeing and reduce levels of loneliness.
<b>I/A3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The site borders the Isle of Dogs Activity Area, and so it is expected that key employment opportunities are available for future residents and will improve and enhance connectivity between business clusters and the housing market. It is expected that development will also deliver gyms, hotels and restaurants to expand the provision of different markets. The site is well located to local retail centres, including the Westferry/Pennyfields neighbourhood parade and the Canary Wharf primary shopping area, and so development is likely to improve footfall to these areas. However, it is imperative that any retail provision within the site does not impact on the vitality of local high streets.
<b>I/A4: Employment &amp; Skills</b>	++	H	D	L	I	P	LT	Employment and income deprivation is low in the area, as reflected in the proximity to the Isle of Dogs Activity Area. The development of the site is expected to provide additional employment space through the delivery of mixed-use development and extend the existing good access to jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>I/A5: Housing</b>	+	H	D	L	I	P	LT	The site has capacity to provide 1250 new homes. The site is amongst the most deprived in terms of barriers to housing, and house prices. It is expected that the site will provide 30% affordable housing, however this falls below the target set in policy HF2. The site is expected to deliver 10% accessible homes within the affordable rented tenure and 10% within the immediate sector.
<b>I/A6: Crime &amp; Safety</b>	++	L	D/I	L	I	P	LT	The site is expected to deliver improvements to public realm, including the provision of open spaces, and the creation of a green grid. Active frontages are also expected to be a key feature of the site which will improve natural surveillance within the site and in turn improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles.

<b>Site Name</b>	North Quay							
<b>Site Capacity</b>	1250							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site has average to good access to public transport, as reflected in a PTAL score between 4-5, and is situated within good proximity to bus stops and underground and overground stations. Improvements are expected to include a pedestrian route and enhancement of the Aspen Way pedestrian bridge to connect to the wider movement network and the DLR and underground stations adjoining the site are expected to promote the use of existing public transport provision. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has good access to facilities and services. Improvements to pedestrian routes within the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	L	R/I	P/T	MT/LT	The site is located less than 0.8km from an area of mudflat priority habitats. The site is adjacent to the Millwall and West India Docks SINC. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, however it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site lies within the Canary Wharf Area Strategically Important Skyline, and within the Tall Building Zone. Development of the site is, therefore, expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is located adjacent to the West India Dock Conservation Area, and the quay walls to the dock to the south of the site are Grade I listed. The site also falls within the Isle of Dogs Archaeological Priority Area. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is predominantly located within Flood Zone 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface water and enable discharge into the docks to the south.

<b>Site Name</b>	North Quay							
<b>Site Capacity</b>	1250							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA13: Water Quality</b>	-	H	D	L	R/I	P/T	ST/LT	The site is located in close proximity to North Dock. There is potential for increased surface runoff during construction, further polluting this watercourse. The management of surface water and the enablement of discharge into the docks to the south of the site, may also impact on water quality. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements will also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption.
<b>IIA15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, full climate resilience measures are unknown. The addition of more GI and open space will help to reduce the UHI effect. SuDS and rainwater harvesting is expected to be integrated into buildings and the public realm.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that measures to improve energy efficiency of buildings will be included, as well as the use of renewable energy technologies will be delivered at the site.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	North Quay							
<b>Site Capacity</b>	1250							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Aspen Way and Billingsgate Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Aspen Way and Billingsgate Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p><b>IIA5:</b> In combination, this site and the Aspen Way and Billingsgate Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p><b>IIA10:</b> If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archaeology from both this site and the Aspen Way and Billingsgate Market site, resulting in a negative residual effect.</p> <p><b>IIA14:</b> If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p><b>IIA16:</b> The construction of both this site and the Aspen Way and Billingsgate Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Aspen Way and Billingsgate Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA12:</b> Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p>							



<b>Site Name</b>	North Quay							
<b>Site Capacity</b>	1250							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
	<b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP. <b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.							

Table G-30 – Reuters

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The site has capacity to provide 900 homes, which will work positively towards achieving the borough's housing target. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site is located within an area of high population density (>15,695p/h). However, the site also includes space for additional community facilities, including a primary school and nursery.
<b>IIA2: Human Health</b>	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however no new health facilities are proposed. The development of the site will include landscaping and improvements to public realm, which is expected to improve physical and mental health and wellbeing and reduce levels of loneliness.
<b>IIA3: Economy &amp; Town Centres</b>	++	H	D	R	I	P	LT	The proposed site includes mixed use development, including commercial, business, communal and public house spaces. The site will improve and enhance connectivity between business clusters and the housing market. The site is also well located close to existing town centres and economic hubs.
<b>IIA4: Employment &amp; Skills</b>	+	M	D	R	I	P	LT	The site is located 500m from the existing employment area of the Isle of Dogs Activity Area and a locally significant industrial site. The site also includes space for additional employment space. The construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	++	H	D	L	I	P	LT	The site has capacity to provide 900 new homes. The site is amongst the most deprived in terms of barriers to housing, and house prices. It is expected that the site will provide 30% affordable housing, however this falls below the target set in Policy HF2. However, the site includes a range of housing type and tenures. It is assumed the site will deliver a proportion of accessible homes.
<b>IIA6: Crime &amp; Safety</b>	+/-	M	D/I	L	I	P	LT	The site is expected to deliver improvements to public realm, including the provision of open spaces, and the creation of a green grid. Active frontages are also expected to be a key feature of the site which will improve natural surveillance within the site and in turn improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles. However, the inclusion of a public house space at the site has the potential to result in increases in anti-social behaviour, particularly during night time hours. There is also the potential for this use to increase the fear of crime in the local community.
<b>IIA7: Sustainable Transport</b>	++	H	D	L	I	P	LT	The site has average access to public transport, as reflected in a PTAL score of 3, and is situated within good proximity to bus stops and underground and overground stations. Improvements are expected to include walking and cycling connections to connect to the

<b>Site Name</b>	Reuters							
<b>Site Capacity</b>	900							
<b>Site Source</b>	Existing Allocation							
<b>Site Status</b>	Consented							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								wider network. Development at the site will also be accompanied by the delivery of a new riverbus station. This will improve access to the site and surrounding area. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
<b>IIA8: Accessibility</b>	++	M	D	L	I	P	LT	The existing site has good access to facilities and services. Improvements to pedestrian routes within the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D	L	R	P	MT	The site is adjacent to the River Thames and Tidal Tributaries SINC and in close proximity to the Saffron Avenue Pond SINC. The site also borders an area of priority habitat for mudflats. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site has potential to contribute to biodiversity along within landscaping and open spaces, which could help to provide new small-scale habitats.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	I	P	LT	The site is located within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. There are also two areas of open space located in close proximity to the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Blackwall APA. There are also a small number of heritage assets located around the site. The Naval Row conservation area is also located 80m north of the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site is located within an area of Flood Zone 3 and a flood risk zone, and is directly adjacent to the River Thames. The site is low lying and therefore has a greater probability of flooding. However, development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse.

<b>Site Name</b>	Reuters							
<b>Site Capacity</b>	900							
<b>Site Source</b>	Existing Allocation							
<b>Site Status</b>	Consented							
<b>I/A Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
<b>I/A14: Air Quality</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>I/A15: Climate Change &amp; Resilience</b>	-	H	D	L	I	P	LT	The site is located in an area of medium high overall climate risk and medium heat risk rating. The site is also located within an area of flood zone 3, and has a diminishing resilience to climate change. Design measures have been incorporated to mitigate impacts of overheating. Green and blue infrastructure is expected to be delivered across the site. At this stage, it is understood that SuDS will be incorporated, however final details are yet to be confirmed. At this stage, climate resilience measures are unknown.
<b>I/A16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>I/A17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>I/A18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The site is located on brownfield land. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Reuters								
<b>Site Capacity</b>	900								
<b>Site Source</b>	Existing Allocation								
<b>Site Status</b>	Consented								
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>	
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the Republic Estate site.</p> <p><b>IIA1/2:</b> If construction of this site and the Republic Estate site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Republic Estate site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Republic Estate site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Republic Estate site.</p> <p><b>IIA14:</b> If construction of this site and the Republic Estate site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and surrounding sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Republic Estate site are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and the neighbouring site Republic Estate site are likely to result in a cumulative increase in waste.</p>								
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA12/13:</b> Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>								

Table G-31 – Riverside South

<b>Site Name</b>	Riverside South							
<b>Site Capacity</b>	1650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented for office development, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	+	H	D	R	I	P	LT	The site has potential to provide approximately 1,650 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site is situated in a least deprived area (10-20%) and has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
<b>IIA2: Human Health</b>	+	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is moderate with the site being situated in the top 30-50% of most deprived neighbourhoods nationally. There is limited information on the level of additional community infrastructure. However, it is expected the scheme will deliver a new community centre and retail complexes which will promote active and healthy lifestyles.
<b>IIA3: Economy &amp; Town Centres</b>	+	H	D	R	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area and Canary Warf Major Centre. This will likely improve access for residents to employment opportunities. There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	R	I	P	LT	Riverside South is well located to existing employment areas including the Isle of Dogs Activity Zone. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has capacity to provide approximately 1,650 homes, which will provide a net increase in the number of dwellings within the borough. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, and it is expected that the site will maximise the provision of family homes. It is important that affordability is taken into account, particularly considering the significant barriers to housing (10-20% most deprived with house prices exceeding London Average) within the locality.

<b>Site Name</b>	Riverside South							
<b>Site Capacity</b>	1650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented for office development, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	L	D/I	L	R/I	P/T	LT	Currently, the site sits within the 10-20% least deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community. Additionally, the development will provide appropriate riparian lifesaving infrastructure along the riverside path, improving user safety.
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site has good access to public transport, as reflected in a PTAL score of 5, the site is situated within reasonable proximity to bus stops, underground and overground stations, as well as the national and London cycle networks. Improvements to cycling and walking connections to, from and within the site are expected including to the wider area's employment and amenity spaces. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
<b>IIA8: Accessibility</b>	++	L	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to the legibility of the site will improve the accessibility of the site. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the southwest of the site so there is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	L	I	P	LT	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II Historic Lock south of the site, the Grade II listed building also south of the site and a Grade II listed gate North-East of the site. Two conservation areas are located within 0.4km North of the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting

<b>Site Name</b>	Riverside South							
<b>Site Capacity</b>	1650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented for office development, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site is located within an area of Flood Zone 3 and a flood risk zone, and is directly adjacent to the River Thames. The site is low lying and therefore has a greater probability of flooding. However, development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse.  In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a low-medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. At this stage, specific climate resilience design measures are unknown.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Riverside South							
<b>Site Capacity</b>	1650							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented for office development, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Westferry and Park Place and 10 Bank Street as well as other developments within Canary Warf</p> <p><b>IIA1/2:</b> If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Westferry and Park Place and 10 Bank Street sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Westferry and Park Place and 10 Bank Street sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring sites Westferry and Park Place and 10 Bank Street.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Westferry and Park Place.</p> <p><b>IIA14:</b> If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Westferry and Park Place and 10 Bank Street sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Westferry and Park Place and 10 Bank Street sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Westferry and Park Place and 10 Bank Street sites are likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA12:</b> Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Westferry Printworks

Table G-32 – Westferry Printworks

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	L	I	P	LT	The site has potential to provide approximately 950 homes. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide open space and additional educational infrastructure through a secondary school.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver open space which will promote active and healthy lifestyles and reduce social isolation.
IIA3: Economy & Town Centres	+	M	D	R	I	P	LT	The site is within the most deprived in terms of income. The site is expected to deliver mixed use development including a range of employment spaces to meet the needs of various sizes of businesses. The site is also situated in close proximity to the Isle of Dogs Activity Area, which will improve connectivity between residential uses and business clusters. Given that the site is not located in a designated retail centre, imperative that the any uses do not impact on the viability of nearby town centres.
IIA4: Employment & Skills	+	M	D	R	I	P	LT	The site is expected to provide access employment opportunities for residents. This is expected to include a range of employment spaces to meet the needs of various sizes of businesses. The Site is also within close proximity to the Isle of Dogs Activity Area, which will improve access to a range of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide approximately 950 homes, which will work positively towards achieving the borough's housing target. Further details on the level of affordable and accessible housing is required.
IIA6: Crime & Safety	+	L	D/I	L	R	P	LT	The site is within the 30-50% most deprived neighbourhoods nationally with regards to crime. The site is expected to improve public realm and provide additional open spaces which should increase natural surveillance and therefore reduce crime and fear of crime.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	The site is in good proximity to local bus stops and rail links, however there is limited access to underground links, and poor connectivity to cycle networks, this is reflected in the PTAL score of between 1b-2. It is expected that walking and cycling connections to, from and within the site will improve sustainable transport links and reduce car dependency within the local area.

<b>Site Name</b>	Westferry Printworks							
<b>Site Capacity</b>	950							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA8: Accessibility</b>	+	L	D	L	I	P	LT	The exiting site has good access to facilities and services, and new community infrastructure is proposed, so residents will be able to live more locally and reduce their need to travel. Development at the site is expected to ensure connectivity to existing infrastructure.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	There are no statutory or non-statutory designated sites located within the site area. Mudflats (priority habitats) are located approximately 0.1km to the south west of the site and the site is adjacent to the Millwall and West India Docks SINC. There is potential for some adverse effects during construction, however increased green space is proposed as part of the development which will improve urban greening and provide GI
<b>IIA10: Landscape &amp; Townscape</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated within the Millwall Inner Cluster TBZ. It is expected that development will respond positively to the existing character of the surrounding built environment and its dockside location, however finalised details of this have not currently been realised. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. The site is adjacent to the Queen Mother Gardens and Sir John McDougall Gardens, it is assumed the built form will respect these open spaces in regards to their scale.
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA, and will be visible from some areas of the Chapel House conservation area, the site is outside the buffer zone of the Maritime World Heritage Site, but may impact on its setting. The built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, the site will also provide an outfall for surface water drainage into the docks.
<b>IIA13: Water Quality</b>	-	H	D/I	L	I	P/T	ST/LT	The site is located adjacent to Millwall Dock. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse.  In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.

<b>Site Name</b>	Westferry Printworks							
<b>Site Capacity</b>	950							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Millharbour South.</p> <p><b>IIA1/2:</b> If construction of this site and the Millharbour South site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Millharbour South site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Millharbour South site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on the townscape in combination with neighbouring site Millharbour South.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Millharbour South.</p> <p><b>IIA14:</b> If construction of this site and the Millharbour South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Millharbour South site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Millharbour South site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Millharbour South is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Westferry Printworks							
<b>Site Capacity</b>	950							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, un-developed.							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA12/13:</b> Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-33 – Wood Wharf

<b>Site Name</b>	Wood Wharf							
<b>Site Capacity</b>	3600							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	++	H	D	R	I	P	LT	The site will provide up to 3,600 new homes, of which at least 25% will be affordable and the development will include at least 10% wheelchair adaptable homes .In addition, there will be new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
<b>IIA2: Human Health</b>	++	H	D	R	I	P	LT	The site is located in an area with an overall moderate health deprivation (30-50% most deprived). As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and it also expected to deliver further community services and facilities through the provision of new healthcare and new open spaces which will improve access to health services, as well as improve physical and mental health and wellbeing and reduce level of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to be delivered. The site will deliver new community facilities and services and so it is expected that it will facilitate improvements to health and wellbeing. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
<b>IIA3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	The South Quay neighbourhood centre is located at the west of the site. The site also falls within the Isle of Dogs Activity Area and Canary Wharf Major Town Centre, and so the provision of residential and employment space within the site is expected to improve and enhance the connectivity between business clusters and the housing market. It is not anticipated that retail development will be a feature of the site, however it is imperative that any retail development does not detrimentally impact on the vitality of the designated retain centre.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf town centre and primary shopping areas. This will likely improve access for residents to employment opportunities. It is assumed that employment space will be delivered as part of the development of the site, and so will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

<b>Site Name</b>	Wood Wharf							
<b>Site Capacity</b>	3600							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA5: Housing</b>	+	M	D	L	I	P	LT	The provision of 3,600 new homes will help towards meeting LBTH's housing target The site will provide up to 3,600 new homes, of which at least 25% will be affordable and the development will include at least 10% wheelchair adaptable homes The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown.
<b>IIA6: Crime &amp; Safety</b>	+	M	D/I	L	R/I	P/T	ST/LT	The site is situated within a 30-50% most deprived area in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
<b>IIA7: Sustainable Transport</b>	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network, this is reflected in the site having a PTAL level of between 3-6a. The site is expected to improve walking and cycling connections, which will support new sustainable transport options for future population growth, The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to cycle and pedestrian access are expected to be delivered as part of the site.
<b>IIA8: Accessibility</b>	++	H	D	L	I	P	LT	The existing site has access to some facilities and services and the proposal includes further provision for community facilities and services. In addition, the site will be provisioning a new primary school and GP surgery thus increasing the allowance for residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	L	D/I	L	R/I	P/T	MT/LT	The site is within close proximity to a mudflat priority habitat. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, and it is anticipated that improvements will be made to biodiversity and ecology along the water's edge. However, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

<b>Site Name</b>	Wood Wharf							
<b>Site Capacity</b>	3600							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA11: Historic Environment</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs Archaeological Priority Area. The site is also adjacent to the Coldharbour Conservation Area and sits directly on the grade 1 Blackwall Basin. Any development of the site will need to protect and enhance the setting of heritage assets, including the historic docks and the Maritime Greenwich World Heritage Site. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	+	H	D/I	L	I	P	LT	The site is located within flood zone 2 and 3. The development of the site is supported by a Flood Risk Assessment (FRA) and will or has the capacity to raise site level defences to 6.2m AOD. Accordingly, it is considered flood risk can be adequately mitigated.
<b>IIA13: Water Quality</b>	+/-	H	D	L/R	I	P	ST/LT	Storm water discharge from buildings and promenades would be discharged into the docks where possible. This is more sustainable than discharging into the sewer system as the trunk sewer in Preston's 155 Road is combined. In addition, it would also increase the risk that combined sewer overflows (CSO's) would discharge foul sewerage into the River Thames during storm events. Conditions will ensure that run-off from the road network are appropriately attenuated to ensure that pollutants do not enter the dock system. However, there is potential that construction at the site may result in contamination of this water body as a result of surface runoff. The site will include opportunities for greywater re-use. If implemented, this could contribute to improving the water efficiency of the site.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. The site provides new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+	H	D	R	I	P	T	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. The site will deliver SuDS, green spaces will be used within the development to reduce the UHI effect. The design of the scheme is expected to minimise the effects of solar gains and the UHI effect by virtue of scale, massing and layout.

<b>Site Name</b>	Wood Wharf							
<b>Site Capacity</b>	3600							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA16: GHG Emissions</b>	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Heating will be delivered using a site wide energy network served by a combined heat and power system. Solar PV will be incorporated into the construction of buildings. Energy efficiency design measures will minimise the energy demand of the site.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites.</p> <p><b>IIA1/2:</b> If construction of this site and the Canada Square and Churchill Place and Billingsgate Market sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Canada Square and Churchill Place and Billingsgate Market sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Canada Square and Churchill Place and Billingsgate Market sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on townscape and the strategically important skyline in combination with neighbouring sites Canada Square and Churchill Place and Billingsgate Market.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Canada Square and Churchill Place and Billingsgate Market sites.</p> <p><b>IIA14:</b> If construction of this site and the Canada Square and Churchill Place and Billingsgate Market sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Canada Square and Churchill Place and Billingsgate Market sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Canada Square and Churchill Place and Billingsgate Market sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites, Canada Square and Churchill Place and Billingsgate Market, are likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Wood Wharf							
<b>Site Capacity</b>	3600							
<b>Site Source</b>	Existing allocation							
<b>Site Status</b>	Consented, under construction							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-34 – 10 Bank Street

<b>Site Name</b>	10 Bank Street							
<b>Site Capacity</b>	575							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>I/A Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>I/A1: Population &amp; Equalities</b>	+	M	D	R	I	P	LT	The site has potential to provide approximately 575 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including health and community facilities. However, the closest secondary school is 1.35km away and requires crossing the river using Canary Wharf underground or ferry links.
<b>I/A2: Human Health</b>	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and leisure facilities; however, health deprivation is in the top 30-50% nationally. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver pocket parks, which will provide publicly accessible open space, improving wellbeing for the local community.
<b>I/A3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	The site is within the 30-50% most deprived nationally in terms of income. The site is located within Canary Warf Major Town Centre and is in close proximity to the Isle of Dogs Activity Area and Canary Warf primary shopping areas. The site will also include retail space within the development. This will improve proximity and availability of town centre uses within the development. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area.
<b>I/A4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	The site is expected to provide access employment opportunities for residents. This is expected to include a range of employment spaces, including office and retail space. The site is well located to existing employment areas including the Canary Warf Major Town Centre, the Isle of Dogs Activity Area and Canary Warf primary shopping areas. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>I/A5: Housing</b>	+	H	D	R	I	P	LT	The provision of 575 new homes will help towards meeting LBTH's housing target. However, it is unclear what proportion of homes will be made affordable and the size, type and tenure of homes. It is assumed that the site will provide 35% affordable housing, meeting the minimum target.

<b>Site Name</b>	10 Bank Street							
<b>Site Capacity</b>	575							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	I	P	LT	The site is located within an area of low crime deprivation (10%-20% least deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	L	D	L	I	P	LT	The site has good connectivity via public transport through bus and overground and underground rail. This is reflected in the PTAL score of between 5 and 6a. The site is also close to the national and London cycle networks. The site will also improve the walking and cycling connections to the South Dock from the site and create additional public access routes on the east and west, as well as between Middle and South Docks.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	-	L	I	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the northwest of the adjacent site, Riverside South, so there is a potential negative effect on ecology as a result, particularly from noise and dust spoiling during construction. However, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D	L	R/I	P	LT	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings is currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Isle of Dogs APA, so it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade 2 Historic Lock south of the Riverside South site, the Grade 2 listed building also south of Riverside South and a Grade 2 listed gate at Wesferry/Park Place. Two conservation areas are located within 0.7km North of the site. It is therefore pertinent that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. It is unknown whether there will be any enhancements to the public realm which may improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.

<b>Site Name</b>	10 Bank Street							
<b>Site Capacity</b>	575							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA12: Flooding</b>	-	H	D	L	I	P	LT	The site is located within flood zone 2 and 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, the site will also provide an outfall for surface water drainage into the docks.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the Middle and South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.  In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site. The site has average access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	Climate and heat risk at the site is medium. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	10 Bank Street							
<b>Site Capacity</b>	575							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Westferry and Park Place and 10 Bank Street.</p> <p><b>IIA1/2:</b> If construction of this site and the Riverside South and Marsh Wall West sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA5:</b> In combination, this site and the Westferry and Park Place and Riverside South sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on LVMF areas in combination with neighbouring sites Westferry and Park Place and Riverside South.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets.</p> <p><b>IIA14:</b> If construction of this site, the Westferry and Park Place, Riverside South and Marsh Wall West sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site, Westferry/Park Place, Riverside South and Marsh Wall West sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites, Westferry and Park Place, Riverside South and Marsh Wall West sites are likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA12/13:</b> Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Westferry/Park Place

Table G-35 – Westferry/Park Place

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	+	M	D	R	I	P	LT	This site has potential to provide approximately 550 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will also provide additional community facilities, however the nature of these is currently unknown.
<b>IIA2: Human Health</b>	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver pocket parks, which will provide publicly accessible open space and improved public realm, improving wellbeing for the local community.
<b>IIA3: Economy &amp; Town Centres</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the 30-50% most deprived nationally in terms of income. The site is located within Canary Warf Major Town Centre and is in close proximity to the Isle of Dogs Activity Area and Canary Warf primary shopping areas. The site will also include commercial space, however at this stage it is not known if the site will include any additional retail space.
<b>IIA4: Employment &amp; Skills</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the 30-50% most deprived nationally in terms of employment. The site is well located to existing employment areas including the Canary Warf Major Town Centre, the Isle of Dogs Activity Area and Canary Warf primary shopping areas. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	+	H	D	R	I	P	LT	The provision of 550 new homes will help towards meeting LBTH's housing target. However, it is currently unclear what proportion of homes will be made affordable and the size, type and tenure of homes. It is assumed that the site will provide 35% affordable housing, meeting the minimum target.
<b>IIA6: Crime &amp; Safety</b>	+	M	I	L	I	P	LT	The site is located within an area of low crime deprivation (10%-20% least deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development. However, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

<b>Site Name</b>	Westferry/ Park Place							
<b>Site Capacity</b>	550							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	+	H	D	L	I	P	LT	The site has good connectivity via public transport through bus and overground and underground rail. This is reflected in the PTAL score of between 5 and 6. The site is also close to the national and London cycle networks. The site will also improve walking and cycling connections between the site and Middle Dock.
<b>IIA8: Accessibility</b>	+	H	D	L	I	P	LT	The existing site has good access to a range of facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel by car as multiple public transport options are nearby, including bus stops, underground (of which Canary Wharf is wheelchair accessible and has 14 Electric Vehicle (EV) charging points), rail and ferry. The national and London cycle networks are also nearby.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	-	M	D	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the southwest of the adjacent site, Riverside South so there is a potential negative effect on ecology as a result, particularly from noise and dust spoiling during construction. Limited information on the provision of GI is known at this stage and whether the site will be in line with BNG targets of BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unclear.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D	L	R/I	P	LT	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings is currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	--	H	D	R	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, so it is pertinent to protect and enhance the setting of heritage assets in and around the area as the proposed location sits directly on a Grade 2 listed gate. Two conservation areas are located within 0.4km North of the site. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Development of the site may also result in damage to, or loss of, the Grade 2 listed gate. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	This site is located within flood zone 2 and 3 and a flood risk zone. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
<b>IIA13: Water Quality</b>	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the North Dock, thus creating potential for increased surface runoff during construction, further polluting this watercourse. No details have been provided on how water quality will be protected through development.

<b>Site Name</b>	Westferry/ Park Place							
<b>Site Capacity</b>	550							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	M	D/I	L	R	T/P	ST/LT	Air quality is generally good at the site, however, levels of NO <sub>2</sub> are >28-43µ/m <sup>3</sup> . The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a low-medium overall climate risk and heat risk rating. However, the site is located within an area of flood risk and flood zone 2 and 3. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Riverside South.</p> <p><b>IIA1/2:</b> If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA5:</b> In combination, this site and the Riverside South site will significantly increase housing stock.</p> <p><b>IIA10:</b> In combination with construction at the Riverside South site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Riverside South.</p> <p><b>IIA14:</b> If construction of this site and the Riverside South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Riverside South site are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site, Riverside South, are likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Westferry/ Park Place							
<b>Site Capacity</b>	550							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Alternative Sites RAG Analysis

Table G-36 - Alternative Sites RAG Analysis results

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
<b>IIA1 Population Density</b>	Red	Red	Red	Red	Amber	Red	Red	Red	Red	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red
<b>IIA1 Higher Education</b>	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green
<b>IIA1 Secondary Schools</b>	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
<b>IIA1 Primary Schools</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA1 IMD Overall deprivation (LSOA)</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red
<b>IIA2 Open Spaces</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA2 Children Centres</b>	Green	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA2 Community Centres</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA2 Allotments</b>	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green
<b>IIA2 IMD Health (LSOA)</b>	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA2 Life Expectancy Male</b>	Red	Red	No data	Green	Amber	No data	Red	Red	Red	Red	Red	No data	Amber	Green	Green	Green	Green	No data	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate	
<b>IIA2 Life Expectancy Female</b>	Amber	Amber	No data	Green	Green	No data	Amber	Amber	Red	Red	Amber	No data	Green	Amber	Amber	Amber	Amber	No data	Green	
<b>IIA2 Sport Facilities</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA2 Healthcare Facilities</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Town Centres</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Neighbourhood Parade</b>	Red	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA3/4 Primary Shopping Areas</b>	Green	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Red	Green	Green	
<b>IIA3/4 Local Industrial Location</b>	Green	Green	Red	Red	Red	Green	Green	Red	Green	Red	Red	Green	Red	Green	Green	Green	Red	Red	Green	
<b>IIA3/4 Tower Hamlets Activity Areas</b>	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber	
<b>IIA3/4 Central Activities Zone</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	
<b>IIA3/4 IMD Income (LSOA)</b>	Red	Red	Amber	Amber	Red	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red	
<b>IIA3/4 IMD Employment (LSOA)</b>	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Red	Red	Red	Red	Green	Red	

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
<b>IIA3/4 Strategic Industrial Locations</b>	Green	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Green	Green	Green	Green	Red	Red
<b>IIA5 IMD Barriers to housing (LSOA)</b>	Red	Amber	Red	Red	Red	Red	Amber	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Amber	Red	Red
<b>IIA5 House Price</b>	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red
<b>IIA6 Crime Rate</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA6 IMD Crime (LSOA)</b>	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Amber
<b>IIA7/8 London Cycle Network</b>	Green	Red	Green	Red	Green	Red	Red	Red	Red	Red	Green	Green	Green	Red	Red	Green	Red	Red	Red
<b>IIA7/8 Tube Stations</b>	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green
<b>IIA7/8 Train Stations</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA7/8 PTAL</b>	Amber	Amber	Red	Red	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA7/8 Bus Stops</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green
<b>IIA7/8 National Cycle Network</b>	Red	Red	Green	Red	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red
<b>IIA7/8 EV Charger Points</b>	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate	
<b>IIA9 Priority Habitat Inventory</b>	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Red
<b>IIA9 SAC</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SPA</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SSI</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 LNR</b>	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber
<b>IIA9 NNR</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA9 SINC</b>	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red
<b>IIA10 Green Belt</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Metropolitan Open Land</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Local Open Spaces</b>	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green
<b>IIA10 London View Management Framework</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Tall Building Zone</b>	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green
<b>IIA10 London Squares</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA10 Strategically Important Skyline</b>	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
<b>IIA11 Listed Buildings</b>	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Green	Red	Red	Red	Amber	Green	Green	Green	Green	Green
<b>IIA11 Scheduled Monuments</b>	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Heritage at risk</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Conservation Areas</b>	Red	Red	Green	Green	Red	Green	Green	Red	Red	Green	Red	Red	Red	Green	Green	Green	Red	Red	Amber
<b>IIA11 Parks and Gardens</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA11 Archaeological Priority Area</b>	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Green	Red	Red
<b>IIA12 Flood Zone</b>	Green	Red	Red	Red	Red	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Red	Red
<b>IIA12 Flood Risk Area</b>	Amber	Amber	Amber	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Amber
<b>IIA13 Water Spaces</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA13 Statutory Main River</b>	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
<b>IIA14 NO2</b>	Amber	Green	Green	Green	Red	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Green
<b>IIA14 PM10</b>	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Green	Green	Green	Green	Green
<b>IIA14 Air Quality</b>	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
<b>IIA15 Climate Risk</b>	Red	Red	Red	Green	Red	No data	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber
<b>IIA15 Heat Risk</b>	Amber	Amber	Red	Amber	Red	No data	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber
<b>IIA17 Safeguarded Wharves</b>	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

## Alternative Sites Assessment Summaries

### Neptune Wharf

Table G-37 - Neptune Wharf

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide around 100 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. At this stage, it is unknown whether these units will be accessible and wheelchair adaptable, and the number of homes which will be affordable, the area is located within the 30-50% most deprived neighbourhoods and so affordability will be a key consideration. The site has access to some community facilities which may help to reduce levels of inequalities. It is not clear on whether the site will provide any additional facilities. The site is not located within close proximity to secondary and higher educational institutions. The site was originally allocated to deliver a school, the site is now earmarked for housing. Therefore, further consideration as to the range and access to educational services will need to be considered to ensure that there is sufficient provision for communities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the site. The site is adjacent to the Hackney Wick neighbourhood centre, and so consideration of maintaining the vitality and vibrancy of the existing centre will be necessary.
I/A4: Employment & Skills	+	M	D	R	I	P	LT	The site is well located within 350m of a locally significant industrial site, which may improve access for residents to employment opportunities. The potential to include employment space could provide new jobs, however details of this are not currently realised. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide approximately 100 new homes, which will contribute somewhat to the borough's housing targets, it will fall significantly below the threshold. No information is currently available on the level of affordable housing, however affordability

<b>Site Name</b>	Neptune Wharf							
<b>Site Capacity</b>	100							
<b>Site Source</b>	New allocation - LLDC Allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								issues are apparent in the local area, therefore affordable housing must be a main consideration in the delivery of the site.
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7: Sustainable Transport</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Access is available to the site via public transport through bus, Overground, underground and rail. The site currently has a PTAL score of 2. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel. Details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. It is unknown whether additional greenspace will be included within the site, or if BNG targets will be met.
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	L	I	P	LT	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development will likely improve townscape and landscape setting.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Fish Island Conservation Area and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. At this stage it is not clear whether development will include measures to enhance and restore the local historic environment.
<b>IIA12: Flooding</b>	--	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in Flood Zones 2 and 3, no details are currently understood relating to flood risk measures for the site.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is east-adjacent to a main river. No details are currently known relating to any measures to mitigate against water quality impacts.

<b>Site Name</b>	Neptune Wharf							
<b>Site Capacity</b>	100							
<b>Site Source</b>	New allocation - LLDC Allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	M	I	L	R	P/T	ST/LT	Air quality at the site is good with low levels of NO <sub>2</sub> and PM <sub>10</sub> . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Overall climate risk is high and overall heat risk is medium. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Neptune Wharf							
<b>Site Capacity</b>	100							
<b>Site Source</b>	New allocation - LLDC Allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater</p> <p><b>IIA1/2:</b> If construction of this site and the other allocated sites at Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites.</p> <p><b>IIA14:</b> If construction of this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased deterioration in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities. This should take into consideration the removal of the school from the development.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15/16:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Hamlet Industrial Estate

Table G-38 - Hamlet Industrial Estate

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	L	D	R	I	P	LT	<p>The site has potential to provide around 100 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. It is expected that an affordable housing threshold of 50% may be delivered, which is key given the area is located within the 30-50% most deprived neighbourhoods. At this stage, it is unknown whether these units will be accessible and wheelchair adaptable.</p> <p>The site has access to some community facilities which may help to reduce levels of inequalities. It is not clear on whether the site will provide any additional facilities. The site is not located within close proximity to secondary and higher educational institutions. Therefore, further consideration as to the range and access to healthcare and educational services will need to be considered to ensure that there is sufficient provision for communities.</p>
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The finer details of the development are not yet known, however the site is allocated for mixed use development which will include employment and residential floorspace, as well as restaurants and cafes. The site is adjacent to the Hackney Wick neighbourhood centre, and so consideration of maintaining the vitality and vibrancy of the existing centre will be necessary.</p>
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is well located within 300m of a locally significant industrial site, which may improve access for residents to employment opportunities. The existing uses of the site comprise of light industrial units, whilst details are not currently available, this may lead to a loss of jobs. New employment is however expected to be created through the provision of employment floorspace, however the details of this are not currently fully understood. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
IIA5: Housing	+/-	L	D	R	I	P	LT	<p>The site has potential to provide approximately 100 new homes, which will contribute somewhat to the borough's housing targets, it will fall significantly below the threshold. No information is currently available on the level of affordable housing, however due to affordability issues prevalent in the local area, affordable housing must be a main consideration in the delivery of the site.</p>

<b>Site Name</b>	Hamlet Industrial Estate							
<b>Site Capacity</b>	100							
<b>Site Source</b>	New allocation - LLDC Allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). Active frontages and increased access will improve public use and improve natural surveillance. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7: Sustainable Transport</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Access is available to the site via public transport through bus, overground, underground and rail. The site currently has a PTAL score of 2. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision.
<b>IIA8: Accessibility</b>	+	L	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by population increases. This may conversely increase the need to travel. The site will deliver improved access to the lower-level towpath along the western bank of the Lee Navigation Canal; however, details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. It is unknown whether additional greenspace will be included within the site, nor are there any details on BNG.
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development will likely improve townscape and landscape setting.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Fish Island Conservation Area and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. It is assumed the site will be designed to be in-keeping with the designated heritage assets and their setting.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located in Flood Zones 2 and 3, no details are currently understood relating to flood risk measures for the site.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is east-adjacent to a main river. No details are currently known relating to any measures to mitigate against water quality impacts.

<b>Site Name</b>	Hamlet Industrial Estate							
<b>Site Capacity</b>	100							
<b>Site Source</b>	New allocation - LLDC Allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA14: Air Quality</b>	+/-	M	D	L	R/I	P/T	ST/LT	Air quality is good at the site, with low levels of NO <sub>2</sub> and PM <sub>10</sub> . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	--	H	D	L	I	P	LT	Overall climate risk is high and overall heat risk is medium and the site is at risk of flooding. Climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

<b>Site Name</b>	Hamlet Industrial Estate							
<b>Site Capacity</b>	100							
<b>Site Source</b>	New allocation - LLDC Allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater</p> <p><b>IIA1/2:</b> If construction of this site and the other allocated sites at Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites.</p> <p><b>IIA14:</b> If construction of this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Millharbour South

Table G-39 – Millharbour South

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	+	M	D	L	I	P	LT	The site has potential to provide around 320 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. The area is within the 30-50% most deprived neighbourhoods. The site should seek to deliver at least 35% affordable housing and wheelchair accessible units. The site has good access to community facilities and is intended to provide further community infrastructure which will help to reduce levels of inequalities. Further consideration as to the range and access to healthcare and educational services will need to be considered to ensure that there is sufficient provision for communities.
<b>IIA2: Human Health</b>	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high. The site will lead to additional community facilities, including open spaces which are likely to improve local health and wellbeing. A green grid is proposed which will promote active transport modes and support sustainable and healthy living for residents.
<b>IIA3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	Finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development to include employment space and retail offering which may improve the footfall to the Crossharbour district centre, therefore improving vitality. There are some businesses currently located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units may be a key concern.
<b>IIA4: Employment &amp; Skills</b>	++	H	D	L	I	P	LT	The site is well located to the Isle of Dogs activity area, which will improve access for residents to employment opportunities. The site is within the 30-50% most deprived in terms of income and employment, and so ensuring sufficient access to a range of employment opportunities is imperative, a range of sizes of employment floorspaces are proposed to serve small to medium enterprises and therefore respond to changing demands in the employment market. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide 320 new homes. which will contribute to the borough's housing targets, however, it will fall significantly below the threshold. Significant affordability issues are apparent in the local area, therefore affordable housing must be a main consideration in the delivery of the site.

<b>Site Name</b>	Millharbour South							
<b>Site Capacity</b>	320							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	L	D/I	L	R	P	LT	The site is located within the 30-50% most deprived neighbourhoods in terms of crime. Improvements to public open spaces, provision of walking and cycling links and the prioritisation of active frontages are expected to increase natural surveillance and therefore improve crime rates and fear of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7: Sustainable Transport</b>	+/-	M	D	L	I	P	LT	The site is within close proximity to Tube and Train Stations, and easily access from bus stop within the site's proximity. The site is also served by both the National and London Cycle Network. Despite this, within the site there appear to be significant variances, as reflected in a PTAL score of 1b-5. Improvements and enhancements to walking and cycle links will help to facilitate a modal shift towards more sustainable modes.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services, and new community infrastructure is proposed, so residents will be able to live more locally and reduce their need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site is less than 0.8km from the Mudchute Park Farm Local Nature Reserve and the site is adjacent to the Millwall and West India Docks SINC. There are no designated sites within the site's boundary. There is potential for some adverse effects during construction, however increased green space is proposed as part of the development which will improve urban greening and provide GI
<b>IIA10: Landscape &amp; Townscape</b>	+	M	D	L	I	P	ST/MT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this Site will enhance the quality and condition of the townscape and landscape. The site is located within the Millwall Inner Dock Cluster Tall Buildings Zone, and so it is expected that the built form of development will respond positively to the surrounding built environment.
<b>IIA11: Historic Environment</b>	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is located within the Isle of Dogs Archaeological Priority Area and is located close to the Maritime Greenwich world heritage site. It is therefore anticipated that the built form will protect and enhance the setting of heritage assets. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets
<b>IIA12: Flooding</b>	-	H	D	L	I	P/T	ST/LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to Millwall Dock. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.

<b>Site Name</b>	Millharbour South							
<b>Site Capacity</b>	320							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA15: Climate Change &amp; Resilience</b>	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that the development could demonstrate potential to connect to the Barkantine Energy Centre and utilise the low carbon heat network. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Westferry Printworks.</p> <p><b>IIA1/2:</b> If construction of this site and the Westferry Printworks site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Westferry Printworks site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Westferry Printworks site will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects on townscape in combination with neighbouring site Westferry Printworks.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Westferry Printworks site.</p> <p><b>IIA14:</b> If construction of this site and the Westferry Printworks site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Westferry Printworks site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Westferry Printworks site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Westferry Printworks is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Millharbour South							
<b>Site Capacity</b>	320							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-40 – Orchard Wharf

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 350 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
<b>I/A2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>I/A3: Economy &amp; Town Centres</b>	+	L	D	L	I	P	LT	The proposed site is located close to London City Island town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
<b>I/A4: Employment &amp; Skills</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site.
<b>I/A5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 350 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>I/A6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (30%-50% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>I/A7: Sustainable Transport</b>	--	M	D	L	R	P	LT	The site is not well located for public transport use. There is one bus stop in close proximity to the site and the closest overground rail station is 650m away. The site has a PTAL score of between 0 and 1b. This is likely to increase the need for residents to travel by car to access local services and facilities. It is also unclear if any additional public transport provision will be proposed as part of the site.

<b>Site Name</b>	Orchard Wharf							
<b>Site Capacity</b>	350							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA8: Accessibility</b>	--	M	D	L	R	P	LT	The site is not well located for public transport use or local facilities and services. The site has a PTAL score of between 0 and 1b. Therefore, there is potential for the exclusion of social groups who rely on public transport. It is unclear if the site includes new facilities or services to meet the needs of the growing population in this area.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the BNG target of 2.5 biodiversity unit (BU) per hectare or 30% gain is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to Local Open Space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting. The site also borders the tall building zone, and there is potential for tall buildings to occur at this site, altering the view. However, this is currently uncertain.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Limmo APA. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within a flood risk area and within flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Thames. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
<b>IIA14: Air Quality</b>	+/-	M	D/I	L	R	P/T	ST/LT	The site provides access to bus and train services, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the

<b>Site Name</b>	Orchard Wharf							
<b>Site Capacity</b>	350							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the nearby sites of Blackwall Trading Estate and Leamouth Road Depot and Reuters.</p> <p><b>IIA1/2:</b> If construction of this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA10:</b> In combination with construction at the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites.</p> <p><b>IIA14:</b> If construction of this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites of Blackwall Trading Estate and Leamouth Road Depot and Reuters is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Orchard Wharf							
<b>Site Capacity</b>	350							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12/13:</b> The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Tobacco Dock

Table G-41 – Tobacco Dock

<b>Site Name</b>	Tobacco Dock							
<b>Site Capacity</b>	TBC							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain how many homes would be provided at the site. Additionally, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
<b>IIA2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however it's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>IIA3: Economy &amp; Town Centres</b>	+	L	D	L	I	P	LT	The proposed site is located close to multiple town centres, including Watney, Wapping Lane and Thomas Moore Street, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
<b>IIA4: Employment &amp; Skills</b>	+	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. It is currently uncertain if the site will include any additional retail space.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently unclear how many homes the site will provide. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (30%-50% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, Overground, underground and rail. The site has a PTAL score of between 2 and 4. It is uncertain if there are plans for additional transport provision.
<b>IIA8: Accessibility</b>	+	M	D	R	I	P	LT	The existing site has good access to transport, facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.

<b>Site Name</b>	Tobacco Dock							
<b>Site Capacity</b>	TBC							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. No information has been provided on provision of GI. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to multiple areas of Local Open Space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape and townscape setting.
<b>IIA11: Historic Environment</b>	--	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity, including the Shadwell Roman Settlement Scheduled Monument.. The site is located within the Shadwell Roman Settlement archaeological priority area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Development of the site may also result in damage to, or loss of, the scheduled monument.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	M	D/I	L	R	P/T	ST/LT	The site provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing

<b>Site Name</b>	Tobacco Dock							
<b>Site Capacity</b>	TBC							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the nearby site of London Dock.</p> <p><b>IIA1/2:</b> If construction of this site and the London Dock site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA10:</b> In combination with construction at the London Dock site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the London Dock site.</p> <p><b>IIA14:</b> If construction of this site and the London Dock site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the London Dock site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site of London Dock is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12:</b> The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							



## Canada Square/Churchill Place

Table G-42 – Canada Square/Churchill Place

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site will provide 250 new homes, which will not make a significant contribution to meeting the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities, and the life expectancy is higher than the national average for both males and females and health deprivation is low. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located in a town centre and is adjacent to a primary shopping area, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if Churchill Place Shopping Mall will be lost as a result of the site and if the site will include any additional retail space.
IIA4: Employment & Skills	+/-	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document. The site does however remove the opportunity for potential employment space in this location.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site will provide 250 new homes, which will not make a significant contribution to meeting the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of low crime deprivation (lowest 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	Access is readily available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 6a and 5. There are no plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services, shown by the site having a PTAL scores ranging between 6a and 5. The site will allow residents to live their lives more locally and reduce the need to travel.

<b>Site Name</b>	Canada Square/Churchill Place							
<b>Site Capacity</b>	250							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA10: Landscape &amp; Townscape</b>	-	L	D/I	L	R	T	ST	The site is located next to designated open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to enhance the existing and provide further open spaces and the public realm and improve the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	-	L	I	R	I	P	LT	The site is located within an APA, and 0.3km from Coldharbour Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is partially located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
<b>IIA13: Water Quality</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to a waterway leading from the River Thames. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

<b>Site Name</b>	Canada Square/Churchill Place							
<b>Site Capacity</b>	250							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA18: Efficient use of Land</b>	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 250 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites of Wood Wharf and Billingsgate Market.</p> <p><b>IIA1/2:</b> If construction of this site and the Wood Wharf and Billingsgate Market sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Wood Wharf and Billingsgate Market sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Wood Wharf and Billingsgate Market sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Wood Wharf and Billingsgate Market sites.</p> <p><b>IIA14:</b> If construction of this site and the Wood Wharf and Billingsgate Market sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Wood Wharf and Billingsgate Market sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites of Wood Wharf and Billingsgate Market is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/5/8:</b> Units within the site should be made accessible and wheelchair adaptable.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum urban greening factor UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12/13:</b> The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

# London Chest Hospital

Table G-43 - London Chest Hospital

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 290 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high so affordability needs to be a key consideration. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high (30%-50% of most deprived neighbourhoods) and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located within close proximity to a primary shopping area, neighbourhood parade and town centre. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 290 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (top 30-50% of most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has good access to the site via public transport through bus, overground, underground and rail. However, the underground rail is located 610m from the site. This is reflected by the site having a PTAL scores ranging between 2 and 4. It is uncertain if there are plans for additional transport provision.

<b>Site Name</b>	London Chest Hospital							
<b>Site Capacity</b>	290							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA8: Accessibility</b>	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located 60m south of Local Open Space at Victoria Park. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
<b>IIA11: Historic Environment</b>	--	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within St James' Cemetery and Bonner Manor Archaeological Priority Area, and within the Victoria Park Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site is also likely to result in the demolition of existing listed buildings at the site, and alterations to the remaining main hospital listed building. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	-	L	D	L	I	T	ST	The site is located 50m south of the Grand Union Canal. There is potential for increased surface runoff during construction, further polluting this watercourse.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors and schools surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.

<b>Site Name</b>	London Chest Hospital							
<b>Site Capacity</b>	290							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marian Place Gasworks and The Oval.</p> <p><b>IIA1/2:</b> If construction of this site and the Marian Place Gasworks and The Oval site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA5:</b> There is potential for cumulative effects on housing as a result of this site in combination with Marian Place Gasworks and The Oval.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Marian Place Gasworks and The Oval site.</p> <p><b>IIA14:</b> If construction of this site and the Marian Place Gasworks and The Oval site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Marian Place Gasworks and The Oval site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Marian Place Gasworks and The Oval is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	London Chest Hospital							
<b>Site Capacity</b>	290							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> Phase 1 habitat surveys should be undertaken to determine if there are any species residing in the areas of priority habitat.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## LEB Building

Table G-44 - LEB Building

Site Name	LEB Building							
Site Capacity	190							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high so affordability needs to be a key consideration. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (30%-50% of most deprived neighbourhoods) and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is located adjacent to a primary shopping area and town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6b. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.

<b>Site Name</b>	LEB Building							
<b>Site Capacity</b>	190							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located 20m from Local Open Space at Bethnal Green Gardens. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity, including listed buildings and the registered park and garden of Bethnal Green Gardens. The site is also located within Bethnal Green Archaeological Priority Area, and within Bethnal Green Gardens Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium-high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing

<b>Site Name</b>	LEB Building							
<b>Site Capacity</b>	190							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites of Anchor Retail Park and Whitechapel North.</p> <p><b>IIA1/2:</b> If construction of this site and the Anchor Retail Park and Whitechapel North sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Anchor Retail Park and Whitechapel North sites will significantly increase the number of business and jobs.</p> <p><b>IIA10:</b> In combination with construction at the Anchor Retail Park and Whitechapel North sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Anchor Retail Park and Whitechapel North sites.</p> <p><b>IIA14:</b> If construction of this site and the Anchor Retail Park and Whitechapel North sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Anchor Retail Park and Whitechapel North sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites of Anchor Retail Park and Whitechapel North is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## 72-90 Chrisp Street

Table G-45 – 72-90 Chrisp Street

Site Name	72-90 Chrisp Street							
Site Capacity	150							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not make a significant contribution to meeting the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
<b>IIA2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>IIA3: Economy &amp; Town Centres</b>	+	L	D	L	I	P	LT	The site is well located, in close proximity to a number of town centres, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
<b>IIA4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	The site is well located close to Empson Street SIL, Canary Wharf major centre, and the Isle of Dogs Activity Area, providing opportunities for access to employment. However, it is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not make a significant contribution to meeting the borough's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
<b>IIA6: Crime &amp; Safety</b>	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
<b>IIA7: Sustainable Transport</b>	+	L	D	L	I	P	LT	The site is well connected via public transport through bus and Overground rail. However, the site is located more than 800m from the closest tube station. This is reflected in the site's PTAL score, ranging between 2 and 4. It is uncertain if there are plans for additional transport provision.

<b>Site Name</b>	72-90 Chrisp Street							
<b>Site Capacity</b>	150							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA8: Accessibility</b>	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to Local Open Space at Alton Street. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Lea Valley archaeological priority area, and within Lansbury Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 2, with the eastern border of the site located in an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has existing good air quality and provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

<b>Site Name</b>	72-90 Chrisp Street							
<b>Site Capacity</b>	150							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA18: Efficient use of Land</b>	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with Chrisp Street and Teviot Estate.</p> <p><b>IIA1/2:</b> If construction of this site, Chrisp Street, and Teviot Estate were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site, the Chrisp Street, and Teviot Estate sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site, Chrisp Street, and Teviot Estate sites will significantly increase housing stock.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from this site, Chrisp Street and Teviot Estate.</p> <p><b>IIA14:</b> If construction of this site, Chrisp Street and Teviot Estate were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site, Chrisp Street and Teviot Estate is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring sites of Chrisp Street and Teviot Estate is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA12:</b> The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Tower Hamlets Car Pound

Table G-46 – Tower Hamlets Car Pound

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 120 homes, which will not make a significant contribution to meeting the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high, so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (10%-20% of most deprived neighbourhoods) and life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, adjacent to Limehouse town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
I/A4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas and has a high level of employment deprivation (10% - 20% most deprived). It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 120 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
I/A6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
I/A7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus and Overground rail. However, the site is located more than 800m from the closest tube station. Despite this, the site has a PTAL score ranging between 5 and 6b. It is uncertain if there are plans for additional transport provision.

<b>Site Name</b>	Tower Hamlets Car Pound							
<b>Site Capacity</b>	120							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA8: Accessibility</b>	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are no designated sites within the site. There is an area of priority habitat 160m from the site. Construction works have the potential to negatively impact this habitat and the species within it from noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to local open space, and the London Square of York Square Gardens. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is also located within York Square Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

<b>Site Name</b>	Tower Hamlets Car Pound							
<b>Site Capacity</b>	120							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with Watney Market.</p> <p><b>IIA1/2:</b> If construction of this site and Watney Market were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Watney Market site will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Watney Market site will significantly increase housing stock.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Watney Market site.</p> <p><b>IIA14:</b> If construction of this site and the Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Watney Market site is likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Watney Market is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Anchor Retail Park

Table G-47 – Anchor Retail Park

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	M	D	R	I	P	LT	The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	-	L	D	R	R	P	LT	The proposed site does not propose mixed use development such as employment space or retail and removes the current retail provision within the site.
IIA4: Employment & Skills	+/-	M	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site does however remove the current retail provision within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	-	L	D	R	I	P	LT	The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6. It is not clear whether there will be plans for additional sustainable transport provision.

<b>Site Name</b>	Anchor Retail Park							
<b>Site Capacity</b>	325							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	-	L	I	R	I	P	LT	The site has a number of heritage assets within its vicinity and is located within an Archaeological Priority Area, and St Peter's and Stepney Green Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.

<b>Site Name</b>	Anchor Retail Park							
<b>Site Capacity</b>	325							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North.</p> <p><b>IIA1/2:</b> If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North site.</p> <p><b>IIA14:</b> If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Whitechapel North site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Whitechapel North site is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/5/8:</b> Units within the site should be made accessible and wheelchair adaptable.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Republic Estate

Table G-48 – Republic Estate

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	M	D	R	I	P	LT	The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	+/-	L	D	R	I	P	LT	The proposed site does not propose mixed use development such as employment space or retail. The site will improve and enhance connectivity between business clusters and the housing market however removes the opportunity for potential employment space in this location.
IIA4: Employment & Skills	+/-	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site does however remove the opportunity for potential employment space in this location. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	-	L	D	R	I	P	LT	The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	Some access is available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 3 and 4. There are no plans for additional transport provision.
IIA8: Accessibility	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has average access to facilities and service, reflected by the site having a PTAL scores ranging between 3 and 4. At this stage it is not known how many units will be accessible and wheelchair adaptable, and if any accessible provision will be included as part of the site.

<b>Site Name</b>	Republic Estate							
<b>Site Capacity</b>	300							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA9: Biodiversity &amp; Natural Capital</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	-	L	I	R	I	P	LT	The site has a number of heritage assets within its vicinity and is located within an Archaeological Priority Area, and adjacent to Naval Row Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site has average access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

<b>Site Name</b>	Republic Estate							
<b>Site Capacity</b>	300							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA18: Efficient use of Land</b>	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Reuters and Aberfeldy Estate.</p> <p><b>IIA1/2:</b> If construction of this site and the Reuters and Aberfeldy Estate sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Reuters and Aberfeldy Estate sites.</p> <p><b>IIA14:</b> If construction of this site and the Reuters and Aberfeldy Estate sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Reuters and Aberfeldy Estate sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Reuters and Aberfeldy Estate sites is likely to result in a cumulative increase in waste.</p>							
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/5/8:</b> Units within the site should be made accessible and wheelchair adaptable.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA8/9/11:</b> A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Watney Market

Table G-49 – Watney Market

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain how many homes would be provided at the site. Additionally, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities.
<b>IIA2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>IIA3: Economy &amp; Town Centres</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the town centre. However, there are a number of small businesses located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units will be a key concern.
<b>IIA4: Employment &amp; Skills</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone as well as primary shopping areas. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	It is unclear how many homes will be provided at the site. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.

<b>Site Name</b>	Watney Market							
<b>Site Capacity</b>	TBC							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus and overground and underground rail. Access to the national cycle network is also nearby. This is reflected by the site having a PTAL scores ranging between 6a. It is not clear whether there will be plans for additional sustainable transport provision.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The closest designated sites are priority habitats are located 0.25km south of the site in St George's gardens and whilst it does not fall within the boundary of this site, there is potential for some adverse effects on deciduous woodland found there. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not located within any LVMF or tall building areas, however, there are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has a number of heritage assets within its vicinity and is located within close proximity to an APA and is located on the border of a Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. At this stage it is not clear whether development will include measures to enhance and restore the local historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	Air quality at this site is considered at moderate levels (>28-43µ/m <sup>3</sup> for NO <sub>2</sub> and PM <sub>10</sub> ). The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating. Development specific climate resilience are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will

<b>Site Name</b>	Watney Market							
<b>Site Capacity</b>	TBC							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>I/A Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>I/A16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>I/A17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>I/A18: Efficient use of Land</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is predominantly on previously developed land. The density of housing is not currently known nor is it clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>I/A1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel South.</p> <p><b>I/A1/2:</b> If construction of this site and the Whitechapel South site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>I/A3/4:</b> In combination, this site and the Whitechapel South site will significantly increase the number of business and jobs.</p> <p><b>I/A5:</b> In combination, this site and the Whitechapel South site will significantly increase housing stock.</p> <p><b>I/A11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from this site.</p> <p><b>I/A14:</b> If construction of this site and the Whitechapel South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>I/A16:</b> The construction of both this site and the Whitechapel South site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>I/A17:</b> Demolition, excavation, and construction of this site and neighbouring site Whitechapel South is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Watney Market							
<b>Site Capacity</b>	TBC							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA3/4:</b> The loss of businesses should be avoided, however, in line with Policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> Phase 1 habitat surveys should be undertaken to determine if there are any habitats/ species residing in St George's Gardens.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

## Devons Road

Table G-50 - Devons Road

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site has potential to provide at least 2,100 new homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for student accommodation or wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. At this stage it is not clear whether development would result in the loss of this open space.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, the site is located in the 30-50% most deprived area nationally. It is unknown if the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, adjacent to Devons Road neighbourhood town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail or business space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is in the 10-20% least deprived nationally in terms of employment. The site is located adjacent to a strategic industrial location, offering opportunities for access to employment. At this stage it is not known if the site will offer additional facilities that offer employment options. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 2,100 new homes will help towards meeting LBTH's housing target. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.

<b>Site Name</b>	Devons Road							
<b>Site Capacity</b>	2100							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA6: Crime &amp; Safety</b>	+	L	D/I	L	I	P	LT	The site is located in the 10%-20% most deprived area nationally for crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing is likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
<b>IIA7: Sustainable Transport</b>	+	L	D	L	I	P	LT	The site has average access to bus stops, rail station, the underground and the cycle network. This is reflected in the site having a PTAL level of between 2 and 4. The site is well located to local facilities and services which will allow residents to live their lives more locally.
<b>IIA8: Accessibility</b>	+	L	D	L	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel. Details on additional services and facilities are unknown at this stage.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	-	L	D/I	L	R/I	T	ST/LT	The site is adjacent to Tower Hamlets Cemetery Park local nature reserve and areas of deciduous woodland. Construction works have the potential to negatively impact small scale habitats and species from noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
<b>IIA10: Landscape &amp; Townscape</b>	+/-	M	D/I	R	R/I	P/T	ST/LT	The site is adjacent to local open space, there are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
<b>IIA11: Historic Environment</b>	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is adjacent to Lea Valley Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
<b>IIA12: Flooding</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R	P/T	ST/LT	The site provides access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are

<b>Site Name</b>	Devons Road							
<b>Site Capacity</b>	2100							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Bow Common Lane.</p> <p><b>IIA1/2:</b> If construction of this site and the Bow Common Lane site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA5:</b> There is potential for cumulative effects on housing as a result of this site in combination with Bow Common Lane.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Bow Common Lane site.</p> <p><b>IIA14:</b> If construction of this site and the Bow Common Lane site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA16:</b> The construction of both this site and the Bow Common Lane site is likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Bow Common Lane is likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Devons Road							
<b>Site Capacity</b>	2100							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1:</b> Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p><b>IIA1/2:</b> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p><b>IIA14/15/16:</b> Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Hertsmere House

Table G-51 – Hertsmere House

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>IIA1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide 350 new homes. However, at this stage, it is not known how many of these units will be affordable, and whether there will be provision made for wheelchair adaptable homes. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. At this stage, details on any additional facilities are not available.
<b>IIA2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, it is unknown whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>IIA3: Economy &amp; Town Centres</b>	+	M	D	L	I	P	LT	The site is situated within the Isle of Dogs Activity Area and so there is likely good accessibility to employment opportunities, which is reflected in good levels of employment and income for the area. The finer details of the development are not yet known; however, it is assumed that the site will include some employment space which will provide further jobs for future residents and enhance connectivity between business clusters and the housing market. The site is located outside of a designated retail centre, and so any development should not impact on the vitality of nearby retail centres.
<b>IIA4: Employment &amp; Skills</b>	+	M	D	L	I	P	LT	The site is situated within the Isle of Dogs Activity Area and so there is likely good accessibility to employment opportunities, which is reflected in good levels of employment and income for the area. The finer details of the development are not yet known; however, it is assumed that the site will include some employment space which will provide further jobs for future residents. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>IIA5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to deliver 350 homes, which will contribute somewhat to the borough's housing targets, however it will fall below the threshold. No details are currently available on the level of affordable housing. The provision of sufficient affordable housing is imperative given the significant barriers to housing which exist within the site. Currently, no details are known on the provision of accessible homes.
<b>IIA6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not considered to be within the most deprived neighbourhoods from a crime perspective. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
<b>IIA7: Sustainable Transport</b>	-	N/A	N/A	N/A	N/A	N/A	N/A	There is an average provision of public transport at the site, as reflected in a PTAL score between 3-4. The site is in close proximity to bus stops, underground and overground rail

<b>Site Name</b>	Hertsmere House							
<b>Site Capacity</b>	350							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								links. A section of the London Cycle Network runs to the south of the site. It is not clear whether there will be plans for additional sustainable transport provision.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	+/-	M	D	L	R/I	P/T	ST/LT	The site is around 0.8km from the Russia Dock Woodland. There is a potential negative effect on ecology as a result, particularly during construction. The site is also located in close proximity to a number of SINC. Green space is proposed as part of the development which will improve urban greening and provide GI; however, it is unknown whether the site will be in line with BNG targets
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Canary Wharf Cluster Tall Building Zone. Development will need to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of development is currently unknown. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. Improvements to public realm are currently unknown.
<b>IIA11: Historic Environment</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. The site is also adjacent to the West India Dock Conservation Area and the Narrow Street Conservation Area. Any development of the site will need to protect and enhance the setting of heritage assets, this will depend on the scale, massing, layout and materials that are proposed. However, details on this, and any potential enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. It is unknown whether the site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction.
<b>IIA15: Climate Change &amp; Resilience</b>	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the

<b>Site Name</b>	Hertsmere House							
<b>Site Capacity</b>	350							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	+	L	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Northquay and Westferry and Park Place.</p> <p><b>IIA1/2:</b> If construction of this site and the Northquay and Westferry and Park Place sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Northquay and Westferry and Park Place sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Northquay and Westferry and Park Place sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites Northquay and Westferry and Park Place.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Northquay and Westferry and Park Place sites.</p> <p><b>IIA14:</b> If construction of this site and the Northquay and Westferry and Park Place sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Northquay and Westferry and Park Place sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Northquay and Westferry and Park Place sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Northquay and Westferry and Park Place sites are likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Hertsmere House							
<b>Site Capacity</b>	350							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

## Samuda Estate

Table G-52 – Samuda Estate

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
<b>I/A1: Population &amp; Equalities</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide 850 new homes, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities and will support a changing demographic.
<b>I/A2: Human Health</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and life expectancy is similar to the national average for both men and women. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
<b>I/A3: Economy &amp; Town Centres</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located to existing employment areas, as it is in close proximity to the Isle of Dogs activity area. This will likely improve access for residents to employment opportunities. The site is located near to the South Quay neighbourhood centre, and it is imperative that any development does not lead to a negative impact on the centre. The site provides an opportunity to provide mixed use development which would further improve connectivity between business clusters and the housing market, however details of how this could be delivered are not currently apparent.
<b>I/A4: Employment &amp; Skills</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within close proximity to the Isle of Dogs Activity Area and the South Quay Neighbourhood centre, which are likely to improve access for residents to employment opportunities. The site is currently in the most deprived decile in terms of income and employment, and so it is important to ensure sufficient opportunities for a wide range of jobs is provided to avoid stagnation of the labour market. It is currently unclear as to whether any employment space within the site will be provisioned within redevelopment, affordability of new units may be a key concern. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
<b>I/A5: Housing</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 850 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
<b>I/A6: Crime &amp; Safety</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Most of the site area lies within the 20% most deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.

<b>Site Name</b>	Samuda Estate							
<b>Site Capacity</b>	850							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>IIA7: Sustainable Transport</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has average access to public transport, as reflected in a PTAL score between 2-3, the site is situated within reasonable proximity to bus stops and underground and overground stations. The site is not currently served by active transport links via the National or Local Cycle Network. It is not clear whether there will be plans for additional sustainable or active transport provision.
<b>IIA8: Accessibility</b>	+	M	D	L	I	P	LT	The existing site has good access to facilities and services. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
<b>IIA9: Biodiversity &amp; Natural Capital</b>	-	L	I	L	R/I	P/T	ST/LT	The site is located adjacent to a mudflat priority habitat to the East. The Mudchute Park Farm Local Nature Reserve is situated less than 0.3km to the South West of the site. There are also a number of SINCs located in close proximity to the site. There is a potential negative effect on ecology as a result, particularly during construction. Currently, there are no details as to whether GI will be included within proposals, and whether the site will be in line with BNG targets.
<b>IIA10: Landscape &amp; Townscape</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development is likely to improve townscape and landscape setting. An area of local space is found west adjacent to the site, and any proposal coming forward will need to be designed with the preservation of the existing built form and density in mind.
<b>IIA11: Historic Environment</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Isle of Dogs archaeological priority area. Consideration should be given to ensure there is no impact on the setting of the historic docks and Maritime Greenwich World Heritage Site to the South, the Coldharbour Conservation Area to the North. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. It is unknown whether there will be any enhancements to the public realm which may improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
<b>IIA12: Flooding</b>	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
<b>IIA13: Water Quality</b>	-	L	D/I	L	R/I	P/T	MT/LT	The site is located in close proximity to the River Thames, there is potential for increased surface runoff during construction, further polluting this watercourse.
<b>IIA14: Air Quality</b>	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site. The site has average access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of

<b>Site Name</b>	Samuda Estate							
<b>Site Capacity</b>	850							
<b>Site Source</b>	New allocation							
<b>Site Status</b>	New allocation							
<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
								existing residential receptors surrounding the site which would be negatively impacted during construction.
<b>IIA15: Climate Change &amp; Resilience</b>	--	H	D	L	I	P	LT	Climate and heat risk at the site is medium/medium-high. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
<b>IIA16: GHG Emissions</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
<b>IIA17: Waste</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
<b>IIA18: Efficient use of Land</b>	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
<b>Potential Cumulative/ Synergistic Effects</b>	<p><b>IIA1/2:</b> There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Limeharbour and Crossharbour.</p> <p><b>IIA1/2:</b> If construction of this site and the Limeharbour and Crossharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p><b>IIA3/4:</b> In combination, this site and the Limeharbour and Crossharbour sites will significantly increase the number of business and jobs.</p> <p><b>IIA5:</b> In combination, this site and the Limeharbour and Crossharbour sites will significantly increase housing stock.</p> <p><b>IIA10:</b> There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites Limeharbour and Crossharbour.</p> <p><b>IIA11:</b> There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Limeharbour and Crossharbour site.</p> <p><b>IIA14:</b> If construction of this site and the Limeharbour and Crossharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p><b>IIA15:</b> The increase in GI provided by both this site and the Limeharbour and Crossharbour sites are likely to increase resilience to the UHI effect.</p> <p><b>IIA16:</b> The construction of both this site and the Crossharbour and Limeharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p><b>IIA17:</b> Demolition, excavation, and construction of this site and neighbouring site Limeharbour and Crossharbour sites are likely to result in a cumulative increase in waste.</p>							

<b>Site Name</b>	Samuda Estate							
<b>Site Capacity</b>	850							
<b>Site Source</b>	New allocation							
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<b>IIA Objective</b>	<b>Significance</b>	<b>Magnitude</b>	<b>Nature of effect</b>	<b>Spatial Extent</b>	<b>Reversibility</b>	<b>Permanence</b>	<b>Duration</b>	<b>Description of potential Effects</b>
<b>Mitigation and Enhancement Measures</b>	<p><b>IIA1/2:</b> Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p><b>IIA3/4:</b> Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p><b>IIA6:</b> Development should incorporate designing out crime principles identified in Policy PS4.</p> <p><b>IIA7:</b> Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p><b>IIA9:</b> In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p><b>IIA10:</b> The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p><b>IIA11:</b> Development should be in line with policies PS6 and PS7.</p> <p><b>IIA12/13:</b> The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p><b>IIA14:</b> A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p><b>IIA15:</b> Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p><b>IIA17:</b> A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p><b>IIA17/18:</b> Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



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London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

Appendix H - Equalities Impact Assessment



London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

## **Appendix H - Equalities Impact Assessment**

**Type of document (version) Public**

**Project no. 70103752**

**Our Ref. No. 003**

**Date: June 2024**

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# Quality control

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<b>Issue/revision</b>	<b>First issue</b>	<b>Revision 1</b>	<b>Revision 2</b>	<b>Revision 3</b>
Remarks	Draft for LBTH	Final for Regulation 18 Consultation	Draft for Regulation 19	Final for Regulation 19
Date	September 2023	October 2023	May 2024	June 2024
Prepared by	Emily Bonnet	Emily Bonnet	Charlotte Town	Charlotte Town
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Signature				
Project number	70103752	70103752	70103752	70103752



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# 1 Introduction

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## 1.1 Background and context

- 1.1.1. The London Borough of Tower Hamlets (LBTH) is currently preparing a New Local Plan (NLP), which will replace The Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits adopted in 2020<sup>1</sup>. The new Tower Hamlets NLP will comprise five sub-areas, as planning functions for the London Legacy Development Corporation (LLDC) in the north-east of LBTH are expected to be returned to LBTH in 2024. The sub-areas are City Fringe, Central Area, Lower Lea Valley, Isle of Dogs and South Poplar, and Hackney Wick and Fish Island (current LLDC area).
- 1.1.2. An Integrated Impact Assessment (IIA) has been undertaken to ensure that sustainability aspects are incorporated into the NLP. The IIA enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. This process also helps to simplify outcomes and recommendations for policymakers.
- 1.1.3. As part of the IIA, an Equality Impact Assessment (EqIA) has been undertaken to assess from an equality perspective the impacts and likely effects of policies in the NLP on different groups protected by equalities legislation, notably the Equalities Act 2010. It will also seek to identify whether such policy categories might have an adverse impact on equality of opportunity.
- 1.1.4. The outcomes of the EqIA have informed the IIA.

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<sup>1</sup> Tower Hamlets Council (2020) Tower Hamlets Local Plan 2031. Available at: [https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH\\_Local\\_Plan\\_2031\\_accessibility\\_checked.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf)

## 2 Legislation

- 2.1.1. The Equality Act 2010<sup>2</sup> came into force on 1 October 2010 and brought together over 116 separate pieces of legislation into a single Act. The Act provides a legal framework to protect the rights of individuals that share defined "protected characteristics" and advance equality of opportunity. In addition, the Act states that, when making decisions, an authority must consider methods to reduce any inequalities which may arise for those from a disadvantaged socio-economic background.
- 2.1.2. Those "protected characteristics" which identify the vulnerable groups who may be disproportionately impacted upon or discriminated against are outlined in **Table 2-1**. Protection extends to those who are perceived to have these characteristics or who suffer discrimination because they are associated with someone who has that characteristic, e.g. cares for someone with a disability.

**Table 2-1 – Protected groups listed under the Equality Act 2010**

Protected Characteristic	People and Aspects Included
Sex	Men, women, married and single people; parenting, caring, flexible working and equal pay concerns.
Religion or belief	People who have a religious belief; people who are atheist or agnostic; people who have a philosophical belief which affects their view of the world or the way they live.
Age	Children (0-16), young people (17-25), working age people (15-64) and elderly people (65 and over).
Disability	People with physical, mental, sensory, visible or hidden impairment (e.g. cancer, HIV, dyslexia).
Race	People from various ethnic groups, as for the Census categories, e.g. White British, Chinese, British Asians, Travellers, Gypsies, Roma, those who are of Caribbean origin, people of mixed heritage, White Irish communities, and people of other nationalities who reside in Britain.

<sup>2</sup> The Stationary Office, Equality Act 2010. Available at: [http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga\\_20100015\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf) (Accessed: 17 January 2022)

Protected Characteristic	People and Aspects Included
Sexual orientation	Heterosexual and bisexual men and women, gay men and lesbians.
Gender reassignment (transgender)	Anyone who is proposing to undergo, is undergoing or has undergone a process for the purpose of reassigning their sex. This applies to anyone at any stage in the transition process, from proposing to reassign their sex, undergoing a process of reassignment, or having fully transitioned.
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby - protection against maternity discrimination (including as a result of breast feeding).
Marriage and civil partnership	People who are married or are civil partners.
Deprivation *	People at risk of socio-economic disadvantage. This also includes young people leaving the system.

*\* Although it is not included as a protected characteristic within the Equality Act 2010, deprivation has been included in the assessment as the Act also requires due regard to reducing the inequalities of outcome which result from socio-economic disadvantage.*

## 3 Equality Impact Assessment

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### 3.1 What is EqIA?

- 3.1.1. An EqIA considers the impact of a project or policy on persons or groups of persons who share characteristics which are protected under section 4 of the Equality Act 2010 ("protected characteristics") and might also include others considered to be vulnerable within society such as low-income groups. It is an information gathering tool which enables decision makers within public bodies to implement their equality duty under the Equality Act 2010.
- 3.1.2. An EqIA guides decision makers and designers to:
- Consider the effects of existing and proposed policy or practice on people who share a "protected characteristic"; and
  - Identify opportunities to improve equality of opportunity and eliminate discrimination.
- 3.1.3. An EqIA should be carried out before making decisions, to inform and shape the outcomes. They should be updated throughout the decision-making process as necessary, as policy or practices are developed.
- 3.1.4. There are three stages to an EqIA: screening, full assessment and outcome monitoring. The screening stage determines which protected characteristics are likely to experience disproportionate impacts, and therefore require consideration within the EqIA. This considers the nature of the public function being exercised and available information on users and impacts. This document represents the assessment on those groups identified.

## 4 Social Profile

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### 4.1 Introduction

- 4.1.1. A social profile for LBTH has been compiled from publicly available data to provide context for the assessment. This comprises information on the following:
- Protected characteristic groups;
  - Local communities; and
  - Sensitive receptors, local community facilities and public transport.

### 4.2 Local Community and Facilities

#### LBTH Community and Character

- 4.2.1. LBTH is an East London borough, comprising much of the 'traditional' East End. It was formed in 1965 from the merger of the former metropolitan boroughs of Stepney, Poplar, and Bethnal Green, named after the historic Tower Division. The borough now contains much of the regenerated London docklands area.
- 4.2.2. LBTH is a world-class hub for financial, professional, and technical sectors, and is home to London's financial district, Canary Wharf. The boroughs total economic output is higher than any of the core UK cities outside of London at £29.7b.
- 4.2.3. All new development must drive up the quality of design, constructed to the highest safety standards and improve the Borough's built environment and liveability.

#### LBTH Local Community Facilities

- Homes:
  - The Office for National Statistics (ONS) reports that the median price paid for homes at the end of December 2022 was £500k<sup>3</sup>.
  - As of 2022 the median house price in the borough was ten times the median income level<sup>4</sup>.
  - In 2019 there were 19,826 households on the Tower Hamlets housing register. This is the third highest waiting list in London after Newham and Lambeth, and the eighth highest nationally<sup>5</sup>.
- Businesses:

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<sup>3</sup> [Median house prices for administrative geographies: HPSSA dataset 9 - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

<sup>4</sup> [House price to workplace-based earnings ratio](#)

<sup>5</sup> [Housing Borough profile \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

- There are 17,000 businesses across the entire borough; and
- 278,000 jobs are generated by their presence<sup>6</sup>.
- Social infrastructure:
  - The Borough has three NHS hospitals; and
  - There are 60 nursery schools, 69 primary schools, 18 secondary schools, 13 sixth form colleges and six special schools.

## Key Borough Concerns

4.2.4. LBTH Strategic Plan 2022-2026 highlights eight key priorities for the borough. These consist of:

- Tackling the cost-of-living crisis;
- Providing homes for the future;
- Accelerating education;
- Boosting culture, business, jobs, and leisure;
- Investing in public services;
- Empowering communities and fighting crime;
- Working towards a clean and green future; and
- A council that listens and works for everyone.

## 4.3 Protected Characteristics Profile

4.3.1. Data from the Office of National Statistics (ONS) has been gathered on the following protected characteristics from Section 4 of the Equality Act 2010:

- Sex;
- Religion;
- Age;
- Disability;
- Race;
- Sexual orientation;
- Pregnancy and maternity;
- Marriage and civil Partnership; and
- Gender reassignment.

4.3.2. Although not a protected characteristic under the Equality Act 2010, the social profile also includes data on deprivation as it provides a measure of a combination of social-economic metrics.

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<sup>6</sup> Tackling the housing crisis [https://www.towerhamlets.gov.uk/lgnl/housing/Tackling\\_the\\_housing\\_crisis.aspx](https://www.towerhamlets.gov.uk/lgnl/housing/Tackling_the_housing_crisis.aspx)

4.3.3. It should be noted that the last Census was taken in 2021. Where there may be some datasets that are not yet available data has been substituted with 2011 census data and other more recent information.

## 4.4 Sex

4.4.1. The total population Tower Hamlets was recorded in 2021<sup>7</sup> as 310,300 people. Within the Borough, approximately 50.2 % of the population were recorded as male and 49.8% as female, which is discordant with the wider London population of 48.5% male and 51.5% female. The percentage of the population who are male in the LBTH area is slightly higher than the national average, and the percentage of the population who are female is slightly lower, as shown in **Table 4-1**. Table 4-1 – Sex Profile 2021<sup>7</sup>

Sex	Tower Hamlets	%	London	%	Great Britain	%
All people	310,300		8,796,600		65,121,700	
Male	155,770	50.2%	4,267,500	48.5%	31,874,600	48.9%
Female	154,530	49.8%	4,529,100	51.5%	33,247,100	51.1%

## 4.5 Religion

4.5.1. As stated in the 2021 Census, of those in LBTH who identify with a religion, the largest group identify as Muslim (39.9%), which is discordant with the national trend. The second largest proportion of the population identify as having no religion (26.6%) as shown in **Table 4-2**.

**Table 4-2 – Religion Profile 2021<sup>7</sup>**

Religion	Tower Hamlets		England %
	Number in 2021	% Total pop in 2021	
Christian	69,223	22.3	46.3
Buddhist	2,961	1.0	0.5

<sup>7</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157252/report.aspx>

Religion	Tower Hamlets		England %
	Number in 2021	% Total pop in 2021	
Hindu	6,298	2.0	1.8
Jewish	1,341	0.4	0.5
Muslim	123,912	39.9	6.7
Sikh	966	0.3	0.9
Other religion	1,652	0.5	0.6
No religion	82,635	26.6	36.7
Religion not stated	21,318	6.9	6.0

## 4.6 Age

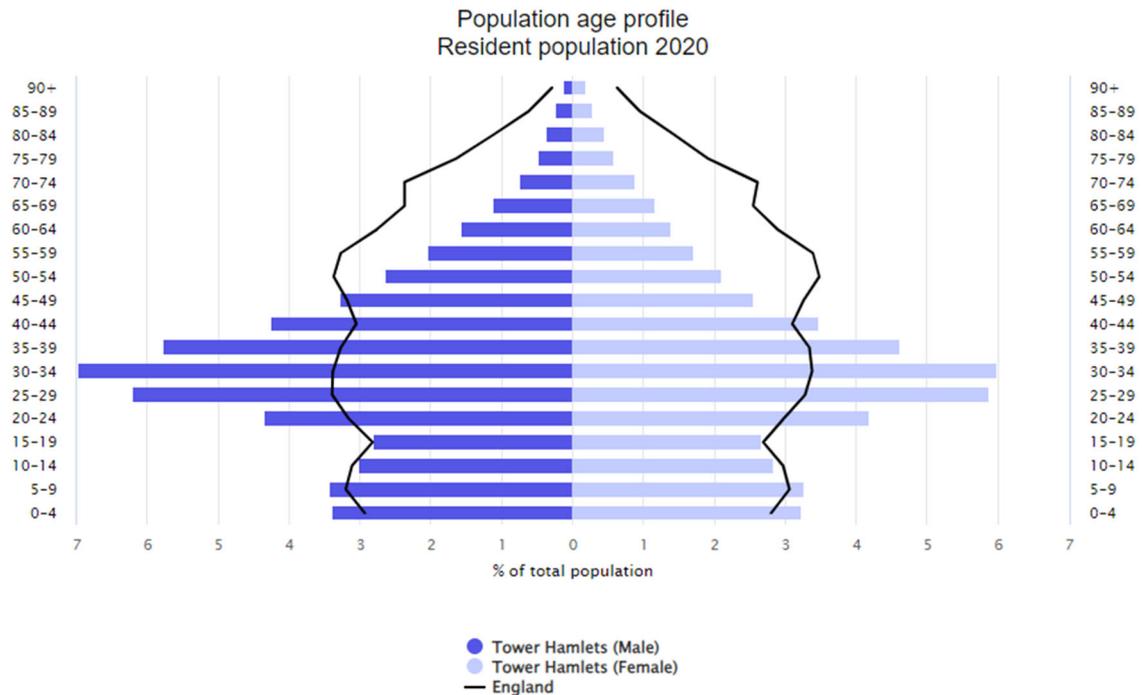
- 4.6.1. As of 2021, the median age in LBTH was 30 years of age, making Tower Hamlets the youngest borough by median age in England and Wales. In accordance with this, 52.9% of the population are aged 16-34.
- 4.6.2. The 2019 Local Authority Health Profiles data on population age shows that Tower Hamlets has a largely differing age structure to England across all age categories (**Table 4-3**). The age category with the greatest difference is 25 to 34 years old, which is 9.5% higher than the average for London and 13.9% higher than England.

**4.6.3.** Figure 4-1 shows the population pyramid of the LBTH area population in 2020, which is the latest available population profile graphic. Although the data is slightly different to the 2021 data presented in Table 4-3 it still illustrates the general trends.

**Table 4-3 – Age Profile 2021<sup>7</sup>**

Age	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Aged 4 years and under	19,090	6.2	6.0	5.4
Aged 5 to 9 years	17,658	5.7	6.0	5.9
Aged 10 to 15 years	20,675	6.7	7.2	7.2
Aged 16 to 19 years	15,085	4.9	4.4	4.6
Aged 20 to 24 years	31,988	10.3	6.7	6.0
Aged 25 to 34 years	85,181	27.5	18.1	13.6
Aged 35 to 49 years	69,956	22.5	22.7	19.4
Aged 50 to 64 years	33,199	10.7	16.9	19.4
Aged 65 to 74 years	10,379	3.3	6.5	9.8
Aged 75 to 84 years	5,024	1.6	3.8	6.1
Aged 85 years and over	2,068	0.7	1.6	2.4

**Figure 4-1 - Population age profile of the LBTH area in 2020<sup>8</sup>**



## Projected Population

- 4.6.4. Between the last two censuses (held in 2011 and 2021), the population of Tower Hamlets increased by 22.1%, from around 254,100 in 2011 to around 310,300 in 2021. This means the borough’s population saw the largest percentage increase in England. The population of London increased by 7.7%, while the population of England rose by 6.6%<sup>9</sup>.
- 4.6.5. The total population in the LBTH area is set to increase across most age groups by 2043, with an overall increase of 18.3%<sup>10</sup>. This projection is higher than the national trend of an expected 7.3% growth. The age group set to experience the biggest growth in this

<sup>8</sup> Local Authority Health Profiles (2020) Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/12/gid/1938132696/pat/6/par/E12000007/ati/202/are/E09000020/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1> This is the latest age profile graphic available.

<sup>9</sup> ONS, Census 2021, How life has changed in Tower Hamlets: Census 2021, 2023. [online] available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E09000030>

<sup>10</sup> ONS. 2018. 2018-Based Subnational Population Projections for Local Authorities and Higher Administrative Areas in England. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/dataset/localauthoritiesinenglandtable2> (Accessed 19/01/2022)



timeframe is 75-79 group at 177.6 %. Age groups anticipated to experience decline are 5–9-year-olds (-2.6%), the 10-14 year olds (-2.6%), 35-39 year olds (-7.1%) and the 40-44 year olds (-6.5%). Further detail has been provided in Table 4-4 below. Table 4-4 – Population Projections 2023-2043<sup>10</sup>

Age Group	2023	2043	% Increase from 2023-2043
0-4	21,530	23,237	4.6%
5-9	22,170	21,592	2.5%
10-14	21,747	21,178	17.7%
15-19	20,228	22,629	35.2%
20-24	28,853	32,852	18.7%
25-29	40,585	45,059	9.7%
30-34	40,950	43,795	0.3%
35-39	35,693	33,144	2.1%
40-44	28,269	26,426	14.3%
45-49	21,730	25,004	42.2%
50-54	17,433	23,999	69.5%
55-59	14,153	23,111	107.6%
60-64	10,901	20,146	126.2%
65-69	8,621	16,028	137.8%
70-74	6,258	12,713	175.0%
75-79	4,139	9,609	177.6%
80-84	2,769	6,376	143.3%
85-89	1,764	3,686	124.0%
90+	1,012	1,989	136.5%
All ages	348,804	412,571	29.9%

## 4.7 Disability

4.7.1. The social model of disability states that people are disabled by barriers in society, not by their impairment or difference. Barriers can be physical, like buildings not having accessible toilets. Or they can be caused by people's attitudes to difference, like assuming disabled people can't do certain things<sup>11</sup>. **Table 4-5** shows the proportion of the population whose day-to-day activities are limited by a long-term health problem or disability in comparison to those that are not. The proportion of the population of LBTH who are limited in their day-to-day activities is representative of the regional average, at 13% and 13.2% respectively. The national average is slightly higher with 17.3% of the population experiencing some degree of limitation<sup>7</sup>.

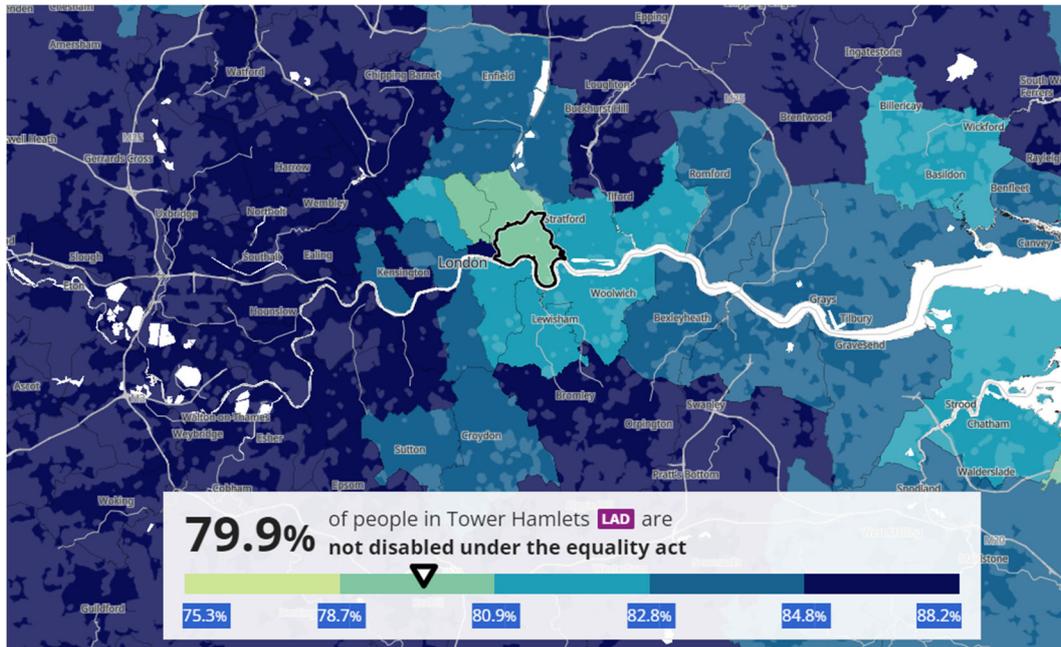
**Table 4-5 – Proportion of those living with limiting health problems or disability 2021<sup>7</sup>**

Day to Day activities	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Limited a Lot	17,599	5.7	5.7	7.3
Limited a little	22,526	7.3	7.5	10.0
Not limited	14,091	4.5	5.2	6.8
No long-term physical or mental health conditions	256,090	82.5	81.5	75.9

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<sup>11</sup> Social model of disability. Scope [online] available at: <https://www.scope.org.uk/about-us/social-model-of-disability/>

**Figure 4-2 - Proportion of the LBTH population classified as disabled under the equality act in comparison to neighbouring boroughs<sup>12</sup>.**



- 4.7.2. **Figure 4-2** demonstrates the raised proportion of the LBTH population living with disability in comparison to neighbouring boroughs. 79.9% of the Tower Hamlets population live without disability, compared to 82.5% in Newham, and 85.5% in Redbridge.
- 4.7.3. Caring, as defined by the census question, refers to giving unpaid help to someone requiring help due to a health condition or disability or because of old age. 6.4% of LBTH residents aged 5 and over were defined as care providers in 2021. This figure is lower than the London average at 7.3%.
- 4.7.4. As of March 2023, there is an estimated 4,850 (1.4 %) people living with sight loss in the LBTH area. This includes around 3,180 (65.5%) people living with mild sight loss, 1,110 (22.8%) people living with moderate sight loss and 560 (11.5%) people living with severe sight loss. By 2032 there are expected to be 6,520 people in Tower Hamlets living with sight loss, an estimated increase of 34% over the next decade<sup>13</sup>.

<sup>12</sup> Census Maps (2021) <https://www.ons.gov.uk/census/maps/choropleth/health/disability-age-standardised/disability-4a/not-disabled-under-the-equality-act?lta=E06000023&lbd=E09000030> (Accessed: 05/09/2023)

<sup>13</sup> [RNIB Sight Loss Data Tool - statistics on sight loss | RNIB | RNIB](#)

**Table 4-6 – Age profile of those living with sight loss 2021<sup>13</sup>**

Age	Tower Hamlets		England %
	Number in 2021 living with sight loss	% of Total in 2021 living with sight loss	
0-17	0	23	23
18-49	205	60	49
50-64	150	11	17
65-74	100	4	7
75+	305	3	6

4.7.5. As of 2019, it was estimated that 24,500 (7.9%) people in LBTH suffered from hearing loss<sup>14</sup>. NHS projections estimate an increase in those suffering from hearing loss of 5.1% by 2035, totalling a hearing loss prevalence of 13%, which is less than both the regional and national predictions of 19% and 25% prevalence respectively<sup>15</sup>.

## 4.8 Race

4.8.1. The 2021 Census data indicates that the majority of the population in the LBTH area is Asian, Asian British or Asian Welsh (44.4%). This group is represented at a percentage of 23.7% higher than the regional average and 34.8% higher than the national average respectively<sup>7</sup>. The largest sub group within this category is Bangladeshi, who make up 34.6% of the population.

<sup>14</sup> [NHS England » Prevalence of hearing loss by CCG area \(2019 ONS predictions\)](#)

<sup>15</sup> [NHS England » Hearing Loss Data Tool](#)

**Table 4-7 – Ethnicity Profile<sup>7</sup>**

Ethnic Group	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Asian, Asian British or Asian Welsh	137,856	44.4	20.7	9.6
Black, Black British, Black Welsh, Caribbean or African	22,693	7.3	13.5	4.2
Mixed or Multiple ethnic groups	15,409	5.0	5.7	3.0
White	122,266	39.4	53.8	81.0
Other ethnic group	12,082	3.9	6.3	2.2

## 4.9 Sexual Orientation

- 4.9.1. In LBTH the vast majority of the population identified as heterosexual at 83.1%. This is marginally lower than the regional and national average of 86.2% and 89.4% respectively. The proportion of the population that identify as gay or lesbian in LBTH is 2.2% higher than the London figure and 2.5% higher than the national figure. Bisexual identification follows a similar pattern in that the proportion is higher in LBTH than it is London and England<sup>7</sup>.
- 4.9.2. Taken together this means that 7.2% of residents identified as part of the LGBTQIA+<sup>16</sup> community. This is significantly higher than the proportions of 4.2% in London and 3.1% in England and Wales<sup>17</sup>.

<sup>16</sup> lesbian, gay, bisexual, transgender, queer, questioning, intersex, or asexual

<sup>17</sup> Tower Hamlets, 2021 Census Findings, 2023 [online] available at: [https://www.towerhamlets.gov.uk/Documents/Borough\\_statistics/Census-2021/2021-Census-key-finding.pptx#:~:text=Overall%20borough%20population,of%20Tower%20Hamlets%20was%20310%2C300.](https://www.towerhamlets.gov.uk/Documents/Borough_statistics/Census-2021/2021-Census-key-finding.pptx#:~:text=Overall%20borough%20population,of%20Tower%20Hamlets%20was%20310%2C300.)

**Table 4-8 – Sexual Orientation Profile 2021<sup>7</sup>**

Sexual Orientation	Tower Hamlets		London %	England %
	Number in 2021	% in 2021		
Straight or Heterosexual	210,070	83.1	86.2	89.4
Gay or Lesbian	10,021	4.0	2.2	1.5
Bisexual	6,376	2.5	1.5	1.3
Pansexual	1,161	0.5	0.4	0.2
Asexual	155	0.1	0.0	0.1
Queer	324	0.1	0.1	0.0
All other sexual orientations	90	0.0	0.0	0.0
Not answered	24,688	9.8	9.5	7.5

## 4.10 Pregnancy and Maternity

- 4.10.1. A maternity is a pregnancy resulting in the birth of one or more children, including stillbirths. In 2016 the maternity rate in the LBTH area was 53.1 (maternities per 1,000 women aged 15 to 44), lower than the maternity rates for London and England, of 62.8 and 61.8 respectively<sup>18</sup>. The greatest amount of live births in the LBTH area are from women in the age category 30-34, which is in line with London and England. Births in the under eighteen age group are less prevalent in LBTH than they are in London and England, with only 0.1% of all live births being to mothers aged eighteen and under compared to 0.4% and 0.8% respectively. Table 4-9 shows Live Births by Age of Mother for LBTH, London and England.
- 4.10.2. In the LBTH area 34.7% of all live births occur outside of marriage or civil partnership. This is a lower proportion than the regional and national averages by 1.7% and 12.2% respectively. This indicates that more live births in the LBTH area occur within marriage or civil partnership than outside of it.

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<sup>18</sup> ONS (2016) Live births in the UK by area of usual residence of mother. Available at : <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsbyareaofusualresidenceofmotheruk> (Accessed 20/01/2022)

**Table 4-9 – Live Births by Age of Mother 2016<sup>18</sup>**

Age of Mother at Birth	Tower Hamlets		London %	England %
	Number in 2016	% of Total live births in 2016		
Under 18	6	0.1	0.4	0.8
Under 20	63	1.4	1.8	3.2
20 to 24	448	9.8	9.9	14.6
25 to 29	1,285	28.0	23.6	28.0
30 to 34	1,643	35.8	34.9	31.8
35 to 39	922	20.1	23.4	18.1
40 to 44	211	4.6	5.7	4.0
45 and over	20	0.4	0.6	0.3
Total Live Births (Number in 2016)	4,592		128,803	663,157
Total Fertility Rate Total Live Births (Number in 2016)	1.39		1.72	1.81

## 4.11 Marriage and Civil Partnership

4.11.1. The percentage of the population which is married or in civil partnership in LBTH is 8% lower than the regional average and 12.7% lower than the national average. In line with this the proportion of the population who are divorced is also lower than the regional and national average by 1.5% and 4.1% respectively.

**Table 4-10 – Marriage and Civil Partnership Profile 2021<sup>7</sup>**

Marriage / Civil Partnership	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Never married and never registered a civil partnership	147,392	58.3	46.2	37.9
Married or in a registered civil partnership	80,955	32.0	40.0	44.7
Separated, but still legally married or still legally in a civil partnership	5,013	2.0	2.3	2.2
Divorced or civil partnership dissolved	12,738	5.0	7.3	9.1
Widowed or surviving civil partnership partner	6,787	2.7	4.2	6.1

## 4.12 Unemployment and Deprivation

4.12.1. There is a smaller proportion of economically active population in LBTH than in the wider London region and the UK. The proportion of unemployment in LBTH is also marginally higher than the national average by 1%.

**Table 4-11 – Employment status in LBTH, London and England**

Employment and Unemployment	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Economically active	190,300	76.6	79.8	78.5
In employment	180,900	72.8	76.2	75.6
Unemployed	8,700	4.6	4.4	3.6

4.12.2. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small neighbourhoods in England. IMD is used by local governments to focus programmes in the most deprived areas and develop strategies, such as the NLPR. IMD measures deprivation in small areas / neighbourhoods called Lower Super Output Areas (LSOAs). There 32,844 LSOAs in England.

4.12.3. In the LBTH area, there are 144 LSOAs. In 2019 of the 144 LSOAs<sup>19</sup>:

- Two LSOAs are within the top 10% most deprived neighbourhoods;
- 84 LSOAs are within the 20-30% most deprived neighbourhoods;
- 35 LSOA's are within the 40-50% of most deprived neighbourhoods;
- 14 LSOA's are within the 40-50% least deprived neighbourhoods;
- Eight LSOA's are within the 30-20% least deprived neighbourhoods; and
- One LSOA's in LBTH are within the 10% least deprived neighbourhoods.

4.12.4. The most deprived LSOAs in the LBTH area are located in the north of the borough and consist of the wards Lansbury, St. Peter's and Stepney green.

4.12.5. The least deprived LSOAs in the LBTH area are located in the south of the borough and consist of the wards Island Gardens, Canary Wharf and St Katherine's and Wapping.

4.12.6. As of 2013, 32,220 of the total population of LBTH were recipients of both housing benefits and council tax benefits. This is a relatively high proportion of the population in comparison

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<sup>19</sup> Indices of Deprivation (2019) Indices of Deprivation: 2015 and 2019- Open Data Blog [online] Available at: [http://dclgapps.communities.gov.uk/imd/iod\\_inex.html](http://dclgapps.communities.gov.uk/imd/iod_inex.html) (Accessed 25/01/2022)

to alternative London boroughs. For neighbouring borough Newham, only 30,740 residents were in receipt of these benefits<sup>20</sup>.

## 4.13 Gender Reassignment

4.13.1. Trans is a general term for people whose gender is different from the gender assigned to them at birth. According to 2021 Census data, only 1% of the LBTH population have a gender identity different from their sex registered at birth. Neighbouring boroughs have similar figures of 1.07% for Hackney and 1.51% for Newham. Outside of the London area these figures are even lower, predominantly <1%.

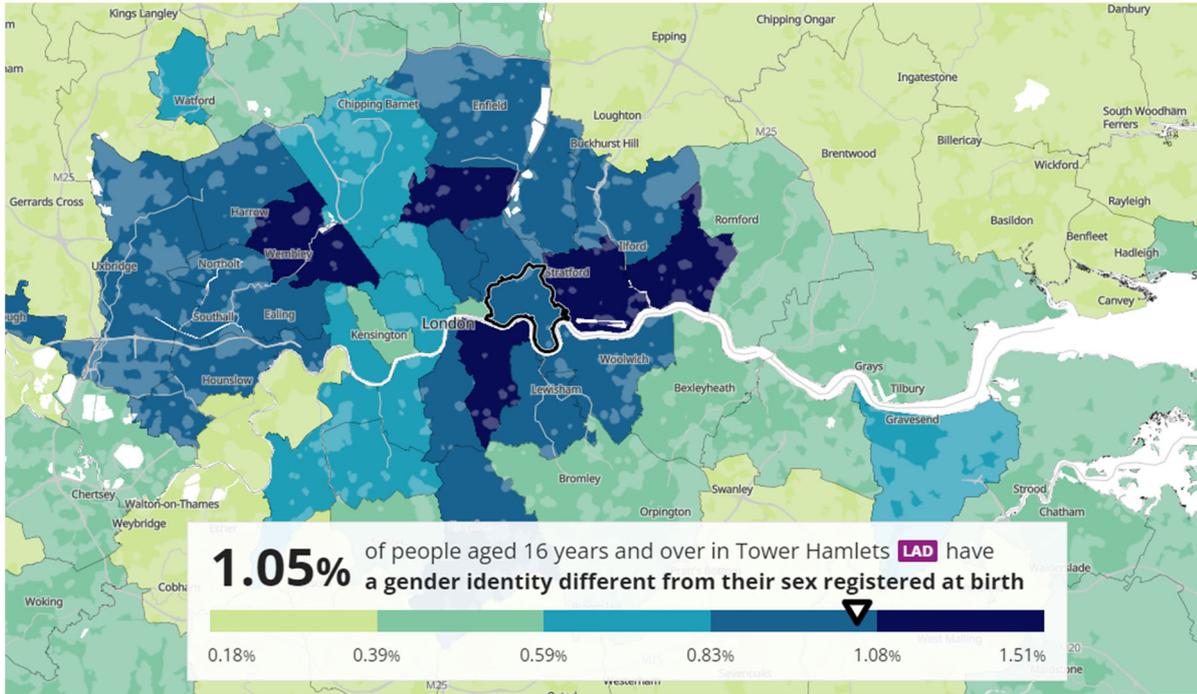
**Table 4-12 – Gender Identity in Tower Hamlets and London**

Gender Identity	Tower Hamlets	Tower Hamlets %	London	London %
Gender identity the same as sex registered at birth	229,263	90.7	6,479,664	91.2
Gender identity different from sex registered at birth but no specific identity given	1,438	0.6	32,753	0.5
Trans Woman	344	0.1	11,266	0.2
Trans Man	350	0.1	11,480	0.2
Non-binary	350	0.1	5,407	0.1
All other gender identities	161	0.06		0.05

4.13.2. **Figure 4-3** displays a comparison of gender identity across neighbouring London boroughs as well as the wider regional area.

<sup>20</sup> Housing Benefit and Council Tax Benefit (2013) <https://www.gov.uk/government/statistics/housing-benefit-and-council-tax-benefit-caseload-statistics-published-from-november-2008-to-present> (Accessed: 05/09/2023)

**Figure 4-3 - Portion of the LBTH population with a gender identity different from their sex registered at birth<sup>21</sup>.**



<sup>21</sup> Census Maps (2021) <https://www.ons.gov.uk/census/maps/choropleth/identity/gender-identity/gender-identity-4a/gender-identity-different-from-sex-registered-at-birth?lta=E06000023&lads=E09000030> (Accessed: 05/09/2023)

## 4.14 Baseline Summary

- As of 2021, LBTH have a population of 310,300, with 50.2% being male and 49.8% being female.
- LBTH is considered a relatively youthful borough with 52.9% of the population being aged 16-34.
- The total population in the LBTH area is set to increase across all age groups between 2018 and 2043, with an overall increase of 0.3%
- Under the Equality Act, 20.1% of the population of LBTH are considered to be disabled. Of this, 5.7% are considered to be limited a lot in engaging with day-to-day activities by their disability.
- The largest ethnic group represented in the borough is Asian, Asian British or Asian Welsh at 44.4% of the total population. Within this, the Bangladeshi community are the largest sub group, making up 34.6%.
- The majority of the population in LBTH identify as heterosexual. 4.% reported being gay or lesbian, and 2.5% bisexual.
- The greatest amount of live births in the LBTH area are from women in the age category 30-34, which is in line with London and England.
- The percentage of the population which is married or in civil partnership in LBTH is 8% lower than the regional average and 12.7% lower than the national average.
- 76.6% of the total population in LBTH were classed as economically active compared to 4.6% who were unemployed in 2021.
- Two LSOAs in LBTH fall within the top 10% most deprived neighbourhoods in the UK. These are Lansbury and St. Peter's.
- According to 2021 Census data, only 1% of the LBTH population have a gender identity different from their sex registered at birth.
- As detailed schemes and interventions come forward framed by the New Local Plan, these should be assessed in more detail to understand the potential impacts on specific local populations and vulnerable groups.

## 5 Impact Assessment

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### 5.1 Introduction

- 5.1.1. The New Local Plan sets out the vision for future development in the Borough over a 20-year period and includes the planning policies to help achieve this vision. It can do so by identifying locations that are suitable for good growth as well as for conservation and by setting clear guidelines for appropriate land uses, the form and design of development. The aim is to achieve good accessible placemaking that protects and improves resident's health and well-being, provides good quality homes, enhancing the economy and the environment.

#### Policies

- 5.1.2. The following proposed policies have been assessed from an equality perspective.

- 5.1.3. Policies have been split by their themes under the following categories:

- Delivering the Local Plan;
- Homes for the Community;
- Clean Green Future;
- People, Places and Spaces;
- Inclusive Economy and Good Growth;
- Town Centres;
- Community Infrastructure;
- Biodiversity and Open Space;
- Movement and Connectivity; and
- Reuse, Recycling and Waste.

### 5.2 Assessment methodology

- 5.2.1. The impact assessment will assess the proposed policies, based on their potential to directly or indirectly cause likely disproportionate impacts on people with the protected characteristics outlined previously. Impacts have also been considered with impact on those with levels of deprivation, as an indicator of socio-economic disadvantage.
- 5.2.2. Impacts on protected characteristic groups in particular are identified as positive, neutral or negative. Mitigation or recommendations are provided for each policy where this is applicable. Where the impact is deemed positive or neutral, any recommendations will outline how to ensure there is no negative impact or opportunities to further advance equality and inclusivity.
- 5.2.3. **Table 5-1** below provides the assessment key to the assessment **Table 5-2** below.

**Table 5-1 – Assessment Key**

Symbol	Impact
+	Positive
0	Neutral
-	Negative

## 5.3 Assessment Summary

- 5.3.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the Borough. The policies aim to address a wide range of issues, identified by the key themes above. An overall neutral impact has been given where positive impacts will affect the general public equally and not specifically those from protected characteristic groups.
- 5.3.2. The main protected characteristic groups that will particularly benefit include:
- Age – older people who have reduced mobility and require access to health and other services. Also, children who are likely to benefit from air quality improvements that numerous policies look to achieve;
  - Disability – people with a variety of disabilities will benefit from a more accessible environment; and
  - Deprivation – people from low-incomes who require access to employment, education and housing and people with underlying health issues.
  - Sex, Gender reassignment and Race – women and girls, gender diverse people, and people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.
- 5.3.3. Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:
- Age, Disability and Pregnancy and maternity – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups.
  - Deprivation – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

5.3.4. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:

- Religion or belief;
- Sexual orientation; and
- Marriage and civil partnerships.

**Table 5-2 – Summary of Policies and Equality Effects**

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
<b>Delivering the Local Plan</b>													
DV1 Areas of growth and opportunity within Tower Hamlets	0	0	0	0	0	0	0	0	0	0	0	+ Development will be focussed in highly accessible locations with good links to public transport, cycling and walking networks and town centres. New and improved facilities will likely be accessible and therefore beneficial to all borough residents.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV2 Delivering sustainable growth in Tower Hamlets	0	0	0	+	0	+	0	0	0	0	0	+ Development will be sustainability conscious and considerate of the council's goal of becoming a carbon neutral borough in 2045. Reduced GHG emissions associated with this goal will be beneficial to the respiratory health of the population. <u>Age, Disability</u> + Improvements to air quality and subsequent positive effects on respiratory health will be predominantly beneficial for the elderly, the young and disabled groups in the borough.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV3 Healthy communities	+	0	0	+	0	+	+	0	+	+	+	+ Development will be conscious of potential beneficial or adverse impacts on the population's health. Physical and mental wellbeing of the borough will likely be ensured this way. <u>Age, Disability</u> + Developments will include built and natural environments that are accessible. This will benefit the elderly and disabled groups with accessing open space as well as the public realm. <u>Gender</u>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>+ Improvements to built and natural environments will meet the needs of different genders, this will benefit both male and females within the borough.</p> <p><u>Deprivation, Race, Pregnancy and Maternity</u></p> <p>+ Improving high quality open spaces and community facilities will provide access to those who may currently be without access to these facilities.</p> <p>+ High quality open space and community facilities will improve opportunities for social interaction.</p>	
DV4 Planning and construction of new development	0	0	0	-	0	-	-	0	0	-	- High levels of development are set to occur in already densely inhabited areas of the borough. While the policy aims to ensure development will have minimal impact on the local environment and communities, it is likely that ongoing construction will have adverse effects on nearby residential receptors through noise and dust pollution.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV5 Developer contributions	0	0	0	0	0	0	0	0	0	0	Additional funds to the improvement of the environment and infrastructure in the borough will ensure sustainable development as set out in the Local Plan is being realised. This policy will therefore be beneficial to all members of the community in the borough.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV6 Promoting social value	+	+	0	0	+	0	0	0	+	+	<p>+ Added social value from development will bring additional community, culture and diversity benefits.</p> <p>+ Religion/ belief and Race</p> <p>Development will support social inclusion and equal opportunity within the borough which will positively impact community cohesion.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
DV7 Utilities and digital connectivity	0	0	0	+	0	+	0	0	0	0	<p>Improvements to utility infrastructure for new developments will be beneficial to all borough residents.</p> <p><u>Age</u></p> <p>+ Improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for university work.</p> <p><u>Age, Disability</u></p> <p>+ Enhanced efficiency of utilities such as heating and water will bring positive health impacts for vulnerable groups including the elderly and disabled.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV8 Site allocations	0	0	0	0	0	0	0	0	0	0	<p>The application of all Local Plan polices on site allocations containing development proposals will be beneficial to all groups in the borough.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
<b>Homes for the Community</b>												
HF1 Meeting housing needs	+/-	0	0	+	0	+	+	0	+/-	+/-	<p><u>Age, Deprivation, Disability</u></p> <p>The policies intention to meet the housing needs of the borough through ways that ensure the creation of mixed, inclusive and balanced communities will be beneficial to the general population. This will benefit those on lower incomes through provision of more housing, which will reduce competition in the housing market. Additionally there will be more availability</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>of social and affordable housing for those on lower incomes.</p> <p>Additionally, ensuring a mix of development size will ensure there is appropriately sized development for different occupier groups, who may need more or less space depending on their needs.</p> <p><u>Race</u></p> <p>The prioritisation of proposals for gypsy and traveller communities will benefit these communities.</p> <p><u>Deprivation, Gender and Race</u></p> <p>-There is potential for low levels of engagement from the community in which estate regeneration schemes are proposed. Areas in need of social housing are where factors such as low incomes and educational barriers and additional pressures such as second jobs and single-parent households are more common. Residents may be less inclined or able to engage with consultation due to pressure from other aspects of life. There could be various other reasons for low engagement, such as language barriers or physical and informational inaccessibility.</p>	
HF2 Affordable housing and housing mix	0	0	0	0	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ The policies target to maximise the delivery of affordable housing with a target of 50% of all new homes to be genuinely affordable will be beneficial to low-income groups who are unable to afford predominant housing availability throughout the borough. The emphasis on affordable family sized housing with a view to combat overcrowding in the borough is also beneficial to families with children.</p>	No mitigation measures have been outlined for this policy. .

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
HF3 Protection of existing housing	0	0	0	0	0	0	0	0	0	0	0	The policies intention to protect existing and safeguard the future supply of self-contained homes across the borough will be beneficial to the general population.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
HF4 Supported and specialist housing	0	0	0	+	0	+	0	0	0	0	0	The provision of specialist housing to offer supported living to those with additional needs will support a range of protected characteristics in the borough. The policy supports those who are homeless through the provision of shelters and transitional housing and older people through provision of nursing homes and care homes. Supported living will benefit these groups by ensuring their care and protection.	No mitigation measures have been outlined for this policy.
HF5 Gypsy and traveller accommodation	0	0	0	0	0	0	0	0	+	0	0	Gypsies and travellers are considered under this theme through safeguarding of the existing gypsy and traveller site at Old Willow Close. This population group will benefit from additional safety measures to their place of occupancy.	Should any additional accommodation be required as a result of improvements to the existing site the council will need to consider appropriate locations for this to avoid illegal sittings.  LBTH are currently awaiting the outcomes of the Greater London Authorities Gypsy and Traveller Accommodation Needs Assessment
HF6 Purpose-built student accommodation	0	0	0	+	0	+	0	0	0	0	0	<u>Age</u> + The policy supports the development of student accommodation in close proximity to its relevant higher education institution, and where it does not be detrimental to the cohesiveness of communities. This will be particularly beneficial to the student population in the borough as well as the long-term state of higher education and local economy in the borough.	Accommodation such as student accommodation can be conducive to noise pollution. Accommodation should be appropriately located so as to minimise adverse effects on other residential receptors.

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											<u>Disability</u> + It is also noted that 10% of rooms should be designed to be accessible, in line with the London Plan 2021. - An increased prevalence of student accommodation will likely result in increased noise pollution in the surrounding area. This will have adverse effects for the wellbeing of all residents	
HF7 Large-scale purpose-built shared living	0	0	0	+	0	0	0	0	0	-	<u>Age</u> + There are benefits to those occupying communal residences, particularly older people living on their own, in terms of reduction of social isolation and increased participation in activities which in turn has health benefits. <u>Deprivation</u> - The development of large-scale purpose-built shared living has the potential to compromise the generation of affordable housing throughout the borough. This will be disadvantageous to lower income groups who rely on the provision of affordable housing for their residential needs.	Large-scale buildings often have potential to infringe on the residential amenity of an area. Mitigation measures should be put in place to ensure the built environment does not have adverse effects for any population group. Large-scale buildings must also contain accessibility features in order for those who are disabled or with mobility impairments to successfully reside here.
HF8 Housing with shared facilities (houses in multiple occupation)	0	0	0	+	0	0	0	0	0	+	<u>Age</u> + HMOs are a beneficial tenancy options for younger residents who are unable to or choose not to live in traditional housing. <u>Deprivation</u> + HMOs also offer a shared room rate housing benefit. This is especially beneficial to low-income groups who are reliant on affordable means of housing.	No mitigation measures have been outlined for this policy.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
HF9 Housing Standards and Quality	0	0	0	+	0	+	+	0	0	+	<p><u>Age, Disability, Pregnancy and Maternity, Deprivation</u></p> <p>+ Safe living conditions may be of particular importance to older people, disabled people and expectant mothers who inherently experience raised wellbeing requirements. Those on lower incomes are more likely to be living in social or rented accommodation and will benefit from well designed and maintained housing stock.</p>	No mitigation measures have been outlined for this policy.
<b>Clean Green Future</b>												
CG1 Mitigating and adapting to a changing climate	0	0	0	+	0	+	0	0	0	0	<p>This policy will contribute to improving climate resilience in the borough, and therefore brings benefits for all members of the public.</p> <p><u>Age, Disability</u></p> <p>+ Improvements to air quality through this policy will be particularly beneficial to disabled groups, the young and the elderly.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG2 Low energy buildings	0	0	0	+	0	0	0	0	0	+	<p><u>Age</u></p> <p>+ Provision of low energy and energy efficient buildings will help to support better quality housing stock now and for future first time buyers.</p> <p><u>Age, Disability</u></p> <p>+ Provision of low energy buildings will also help to improve residents' health, particularly elderly and disabled residents, by reducing exposure to cold and air pollutants. Younger groups will also experience health benefits from the development of buildings and subsequent reduction in health damaging environmental factors such as mould.</p> <p><u>Deprivation</u></p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
												<p>+ This policy also presents current energy/ cost savings for residents, especially important for those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p>	
CG3 Low carbon energy and heating	0	0	0	+	0	+	0	0	0	+	<p><u>Deprivation</u></p> <p>+ Low carbon energy and heating will contribute to more energy efficient homes and reduce expenditure on energy bills. This will benefit everyone, but especially those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p> <p><u>Age, Disability</u></p> <p>+ Provision of low carbon energy and heating will also help to improve residents' health, particularly elderly and disabled residents, by reducing exposure to cold and air pollutants.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.	
CG4 Embodied carbon, retrofit and the circular economy	0	0	0	+	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ Retrofitting existing housing stock will contribute to more energy efficient homes and reduce expenditure on energy bills. This will benefit</p>	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.	

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>everyone, but especially those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ Retrofitting with a view for longevity will also aid in reducing maintenance costs associated with housing.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p> <p><u>Age</u></p> <p>+ Retrofitted properties will help to support better quality housing stock now and for future first time buyers.</p>	Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
CG5 Overheating	0	0	0	+	0	+	0	0	0	0	<p><u>Age, Disability</u></p> <p>+ Climate change is likely to result in increased heating events, therefore the prevention of overheating through this policy is essential, especially for elderly, young, and disabled residents who are vulnerable to overheating.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG6 Managing flood risk	0	0	0	0	0	0	0	0	0	0	<p>+ This policy will contribute to improving climate resilience in the borough through consideration of flood risk in development, and therefore brings benefits for all members of the public, especially those residing in flood zones.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG7 Sustainable drainage	0	0	0	0	0	0	0	0	0	0	<p>No protected groups are identified as specifically impacted.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
CG8 Water efficient design	0	0	0	0	0	0	0	0	0	0	<p>+ This policy is likely to result in indirect positive effects on water quality due to the outlined measures to minimise surface runoff from sewers. This may indirectly improve local water quality on a small scale, bringing minor benefits to the entire borough.</p> <p>+ Ensuring blue spaces like Lea River Park are well-designed and accessible will maximise opportunities for public use and enjoyment for all borough residents.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG9 Air quality	0	0	0	+	0	+	+	0	0	0	<p>+ The policy involves encouragement of sustainable movement patterns, including the use of public and active transport modes. Those engaging in active transport will likely experience physical and mental health benefit as a result.</p> <p>+ The policy also contributes to indirect positive effects upon biodiversity through improvements to air quality. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Age, Disability, Pregnancy/maternity</u></p> <p>+ Young children, older people, pregnant women, and those with respiratory and underlying health conditions are particularly sensitive to changes in air quality and will benefit from improvements more than other groups.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG10 Noise and vibration	0	0	0	+	0	+	0	0	0	0	<p>+ This policy will add to the enjoyment of the community for all residents.</p> <p>+ The policy includes measures to minimise construction disturbance which is likely to have minor positive indirect effects on local biodiversity. Improved environmental</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Age, Disability</u></p> <p>+ People with autism can be especially sensitive to changes in noise. This group will especially benefit from noise mitigation. Children and young people could also be affected if work is undertaken in the vicinity of education facilities.</p>	
CG11 Contaminated land	0	0	0	0	0	0	0	0	0	0	+ This policy will improve the quality of land in the borough, and therefore brings benefits for all members of the public.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
<b>People, Places and Spaces</b>												
PS1 Design- and infrastructure-led approach to development	+	0	+	+	0	0	+	0	0	0	<p><u>Sex and Gender, Gender reassignment</u></p> <p>+ The policy outlines community engagement measures to ensure development suits community needs, and gender inclusive design.</p> <p><u>Age, Pregnancy/Maternity</u></p> <p>+ The policy contributes positive impacts to Tower Hamlets as it supports the growing population of the borough.</p> <p>- An increase in housing density through this policy will often support the development of tall buildings. High rise living can be conducive of social isolation and present barriers to suitable open space for all residents, resulting in poor mental health outcomes.</p>	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS2 Tall Buildings	+	0	0	0	0	+	-	-	0	0	<p>+ This policy will benefit the entire borough community.</p> <p>+ Indirect improvements to mental health are made through the communal open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.</p> <p>+ The provision of communal open space may enhance local natural capital. The policy also requires development to have no adverse effect on biodiversity in the local area, preserving species and habitats. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Disability</u></p> <p>+ Improvements to the accessibility of high rise developments to those with disabilities is likely to improve living standards and reduce social isolation for those who are disabled and living in high rise developments.</p> <p><u>Sex and Gender</u></p> <p>+ The consideration of gender-inclusive design is likely to improve feelings of safety within high rise developments.</p> <p><u>Marriage and civil partnership</u></p> <p>- High rise living can be a socially isolating experience, particularly for those living alone without a partner or family. Limited socialisation opportunities are presented by such living arrangements, with residents subsequently feeling a lack of social support and sense of belonging within the community.</p>	<p>Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.</p> <p>Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.</p>

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p><u>Pregnancy/maternity</u></p> <p>- There is a high perception of anti-social behaviour in association with communal areas of tall buildings. A low sense of control over the communal setting of one's residence can be linked to poor mental health outcomes. This is particularly significant for parents with young children who may feel the safety of their children is compromised by their residential location.</p> <p>-/+ High rise living can promote barriers to suitable open space for parents with young children. Point J of this policy should go some way to alleviate this risk through the provision of high quality private communal open space, play areas and public realm which occupants of the building can use.</p>	
PS3 Securing design quality	0	0	0	+	0	+	0	0	0	0	<p>+ This policy is likely to result in improved housing, particularly through improvements to privacy for residents, creating habitable rooms and creating residential resilience to overheating. These aspects will help to support better quality housing stock now and for future first time buyers.</p> <p><u>Disability, Age</u></p> <p>+ Accessible and adaptable buildings will improve access for elderly and disabled users who may struggle to move within buildings.</p> <p>+ The policy also ensures the health and wellbeing of vulnerable users, this includes a variety of groups, however predominantly elderly, disabled, or those with long term health conditions.</p>	Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS4 Attractive streets, spaces and public realm	+	0	0	0	0	0	0	0	0	0	<p>+ This policy promotes a range of public spaces for community use within developments, improving the local facilities available for growing communities in Tower Hamlets. This policy will therefore benefit the entire borough community.</p> <p><u>Sex and Gender</u></p> <p>+ The policy also improves safety and reduces the fear of crime through providing well-lit routes at night time, an aspect that is of particular importance to women at night.</p>	Street features and public realm that are frequented by vulnerable groups such as children and low-income groups should consider avoiding locating nearby advertisement content including hot food takeaway and betting.
PS5 Creating inclusive places	+	0	+	+	+	+	+	0	+	0	<p><u>Sex and Gender, Gender Reassignment</u></p> <p>+ This policy involves lighting and signage measures, as well as design to make areas safe for all genders, particularly reducing the fear of crime. Resultant positive effects are through improvements to equalities, ensuring all genders are able to access community spaces equally.</p> <p><u>Sex and Gender, Sexual Orientation, Disability, Race</u></p> <p>+ The policy aims to involve a number of social groups within the design process and utilise co-design. This will improve the nature of spaces and ensure they reflect the needs of the community.</p> <p><u>Age</u></p> <p>+Improving seating in open spaces will provide opportunities for the elderly to sit and rest, improving accessibility of open spaces.</p>	The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.
PS6 Heritage and historic environment	0	0	0	+	0	+	+	0	0	0	<p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>personal sense of place can build with time and association with a particular area.</p> <p><u>Age, Disability, Pregnancy/maternity</u></p> <p>+ Improvements to uneven surfaces will improve the accessibility of historic locations to those who may struggle with historic surfaces, such as the elderly, disabled users, and those with mobility aids, as well as parents with pushchairs.</p>	information once development sites have come forward.
PS7 World heritage sites	0	0	0	+	0	0	0	0	0	0	<p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A personal sense of place can build with time and association with a particular area.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
PS8 Shaping and managing views	0	0	0	0	0	0	0	0	0	0	<p>+ The maintenance of local landscape and views associated with this policy will benefit the entire borough community, particularly not detracting from people's wellbeing and mental health.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
PS9 Shopfronts	0	0	0	0	0	+	0	0	0	0	<p>This policy aims to benefit the whole community by promoting a positive visual impact of shopfronts on the street and improving the economic diversity within the Borough at the same time. No protected groups are identified as specifically impacted.</p> <p>+The requirement of shopfronts to not be excessive or visually discordant, including the discouragement of neon and electronic displays is particularly sensitive to those with neurodivergence.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS10 Advertisements, hoardings, and signage	0	0	0	0	0	-	-	0	0	0	<u>Disability and pregnancy and maternity</u> - Free standing advertisements can present an obstacle on the footway for disabled people as well as parents using pushchairs.	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.  Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered.  Well-designed advertisement can aid in reducing sensory overload for the neurodivergent population of the borough. Enhancement of appearance should not compromise the usability of neurodivergent people.
PS11 Siting and design of telecommunications infrastructure	0	0	0	0	0	0	0	0	0	0	No protected groups are identified as specifically benefiting or disadvantaged by this policy.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
<b>Inclusive Economy and Good Growth</b>												
EG1 Creating investment and jobs	0	0	0	0	0	0	0	0	0	+	<u>Deprivation</u> + The policy provides improved job opportunities for all groups of the working population, including those with current low levels of education. With new employment prospects low-income groups in the borough will have greater opportunities to earn and save disposable income. Increased opportunities and new income will likely reduce levels of stress and anxiety associated with the rising cost of living.	Jobs creation must be evenly distributed across space within the borough to ensure all groups are able to easily access employment.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
EG2 New employment space	0	0	0	+	0	0	0	0	0	+	<p>+ New employment spaces will encourage outside investment and increase the number of jobs available in the borough, boosting the local economy. This policy will benefit the entire borough community.</p> <p><u>Age, Deprivation</u></p> <p>+ New employment spaces locating along major public transport routes with good accessibility is particularly beneficial to young and low income groups who likely will not have access to private vehicles to access employment.</p>	New employment spaces should be a diverse and equal mix of office space and spaces for small businesses to thrive.
EG3 Affordable workspace	0	+	0	+	0	0	0	0	+	0	<p><u>Religion, Race</u></p> <p>+ Affordable workspaces will support the generation and maintenance of small businesses, likely providing opportunities for different cultures and improving equalities in the borough overall.</p> <p><u>Age</u></p> <p>+ Affordable workspaces are also beneficial to young people setting up SME's who have a low income to do so.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
EG4 Loss and redevelopment of employment space	0	0	0	0	0	0	0	0	0	0	<p>All community members will benefit from the preservation of work spaces and subsequent maintenance of employment opportunities.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
EG5 Railway Arches	0	+	0	0	0	0	0	0	+	+/-	<p>+ This policy includes measures to ensure the accessibility to the railway arches by walking and cycling must be included within developments. This contributes to positive effects on accessibility due to walking permeability through the area. By ensuring accessibility of active travel, the overall</p>	The accessibility of disabled groups must also be considered when ensuring the walkability of the area. Footpaths must not be obstructed to allow space for wheelchair users to travel through.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
											<p>health of the community in the borough will likely improve.</p> <p><u>Deprivation</u></p> <p>+ This policy allows those who rely on active and public transport modes, such as those on low incomes, to reach the area.</p> <p>- By supporting the Railway arches provision of low-cost work spaces that fall outside of District Centres and Central Activity Zones (CAZ) those who are reliant on these spaces for work will not be subject to the same benefits that may be generated by investment in the CAZ as those who can afford workspaces within the designations.</p> <p><u>Religion, Race</u></p> <p>+ Preservation of the railway arches for their varying cultural uses is beneficial to ensuring diversity and equality are upheld in the borough.</p>		
EG5 Data centres	0	0	0	+	0	0	0	0	0	0	<p><u>Age</u></p> <p>+ Improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for university work.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.	
<b>Town Centres</b>													
TC1 Supporting the network and hierarchy of centres	0	0	0	+ / -	0	0	0	0	0	0	+	<p>Improvements to centres will likely suit community needs, benefitting the entire borough community. A thriving, diverse community will also help to reduce social isolation for all borough residents.</p>	Developments should seek to improve the public realm.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p><u>Age</u></p> <p>+ Boosted vitality and improvement to the night time economy provides spaces for socialisation, entertainment and culture that young and middle aged groups will directly benefit from.</p> <p><u>Age</u></p> <p>-There is potential for negative effects on the mental wellbeing of local residents, especially the elderly, as a result of the night time economy, and noise during night time hours.</p> <p><u>Deprivation</u></p> <p>+ The policy directly provides opportunity for employment in retail and hospitality across Tower Hamlets, including for night-time workers as a result of the night time economy. A large proportion of town centres in Tower Hamlets provide night time economy areas, improving job opportunities, especially for low-income groups seeking employment.</p>	
TC2 Protecting the diversity, vitality and viability of town centres	0	+	0	0	0	0	0	0	0	0	<p>+ Preserving town centre usage is likely to attract visitors, increase footfall and boost the economy of town centres. This policy will therefore benefit the entire borough community.</p> <p><u>Religion, Race</u></p> <p>+ Diversity preservation will ensure that different communities in the borough have their needs met with specific services and amenities.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
TC3 Town centre uses outside centres	0	0	0	0	0	0	0	0	0	0	<p>The policies aim to direct new retail development towards existing centres will likely result in a failure to meet growing demand for retail in areas outside of Metropolitan, District and Neighbourhood Centres. Lowered access to</p>	Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres, and is necessary to meet the immediate convenience needs of local people and/or support the

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											services will be disadvantageous to the wellbeing of residents in these areas.	function of designated employment locations.
TC4 Markets	0	0	0	0	0	0	0	0	+	0	<u>Race</u> + Preserving markets ensures a cultural diversity in the borough's townscape and economy, benefitting the entire borough community.	Developments should seek to improve the public realm.
TC5 Food and drink	0	0	0	+	0	0	0	0	0	0	New eating and drinking facilities are likely to provide places for socialisation which will improve the mental wellbeing of all borough users.  <u>Age</u> + Under this policy, proposals for hot food takeaway must not be within 400 metres walking distance from an existing or proposed school and/or local authority leisure centre. This inclusion will ensure the physical health and wellbeing of school aged children throughout the borough.	This policy requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.
TC6 Entertainment uses	0	+	0	+	0	0	0	0	0	0	+ Commercial leisure businesses can act as attractors and support the vitality and viability of town centres. Increase footfall will likely boost the economy of town centres, benefitting the entire borough community.  <u>Age, Religion/belief</u> + Commercial businesses will not be located in close proximity to a school, sensitive community, or cultural facilities including places of worship. Sensitive receptors making use of these facilities will not be adversely affected by the new presence of commercial businesses.	Developments should seek to improve the public realm.  Hot food takeaway and gambling premises should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
TC7 Evening and night-time economy	+	0	+	+	0	+	0	0	0	+	<p><u>Age, Disability</u></p> <p>+ People can be especially sensitive to noise disturbance due their age or having disabilities or neurodivergence, such as autism. This policy will allow the planning system to mitigate noise impacts of a vibrant evening economy.</p> <p><u>Sex and Gender, Race</u></p> <p>+ A vibrant evening economy requires additional safety measure to be put in place. This could help to protect people vulnerable to crime at night such as women, LGBTQ+ people and people with different ethnicities. It is noted that the policy will only allow proposals to be considered where there is a high level of public transport accessibility.</p> <p><u>Deprivation</u></p> <p>+ Facilitating the evening economy will bring economic benefits to the borough in terms of employment and income.</p>	The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis.
TC8 Short-stay accommodation	0	0	0	0	0	0	0	0	0	+	<p>+ This policy promotes visitors to Tower Hamlets and is likely to improve the visitor economy, benefitting the entire borough community, without undermining housing allocation, and therefore reducing housing availability.</p> <p>- The policy states that development proposals for short-stay accommodation must not compromise the supply of C3 self-contained homes only. Alternative housing including family-sized homes and affordable housing may therefore be threatened by short-stay accommodation development.</p>	Ensure accessibility standards are adhered to in short-stay accommodation.

**Community Infrastructure**

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
C1 Supporting community facilities	0	0	0	+	0	0	+	0	0	0	<p>+ The policy outlines the maintenance and enhancement of community facilities, including healthcare and sports and leisure facilities. This will likely improve physical health through encouraging physical activity, as well as improving mental wellbeing through improving spaces for socialisation and encouraging activity for all community members. This policy will encourage a sense of community and reduce social isolation by maintaining existing facilities, and prioritising new development in accessible locations.</p> <p><u>Age, Pregnancy/Maternity</u></p> <p>+ Older people and pregnant women or parents will particularly benefit from improved provision of and support from health and social care facilities, pharmacies.</p>	The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.
C2 Existing community facilities	0	0	0	+	+	0	0	0	0	0	<p>+ The retention and enhancement of existing communities, as well as the use of temporary facilities while existing facilities are closed for extended periods of time, will be beneficial to all borough community members.</p> <p><u>Disability</u></p> <p>+ This policy involves the development of accessible, inclusive new facilities, including allowing public access. This is likely to improve access to facilities to all groups of the public, including disabled users.</p> <p><u>Age</u></p> <p>+ Where school extensions are proposed and the development of play spaces is included, young children will experience positive mental and physical health benefits.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
C3 New and enhanced community facilities	0	0	0	+	0	0	0	0	+	+	<p>+ This policy will bring about benefits for the entire borough community in the form of improved physical health through providing new community facilities and leisure facilities. This also improves mental wellbeing through new social facilities.</p> <p><u>Age</u></p> <p>+ New early education and care facilities will also be located in areas of acceptable air quality, indirectly improving health. This is particularly of note as young people and older people are most at risk of respiratory illnesses such as asthma due to poor air quality.</p> <p><u>Race</u></p> <p>+ Improvements to services and access to them is particularly important to the Bangladeshi community within the borough, who demonstrate a prioritisation of improved services and activities for young people, access to a place of worship, access to healthy eating programmes and public transport facilities like bus stations.</p>	New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.
C4 Public houses	0	0	0	+	0	0	0	0	0	0	<p>+ This policy preserves public houses and provides beneficial community spaces and socialisation venues for the entire local population.</p> <p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A personal sense of place can build with time and association with a particular area or venue, and so the preservation of public houses is beneficial. Young people, especially students who may also experience loneliness and social isolation will also experience positive effects to socialisation opportunities through this policy.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											- No mitigation against additional noise pollution as a result of Public Houses is set out by this policy, and so adverse effects on nearby residential receptors can be expected.	
C5 Arts and culture facilities	0	0	0	0	0	0	0	0	0	0	+ Preserving arts and culture facilities ensures diversity is maintained and enhanced in the borough, benefitting all community members.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
<b>Biodiversity and Open Space</b>												
BO1 Green and blue infrastructure	+	0	0	+	0	0	+	0	0	+	<p>+ The community will benefit from reducing pollution, improving air quality, enhancing biodiversity, screening noise, improving natural drainage, reducing flood risk, providing benefits to mental and physical health. The promotion of space for cultural activities under this policy will also be beneficial to community cohesion throughout the borough.</p> <p><u>Deprivation</u></p> <p>+ Access to open space is particularly beneficial to low income groups who may not have access to privately owned green space.</p> <p><u>Pregnancy and maternity</u></p> <p>+ Green spaces, particularly those with play spaces included are also beneficial to parents with young children as it enables them to access opportunities for both physical activity and socialisation.</p> <p><u>Sex and Gender, Age</u></p> <p>+ Inter-generational open space with a range of activity spaces included are beneficial to children</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											and young people, as well as adults and the elderly, providing spaces for various sport types and increasing physical activity opportunities. Additionally, designing spaces with women and girls in mind will likely increase the feelings of safety in open spaces and encourage physical activity and socialisation in these spaces.	
BO2 Open spaces and the green grid networks	0	0	0	+	0	+	+	0	+	+	<p><u>Age</u></p> <p>+ Preservation and creation of open space will benefit younger people by providing quality recreational space.</p> <p><u>Disability</u></p> <p>+ Green spaces provide particular benefits to people seeking to use these areas for management mental health and/or stress.</p> <p><u>Pregnancy/maternity</u></p> <p>+ Quality green space is important for parents with push chairs. Play areas benefit this group by providing a safe recreational space for children.</p> <p><u>Deprivation</u></p> <p>+ High quality parks and open spaces will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p> <p><u>Race</u></p> <p>+ Access to open space is especially important to the Bangladeshi community, who currently are the most likely group in the borough to say that they do not have access to spaces with opportunities for play and recreation, the main reason being the lack of parks and green spaces in their local area.</p>	<p>New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
BO3 Water spaces	0	0	0	0	0	0	0	0	0	0	0	+ Improved public access to high quality water spaces will be beneficial to the mental wellbeing of the community in the borough.	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO4 Biodiversity and access to nature	0	0	0	0	0	+	0	0	0	0	+	<p>This policy aims to provide benefits to all members of the public.</p> <p><u>Disability</u></p> <p>+ The maintenance and enhancement of a greener landscape ecological value can add to sense of place. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas, particularly people seeking to manage mental health and/or stress.</p> <p><u>Deprivation</u></p> <p>+ A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p>	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO5 Urban greening	0	0	0	0	0	0	0	0	0	0	+	<p>Additional planting around the borough will improve the environmental surroundings, contributing to improved mental wellbeing for all community members.</p> <p><u>Deprivation</u></p> <p>+ A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p> <p>+ The provision of allotments will be particularly beneficial to low income groups who do not have access to private gardens with which to grow food crops for healthy living purposes.</p>	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
BO6 Play and recreation spaces	0	0	0	+	0	+	+	0	0	+	<p><u>Pregnancy/maternity</u></p> <p>+ Quality recreational spaces are important for parents in entertaining and socialising children. Play areas benefit this group by providing a safe recreational space for children.</p> <p><u>Age, Disability</u></p> <p>+ Play is an important component of the physical and mental development of children. Creating safe spaces for children to socialise and explore will benefit the overall health of the next generation in the borough. This includes providing spaces for disabled children to play and utilise play equipment, as well as providing quiet seating and visual aids, ensuring disabled children are able to utilise play spaces and socialise.</p> <p><u>Deprivation</u></p> <p>+ Providing play space nearby to community amenities will benefit people living in high density residential areas, or areas of high deficiency to play space, who may not have access to private gardens or outside space.</p>	<p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>The policy might encourage business and facilities to open up in play and recreational spaces as well as ensure active travel routes increase the busyness of parks. A busier, more vibrant environment will lessen the prevalence of idle parks that promote fear in women, especially mothers.</p>
BO7 Food Growing	0	0	0	0	0	0	0	0	0	+	<p>+ Food growing can generate opportunities for socialisation and cross-cultural engagement in the community, benefitting the mental wellbeing of all those taking part.</p> <p><u>Deprivation</u></p> <p>+ Community food growing may be helpful to those living on low incomes in the area.</p> <p>+ The provision of allotments will be particularly beneficial to low income groups who do not have access to private gardens with which to grow food crops for healthy living purposes.</p>	<p>Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
<b>Movement and Connectivity</b>												
MC1 Sustainable transport	+	0	0	0	0	+	0	0	+	+	<p>+ The encouragement of active travel results in direct positive effects for the physical and mental health of the population. A modal shift away from public transport will also likely reduce air pollution, indirectly positively impacting physical health.</p> <p><u>Disability</u></p> <p>+ This policy is likely to improve access to all users, including those with mobility issues.</p> <p><u>Deprivation</u></p> <p>+ Improving public and active transport also allows those on low incomes to access further areas of the Borough. The policy aims to reduce severance and increase permeability across the Borough. Greater ease of transport will improve employment opportunities for those unable to afford private transport in the borough.</p> <p><u>Sex and gender, Race</u></p> <p>+ Improvements to the safety and accessibility of active transport modes such as cycling will encourage uptake by less frequent users such as women and ethnic groups.</p>	<p>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.</p> <p>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.</p>
MC2 Active travel and healthy streets	+	0	0	+/-	0	+/-	+	0	+	+	<p><u>Age</u></p> <p>+ Older people could particularly benefit from easier active travel, due to the associated health benefits.</p> <p><u>Disability</u></p> <p>+ Better connectivity between footways/cycleways and public transport will particularly benefit people who are unable to cycle.</p>	<p>Active travel infrastructure should be accessible and inclusive.</p> <p>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
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											<p><u>Age/ Disability</u></p> <p>- Implementing measures that encourage reduced car dependency could impact on the ability of those with limited mobility to access services.</p> <p>+ Segregating pedestrian and cycle lanes will improve the safety of users, particularly those who may be hard of hearing or may not be able to see other users. This will improve safety for these users, particularly elderly and disabled users and parents with pushchairs.</p> <p><u>Deprivation</u></p> <p>+ Active travel brings benefits that add to the general health and wellbeing of the community.</p> <p><u>Sex and gender, Race</u></p> <p>+ Improvements to the safety and accessibility of active transport modes such as cycling will encourage uptake by less frequent users such as women and ethnic groups.</p>	<p>charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p>
MC3 Impacts on the transport network	+	0	+	+	0	+	0	0	0	0	<p>This policy considers improvements to air quality through new developments, generating positive impacts on the respiratory health of the boroughs population.</p> <p><u>Sex and gender, Gender reassignment, Age, Disability</u></p> <p>+ The inclusion of both transport assessments and Active Travel Zone (ATZ) assessments will consider safety and night-time uses of active travel routes. This will assist in developing routes where users feel safe, and encourage utilisation of these routes for vulnerable groups, including women and girls, gender diverse people, children and older people, and people with disabilities.</p>	<p>No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
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MC4 Parking and permit-free	0	0	0	-/+	0	-/+	-/+	0	0	-/+	<p>This policy involves the provision of electric vehicle (EV) charging in new developments. Encouragement of sustainable vehicles usage is likely to reduce GHGs from private vehicles, improving air quality and the overall respiratory health of the population. Provision is also supported for disabled parking.</p> <p><u>Deprivation</u></p> <p>+ The policy also includes requirements for secure cycle parking which is likely to reduce bicycle theft in Tower Hamlets. This is beneficial for those who's only accessible mode of transport as a result of low-income is cycling.</p> <p>- This policy supports the maximisation of parking in some locations with low transport accessibility. This could see the increase in private vehicle use in certain locations, rather than support improvements to sustainable transport. This may disproportionately affect lower income groups.</p> <p><u>Age and Disability and Pregnancy and maternity</u></p> <p>- EV charging can present barriers to the elderly and those with disabilities, through trailing cables, parking bays being too narrow.</p> <p>- The policy outlines car free development and a reduction in residential car parking within areas of good public transport accessibility. This may restrict accessibility for those with disabilities parents with pushchairs who may require use of a</p>	<p>It is recommended that the Purple Badge Scheme is implemented to ensure there will be no negative impacts on protected groups, such as disabled people.</p> <p>Cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes as per the London Cycling Design Standards.</p> <p>Management should protect priority bays to maintain accessibility for protected groups.</p> <p>EV charging points should adhere to the British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022)<sup>22</sup>.</p>

<sup>22</sup> British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022) [online] available at: <https://www.bsigroup.com/en-GB/standards/pas-1899/>

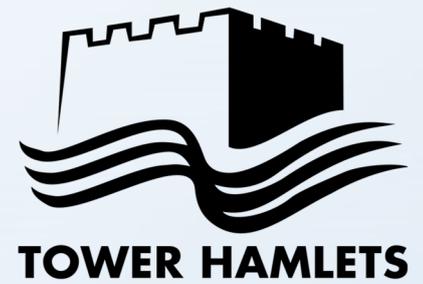
Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
												car and therefore limit accessibility, disproportionately affecting these groups.	
MC5 Sustainable delivery, servicing and construction	0	0	0	0	0	0	0	0	0	0	0	This policy considers improvements to air quality through new developments using sustainable freight through water, rail and road (zero emission vehicles), generating positive impacts on the respiratory health of the boroughs population.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
<b>Reuse, Recycling and Waste</b>													
RW1 Managing our waste	0	0	0	0	0	0	0	0	0	0	+	<u>Deprivation</u> + Maximising the capacity and efficiency of waste facilities will improve the streetscape around flats and higher density residential areas. This could bring benefits to aesthetics, accessibility and perception of crime by reducing street waste storage areas.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
RW2 New and enhanced waste facilities	0	0	0	0	0	0	0	0	0	0	0	+ The integration of new waste facilities into local landscape settings will likely result in minor positive effects on landscape setting. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.	New waste facilities to be constructed and utilise existing brownfield sites to reduce negative biodiversity and landscape impacts associated with new development.
RW3 Waste collection facilities in new development	0	0	0	0	0	0	0	0	0	0	0	+ Through improved collection systems and encouragement of recycling, reductions in overall waste generation brought about by this policy is likely to bring indirect minor improvements to the landscape and biodiversity of the borough. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.	Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.



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London Borough of Tower Hamlets

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# **Local Plan Integrated Impact Assessment**

**Appendix I: Health Impact Assessment**



London Borough of Tower Hamlets

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# Local Plan Integrated Impact Assessment

## Appendix I: Health Impact Assessment

Type of document (version) **Public**

Project no. **70103752**

Our Ref. No. **002**

Date: **June 2024**

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# Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft for LBTH	Final for Regulation 18	Draft for Regulation 19	
Date	September 2023	October 2023	June 2024	
Prepared by	Emily Bonnett	Emily Astins Emily Bonnett	Charlotte Town Jasmine Humphrey	
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Project number	70103752	70103752	70103752	

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# 1 Introduction

---

## 1.1 Overview

- 1.1.1. The London Borough of Tower Hamlets (LBTH) is currently preparing a New Local Plan (NLP), which will replace the Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits adopted in 2020<sup>1</sup>. The Tower Hamlets NLP will comprise five sub-areas, as planning functions for the London Legacy Development Corporation (LLDC) in the north-east of LBTH are expected to be returned to LBTH in 2024. The sub-areas are City Fringe, Central Area, Lower Lea Valley, Isle of Dogs and South Poplar, and Hackney Wick and Fish Island (current LLDC area).
- 1.1.2. An Integrated Impact Assessment (IIA) has been undertaken to ensure that sustainability aspects are incorporated into the NLP. The IIA enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. This process also helps to simplify outcomes and recommendations for policymakers.
- 1.1.3. As part of the IIA, a Health Impact Assessment (HIA) has been undertaken to assess the impacts of the NLP on human health in LBTH, and the likely effects on health outcomes in the local population.

The outcomes of the HIA have informed the IIA.

## 1.2 Local Plans

- 1.2.1. Section 3 of the National Planning Policy Framework (NPPF)<sup>2</sup> requires that each local planning authority should prepare a local plan for its area, which guides decisions on future development proposals and addresses the needs and opportunities of the area.
- 1.2.2. Topics that local plans usually cover include housing, employment and infrastructure. They also identify where development should take place and areas where development should be restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.
- 1.2.3. The NPPF states that the '*planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities*'.

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<sup>1</sup> Tower Hamlets Council (2020) Tower Hamlets Local Plan 2031. Available at: [https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH\\_Local\\_Plan\\_2031\\_accessibility\\_checked.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf)

<sup>2</sup> Ministry of Housing, Communities and Local Government Framework, National Planning Policy Framework, 2021 [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

### 1.3 Integrated Impact Assessment

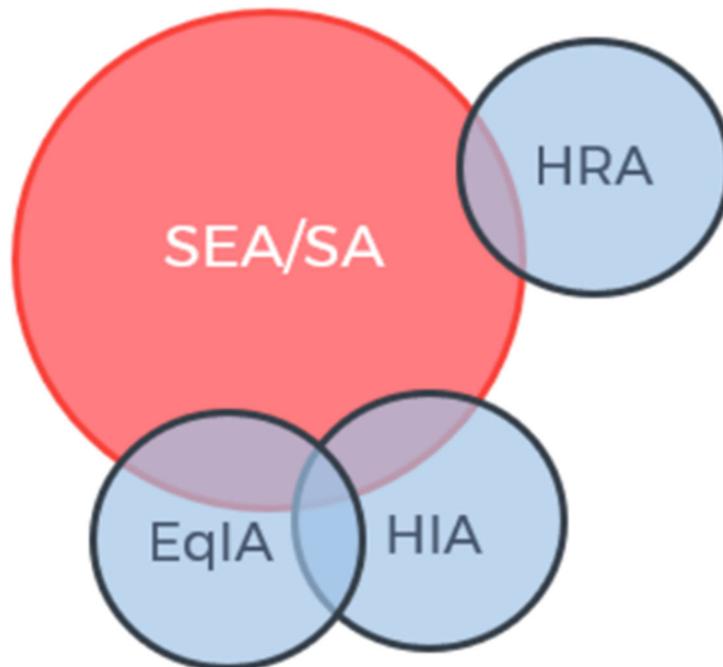
1.3.1. The IIA combines the following assessment processes:

- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA);
- Equalities Impact Assessment (EqIA);
- Health Impact Assessment (HIA); and
- Habitats Regulations Assessment (HRA).

1.3.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in the assessment itself, as many of the issues covered in the different forms of assessment overlap.

1.3.3. This process also helps to simplify outcomes and recommendations for policymakers. This is demonstrated in **Figure 1-1** below. More detail on each of the components of the IIA have been described below.

**Figure 1-1 - IIA and Component Processes**



## 2 Health Impact Assessment

---

### 2.1 Introduction

- 2.1.1. HIA is a systematic approach to identifying the differential health and wellbeing impacts, both positive and negative, of projects, plans or strategies.
- 2.1.2. HIA uses both qualitative and quantitative evidence, including public and other stakeholders' perceptions and experiences, as well as public health knowledge. It is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore looks at how health and social inequalities might be reduced or increased by a proposed project or plan.
- 2.1.3. HIA has been defined as:
- “...a combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population”<sup>3</sup>.*
- 2.1.4. In this context, ‘health’ is defined by the World Health Organisation as:
- “...a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity”<sup>4</sup>.*
- 2.1.5. Health determinants are the personal, social, cultural, economic and environmental factors that influence the health of individuals or populations. These include a range of factors such as income, employment, education and social support.
- 2.1.6. Health inequality can be defined as the difference in either health status, or the distribution of health determinants, between different population groups. Some health inequalities are unavoidable, others are not so, and may well be unjust and unfair.

### 2.2 Objective of a Health Impact Assessment

- 2.2.1. The aim of a HIA is to support and add value to the decision-making process by providing a systematic analysis of the potential impacts, as well as recommending opportunities, where appropriate, to enhance positive impacts, mitigate negative impacts and reduce health inequalities.

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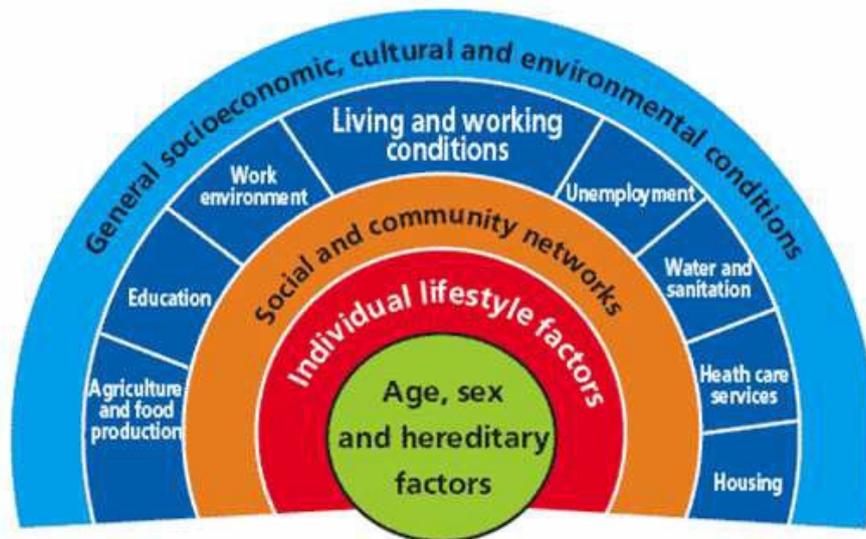
<sup>3</sup> World Health Organisation, (n/a). Definition of health assessment (HIA). Available online at: <http://www.euro.who.int/en/health-topics/environment-and-health/health-impact-assessment/definition-of-health-impact-assessment-hia>

<sup>4</sup> World Health Organisation (n/a). Constitution. Available online at: <https://www.who.int/about/who-we-are/constitution>

## 2.3 Socio-Environmental Model of Wellbeing

2.3.1. HIA’s apply the below model of health and wellbeing (**Figure 2-1**). The Socio-Environmental Model of Wellbeing considers that health and wellbeing are a result of external influences, where an individual or population experiences a combination of adverse external factors which could result in health inequality.

**Figure 2-1 - The Socio Environmental Model of Health and Wellbeing**



## 2.4 Overall aim of this HIA

2.4.1. The overall aim of this HIA will be to identify the aspects of the NLP which have the potential to affect people’s health, both directly and indirectly, in order to develop recommendations to maximise any health benefits, and minimise or remove any adverse impacts.

## 3 Scope and Methodology

---

### 3.1 Introduction

- 3.1.1. A rapid desktop HIA was undertaken in July 2023. The key tasks for this HIA were as follows:
- Develop a summary health and wellbeing baseline and profile of the LBTH area;
  - Identify relevant evidence from literature; and
  - Assess the potential health and wellbeing impacts of the NLP, and the nature and likelihood of such impacts.
- 3.1.2. The approach taken in this HIA is based on guidance produced by the Wales Health Impact Assessment Support Unit<sup>5</sup>, LBTHs own HIA guidance<sup>6</sup>, and professional judgement based on experience of undertaking similar HIAs.

### 3.2 Scope

#### Study Area

- 3.2.1. This is a rapid, desk-based assessment of the direct and indirect health effects on local communities anticipated to result from the implementation of the ten themes and 72 proposed policies of the NLP. The geographic study area of this HIA is therefore the LBTH area.

#### Study Population

- 3.2.2. The population scope of this HIA includes the LBTH resident population.
- 3.2.3. The main vulnerable groups within the population that have been considered are:
- Children and young people;
  - Older people;
  - People with disabilities and mobility impairment;
  - People with existing health conditions;
  - Unemployed and low-income groups; and
  - Socially excluded or isolated groups.

---

<sup>5</sup> Health Impact Assessment: A practical guide. Wales HIA Support Unit, accessed online: [https://phwwhocc.co.uk/whiasu/wp-content/uploads/sites/3/2021/05/HIA\\_Tool\\_Kit\\_V2\\_WEB-1.pdf](https://phwwhocc.co.uk/whiasu/wp-content/uploads/sites/3/2021/05/HIA_Tool_Kit_V2_WEB-1.pdf)

<sup>6</sup> Tower Hamlets Council - Health Impact Assessment Guidance July 2021 v2, accessed online: <https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Building-control/Application-processing/HIA-guidance.pdf>

## Determinants of Health

3.2.4. The key determinants of health and wellbeing that have been considered are:

- Air Quality,
- Noise,
- Housing and Homelessness,
- Economy and employment,
- Skills and education,
- Social cohesion and community safety,
- Access to services,
- Physical activity,
- Green Infrastructure, and
- Climate change resilience.

## Baseline Health Profile

3.2.5. The baseline and health profile of the LBTH area have been compiled using existing, publicly available data, including:

- Office for Health Improvement & Disparities (OHID) Local Authority Health Profiles;
- Office for National Statistics Labour Market Profiles (Nomis);
- Greater London Authority data;
- Tower Hamlets Annual Public Health report 2022<sup>7</sup>, and
- PHE “Local Health” datasets.

## Appraisal

3.2.6. The proposed ten key policy themes were considered and assessed against each of the identified determinants of health, looking first at the baseline conditions of the study area population, evidence of how each determinant impacts human health, the effect that the general principles and policies are likely to have on the health of the study area population, and any vulnerable groups, as presented in **Section 5**. The assessment followed the key detailed in **Table 3-1** below.

**Table 3-1 – Key to Assessment**

Effect	Symbol
Positive Health outcomes	+

<sup>7</sup> Tower Hamlets Annual Public Health Report 2022, accessed online: <https://www.towerhamlets.gov.uk/Documents/Public-Health/TowerHamletsPublicHealthReport2022.pdf>

Effect	Symbol
Negative health outcomes	-
Mixed health outcomes	+/-
Uncertain health outcomes	?
No health effects	0

3.2.7. Mitigation or recommendations are provided for each policy where this is applicable. Where the impact is deemed positive or neutral, any recommendations will outline how to ensure there is no negative impact or opportunities to further advance equality and inclusivity.

### 3.3 Assumptions and Limitations

3.3.1. Data collected by Healthwatch Tower Hamlets is not entirely representative. Although attempts were made to reach out to all borough communities by attending events, handing out leaflets, and reaching out to organisations it was found that some community groups were hesitant to take part in surveys collecting health data due to a belief that it will not result in any changes in the borough. As such, the data does not necessarily represent the experiences of this community in particular.

## 4 Community Profile and Baseline

---

### 4.1 Introduction

- 4.1.1. Amongst the communities living in, and directly affected by, any changes brought about by the key themes or policies of the NLP, the proportion and profile of vulnerable groups, identified previously in **Section 3.2**, have been outlined below using publicly available data.
- 4.1.2. Community profile data has been used to express the status of vulnerable groups with respect to their vulnerable health status and/or deprivation. In some cases, Health Profile Indicators are implicit rather than explicit, where direct Health Profile Indicators were not available.

### 4.2 Baseline

- 4.2.1. This section summarises the socio-economic and community baseline conditions for the spatial scope of the HIA. The most recent publicly available information has been used to create these profiles.

#### Population

- 4.2.2. The total population in LBTH in 2021 was 312,300. Of this total population, 157,100 (50.3%) were male and 155,200 (49.7%) were female<sup>8</sup>.
- 4.2.3. As stated by the LBTH Council Overcrowding and Under Occupation Statement 2013, overcrowding is a prominent issue in Tower Hamlets, impacting on residents' health, education, employment opportunities and well-being. As of 2020, LBTH population density was 16,237 persons per square kilometre, ranking it as the most densely populated local authority areas in the country<sup>9</sup>.
- 4.2.4. The 2021 Census data indicates that the predominant ethnicity of LBTH is Asian/British Asian (44.4%). The proportion of the population which are ethnically white is 41.6% lower than the national average<sup>10</sup>. The proportion of LBTH's population which is composed of non-white ethnic groups is higher than the national average, as outlined in **Table 4-1**.

---

<sup>8</sup> [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk)

<sup>9</sup> [borough profile \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk)

<sup>10</sup> [Tower Hamlets facts and figures - E09000030 - ONS](https://www.towerhamlets.gov.uk)

**Table 4-1 – Ethnicity of LBTH Population 2021<sup>10</sup>**

Ethnicity	Tower Hamlets(%)	England (%)
White	39.4	81.0
Mixed/multiple ethnic groups	5.0	3.0
Asian/Asian British	44.4	9.6
Black/African/Caribbean/Black British	7.3	4.2
Other Ethnic group	3.9	2.2

4.2.5. The 2021 Census data outlines the principle religious affiliations reflected in the population of LBTH, and how their proportions compare to national figures. The population of LBTH is predominantly Muslim (39.9%) with the second largest group identifying as of no religion (26.6)<sup>10</sup>. These proportions differ significantly from that of a national trend as demonstrated in **Table 4-2** below.

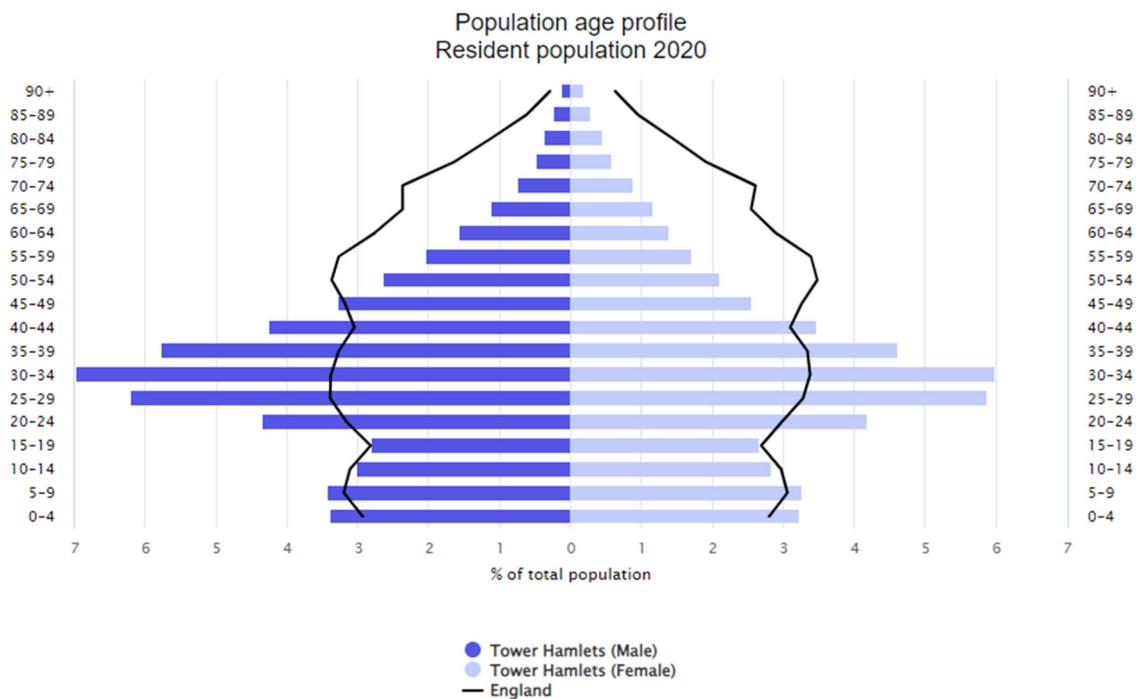
**Table 4-2 – Religion of LBTH Population 2021<sup>10</sup>**

Religion	Tower Hamlets (%)	England (%)
Christian	22.3	46.3
Buddhist	1.0	0.5
Hindu	2.0	1.8
Jewish	0.4	0.5
Muslim	39.9	6.7
Sikh	0.3	0.9
Other Religion	0.5	0.6
No Religion	26.6	36.7
Religion not stated	6.9	6.0

## Age

4.2.6. The age profile within LBTH indicates that the population is composed of predominantly Adults, with 75.9% of the population aged between 16-64. This is 5.1% higher than the London average and 11.1% higher than the national average<sup>8</sup>. Within this age group, Tower Hamlets has one of the youngest populations in the country. The largest age group in the borough is 20-39 years at 46%, a figure much higher than that of London (33%) and England (26%)<sup>9</sup>.

**Figure 4-1: Population Age Profile of LBTH 2020<sup>11</sup>**



## Life Expectancy

4.2.7. Life Expectancy is the measure of the average number of years a person would expect to live in good health based on contemporary mortality rates and prevalence of self-reported good health. The prevalence of good health is derived from responses to a survey question on general health.

<sup>11</sup> Population Age Profile [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://data.oahid.org.uk/)

- 4.2.8. Life expectancy in LBTH is largely representative of national trends. For males in LBTH, life expectancy (three year range) is 79.9 years, similar to that of the national life expectancy of 79.4 years and slightly below the London average of 80.3 years. The same pattern can be noted for females in LBTH who have a life expectancy of 83.3 years, which is on par with the national average of 83.1 years and slightly lower than the London average of 84.3 years<sup>12</sup>. The life expectancy for men in LBTH is approximately 3.4 years less than women in the borough. Gendered differences in life expectancy are representative of regional and national trends.
- 4.2.9. There is significant variation within LBTH's wards life expectancy for both males and females. **Table 4-3** details average life expectancy for specific wards in the borough.

**Table 4-3 – Life Expectancy by Ward in LBTH 2021<sup>13</sup>**

Ward	Life Expectancy (Males)	Life Expectancy (Females)
Bethnal Green	79.9	84.5
Blackwall & Cubitt Town	82.3	83.1
Bow East	78	81.3
Bow West	79.2	84.4
Bromley North	82.2	86.6
Bromley South	78.8	80.9
Canary Wharf	87.2	85.8
Island Gardens	81.7	84.6
Lansbury	77.1	81.1
Limehouse	N/A - not available	84.7
Mile End	77.4	80.5
Poplar	80.2	83.2

<sup>12</sup> Life Expectancy [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://www.phe.org.uk/data/local-authority-health-profiles)

<sup>13</sup> [Local Health - Office for Health Improvement and Disparities - Indicators: maps, data and charts](https://www.hpa.org.uk/our-work/office-for-health-improvement-and-disparities/indicators)

Ward	Life Expectancy (Males)	Life Expectancy (Females)
St Dunstan's	78.4	84.6
St Katharine's & Wapping	82.8	84.1
St Peter's	77.9	83.6
Shadwell	79.3	83.7
Spitalfields & Banglatown	81.3	N/A - not available
Stepney Green	75.4	80.1
Weavers	79.4	84.2
Whitechapel	82.3	86.2

4.2.10. The gendered variation in life expectancy within LBTH points to significant differences in health and wellbeing between wards (though some variation may be attributable to the small population that these statistics are derived from). Discounting the wards of Limehouse and Spitalfields and Banglatown due to missing data, the greatest variation in male life expectancy between wards is 11.8 years (with the lowest expectancy in Stepney Green and the highest in Canary Wharf). The greatest female variation in life expectancy between wards is lower than the male variation at 6.8 years (with the lowest expectancy in Stepney Green and the highest in Whitechapel). The largest intra-ward variation between male and female life expectancy is 6.2 years and comes from St. Dunstan's.

## Weight and Physical Activity

- 4.2.11. In 2021/22 the proportion of adults (aged 18+) in LBTH who were categorised as overweight or obese was 47.8%. This is lower than the London average of 55.9%, and much lower than the average in England which is 63.8% of the population<sup>14</sup>.
- 4.2.12. The proportion of the adult population describing themselves as physically active within LBTH is 67.6%. This is marginally higher than the proportion of the adult population describing themselves as physically active across London as a whole (66.8%), and on par with the rest of England (67.3%)<sup>15</sup>.
- 4.2.13. Obesity amongst children is measured through the National Child Measurement Programme (NCMP), which measures the weight and obesity level of both reception children (aged 4-5 years) and year 6 children (aged 10-11 years).
- 4.2.14. The prevalence of overweight children among year 6 children in LBTH was 29.7%, which is significantly higher than both the London average of 25.8% England average of 23.4%. Among reception children, the percentage of children deemed overweight was 19.9%, which was lower than the England average of 22.6%. The proportion of those deemed to be obese amongst in reception children was 10.9%, which was marginally higher than both the London average of 10.8% England average of 10.1%<sup>16</sup>.

## Lifestyle

- 4.2.15. Smoking is a major risk factor for many diseases, such as lung cancer, chronic obstructive pulmonary disease (COPD) and heart disease, as well as being linked to cancers in other organs, including lip, mouth, throat, bladder, kidney, stomach, liver and cervix.
- Smoking prevalence among adults is slightly lower than the national average with 11.7% of over 18s classed as smokers compared to 12.7% nationally. In 2021/22 4.5% of mothers smoked during pregnancy, a considerably lower rate than both the national average (9.1%)<sup>9</sup>.
- 4.2.16. The number of COPD emergency hospital admissions in LBTH in 2021 varied significantly by ward. **Table 4-4** exhibits shows the number of emergency hospital admission for the condition, with 18 out of the 20 wards having higher hospitalisation rate than the England average of 100 Standardised Admission Ratio (SAR).

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<sup>14</sup> <https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data> Adult Prevalence Obesity Profile - Data - OHID (phe.org.uk)

<sup>15</sup> [Physical Activity Physical Activity - Data - OHID \(phe.org.uk\)](#)

<sup>16</sup> [Child Prevalence Obesity Profile - Data - OHID \(phe.org.uk\)](#)

**Table 4-4 - Emergency Hospital Admissions for Chronic Obstructive Pulmonary Disease (COPD) in LBTH 2021**

Ward	LBTH COPD emergency hospital admissions SAR)
Bethnal Green	179.8
Blackwall & Cubitt Town	154.6
Bow East	201.3
Bow West	155.3
Bromley North	143.7
Bromley South	141.7
Canary Wharf	147.5
Island Gardens	121.8
Lansbury	199.5
Limehouse	171.9
Mile End	204.8
Poplar	177.1
St Dunstan's	149.5
St Katharine's & Wapping	43.3
St Peter's	311.3
Shadwell	154.7
Spitalfields & Banglatown	177
Stepney Green	138.5
Weavers	168.7
Whitechapel	97

## Unemployment/Economy

- 4.2.17. According to data collated in 2021, in LBTH a total of 190,300 people are considered to be economically active (aged 16-64 years). Of the remaining economically active population, 8,700 people or 4.6% are unemployed. Unemployment in LBTH is slightly higher than the average in London of 4.4% and England average of 3.6%<sup>8</sup>.
- 4.2.18. Of those considered economically inactive, 41.6% are classified as looking after family/home, a much higher proportion than that of London (24.6%) and England (19.8%).
- 4.2.19. LBTH has a higher-than-average proportion of workers in high value occupations when compared to the rest of England. 62.0% of the population in LBTH are employed in SOC 2010 Major Groups 1-3, including managerial and professional occupations. This is 10.4% higher than the England average of 51.6%<sup>8</sup>.
- 4.2.20. At £870, weekly median earnings for residents in LBTH are the second highest in the UK after the City of London<sup>9</sup>. Comparatively, the average weekly earnings for London is reported to be £765.4, and for all of England is less at £642.2<sup>8</sup>.
- 4.2.21. LBTH experiences great disparity in occupation type and income between residents and workers. Over half of the jobs based in Tower Hamlets are in the financial, professional, and technical sectors but just one third of resident workers are employed in these sectors. Residents are more likely to work in the distribution, hotels and restaurants sector. Additionally, in 2019 residents earned on average £90 less per week than those working in Tower Hamlets – the largest gap between workers and residents in London<sup>9</sup>.

## Education

- 4.2.22. The proportion of the population of LBTH who have gained formal qualifications is marginally lower at all NVQ levels, compared to the wider London area. Additionally, the proportion of people in LBTH who have no formal qualifications is higher than the London average. **Table 4-5** shows the percentages of the population in LBTH with qualifications compared to London and England averages.

**Table 4-5 – Qualification Level in LBTH 2021<sup>8</sup>**

Qualification	LBTH (%)	London (%)	England (%)
NVQ4 and Above	52.1	59.0	43.6
NVQ3 and Above	64.8	71.4	61.5
NVQ2 and Above	76.8	81.5	78.1
NVQ1 and Above	83.0	87.1	87.5
Other Qualifications	10.6	7.4	5.9

Qualification	LBTH (%)	London (%)	England (%)
No Qualifications	6.5	5.5	6.6

## Health

4.2.23. The proportion of residents within LBTH living with a long-term illness or health condition is 13.5%. This is 4.1% lower than the national average of 17.6%<sup>17</sup>. Prevalence of long-term illness varies greatly between wards as demonstrated below in **Table 4-6**. The lowest proportion of long-term illness comes from Canary Wharf at 8.3%, and the highest prevalence of long-term illness can be found in Stepney Green at 17.8%.

**Table 4-6 – Prevalence of Long-term Illness by Ward 2021**

Ward	Long-term Illness (%)
Bethnal Green	14
Blackwall & Cubitt Town	8.8
Bow East	14.8
Bow West	13.6
Bromley North	14.6
Bromley South	13.9
Canary Wharf	8.3
Island Gardens	9.7
Lansbury	16.9
Limehouse	9.6
Mile End	14.4
Poplar	13.7

<sup>17</sup> Long-term illness [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

Ward	Long-term Illness (%)
St Dunstan's	16.3
St Katharine's & Wapping	9
St Peter's	14.9
Shadwell	16
Spitalfields & Banglatown	13.9
Stepney Green	17.8
Weavers	15.2
Whitechapel	11.9

4.2.24. Suicide rates within areas can provide an indication of the current state of mental health of residents. The suicide rate within LBTH is 6.6 per 100,000 people. This rate is lower than the London rate of 7.2 per 100,000 and the England average of 10.4 per 100,000<sup>18</sup>.

Self-assessed health within LBTH indicates that the resident population consider themselves to be a healthy population. In LBTH in 2011, 85.1% of the population rated their health as 'very good' or 'good', with 10% stating they have 'fair' health. Additionally, 3.6% of the population stated they had 'bad' health, and 1.3% as 'very bad'<sup>10</sup>.

### Income

4.2.25. In LBTH, the proportion of children (under 16 years) in relative low-income families is significantly higher than the London average, at 26.7% and 16.4% respectively<sup>19</sup>. This proportion is also higher than the England average of 19.9%, showing LBTH to have significantly higher than average number of children living in low-income families.

4.2.26. **Table 4-7** below exhibits the average gross hourly and weekly wages of residents in full-time employment within LBTH, compared to both London and England averages. Average wages of LBTH residents in full-time employment are higher both per hour and per week compared to both the London average, as well as the rest of England.

<sup>18</sup> Suicide Rates [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

<sup>19</sup> Children living in low-income families [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

**Table 4-7 – Average Gross Weekly and Hourly Earnings of Residents in LBTH 2022<sup>8</sup>**

	LBTH (£)	London (£)	England (£)
Gross Weekly Earnings	806.9	765.4	642.2
Gross Hourly Pay	21.26	20.00	16.37

## Deprivation

- 4.2.27. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small neighbourhoods in England<sup>20</sup>. IMD is used by local governments to focus programmes in the most deprived areas and develop strategies, such as the NLPR in RBKC. IMD measures deprivation in small areas / neighbourhoods called Lower Super Output Areas (LSOAs). There 32,844 LSOAs in England.
- 4.2.28. In 2019, of the 144 LSOAs across LBTH, 44 were ranked within the 30% most deprived neighbourhoods and 35 were within the 40-50% of most deprived neighbourhoods. 14 LSOA's were within the 40-50% least deprived neighbourhoods, and 8 were within the 30-20% least deprived neighbourhoods. Only one LSOA's in LBTH was ranked in the 10% least deprived neighbourhoods<sup>21</sup>.
- 4.2.29. The most deprived LSOA's in LBTH are located in the north of the borough and consist of the wards Lansbury, St. Peter's and Stepney green.
- 4.2.30. The least deprived LSOA's in LBTH are located in the south of the borough and consist of the wards Island Gardens, Canary Wharf and St Katherine's and Wapping.

<sup>20</sup> [English Indices of Deprivation 2019: research report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>21</sup> [Indices of Deprivation 2015 and 2019 \(communities.gov.uk\)](https://communities.gov.uk)

## 5 Assessment of Policies

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### 5.1 Introduction

- 5.1.1. The policies of the NLP have been reviewed and assessed against the key determinants of health, previously outlined, to identify potential effects within the study area population.
- 5.1.2. Policies have been split into the following themes for ease of assessing, as follows:
- Delivering the Local Plan;
  - Homes for the Community;
  - Clean Green Future;
  - People, Places and Spaces;
  - Inclusive Economy and Good Growth;
  - Town Centres;
  - Community Infrastructure;
  - Biodiversity and Open Space;
  - Movement and Connectivity; and
  - Reuse, Recycling and Waste.

### 5.2 Delivering the Local Plan

#### Assessment Summary

- 5.2.1. The assessment identified the following social groups that could be affected by Delivering the Local Plan policies:
- Infants/children and young people including those leaving care;
  - Older people;
  - People with long term health conditions;
  - Women and girls;
  - Unemployed and low-income groups; and
  - Socially isolated groups including new and expectant mothers.
- 5.2.2. The Delivering the Local Plan policies set out a holistic approach to the development of the NLP, and as such, are anticipated to bring about a high degree of positive effect across numerous social groups.
- 5.2.3. Low-income and unemployed groups are positively impacted by the inclusion of developer contributions. By ensuring developers maximise contributions to the delivery of affordable housing, a greater proportion of the borough's population will be positioned to access housing.
- 5.2.4. Social value contributions under this theme are anticipated to have positive impacts. By offering skills and employment workshops as well as further education bursaries, young people will be better equipped to access higher paid jobs into the future, especially those care leavers who may have experienced disruption to their education in earlier years. Social

value contributions also include the adoption of gender inclusive design and the creation of safer spaces, which will be of particular benefit to women and girls.

- 5.2.5. Climate change mitigation is indirectly evident in the NLP's commitment to encouraging active travel and using sustainable delivery methods.

### **Delivering the Local Plan Assessment**

- 5.2.6. The summary of the assessment of the delivering the Local Plan policies on each determinant of health has been detailed below:
- 5.2.7. **Air Quality:** The Council will support developments with reduced negative impacts on air quality. Equally, all construction sites in the borough will be expected to meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice in relation to dust and air quality. Efforts to improve air quality throughout the borough will be beneficial to all social groups, particularly to older people, infants and those with long term health conditions, who are the most likely to be vulnerable to the effects of air pollution.
- 5.2.8. **Noise:** The Council will support developments with reduced negative impacts on noise and vibration. However, increased construction of multiple types of developments across the borough, as set out in the NLP, will likely contribute greatly to overall noise pollution. Increased noise has the potential to adversely affect the tranquillity of the borough.
- 5.2.9. **Housing and Homelessness:** The NLP identifies a range of sites across the borough with which to address the overall demand for housing. Within this, the provision of affordable housing is a key component of the NLP. Policy DV5: Developer contributions ensures developers maximise contributions towards the delivery of affordable housing. This will be mostly beneficial for **low-income** and **unemployed** groups.
- 5.2.10. **Economy and employment:** A key component of the NLP is its promotion of the boroughs thriving economy through continual job creation, job diversification, and employment-led development. The policies under this theme support a range of employment accommodation types in order to diversify the economy and provide small businesses with the space to thrive within the borough. The use of windfall sites will also have the potential to make a significant contribution to the supply of employment land in the borough. Potential social value contributions through Policy DV6 importantly include offering skills and employment workshops for local residents. This is particularly beneficial for **younger residents** seeking employment, especially those **leaving care** who may have experienced disruption to education in their earlier years.
- 5.2.11. **Skills and Education:** Social value contributions through this policy might include helping young people by offering higher education bursaries and skills and employment workshops for a wider group of local residents. This is particularly beneficial for younger residents seeking employment, especially those leaving care who may have experienced disruption to education in earlier years. This may also benefit low income groups who might be seeking to upskill through the provision of bursaries.

- 5.2.12. **Skills and Education:** Social value contributions through this policy might include helping young people by offering higher education bursaries and skills and employment workshops for a wider group of local residents. This is particularly beneficial for **younger residents** seeking employment, especially those **leaving care** who may have experienced disruption to education in earlier years. This may also benefit **low income groups** who might be seeking to upskill through the provision of bursaries.
- 5.2.13. **Social Cohesion and Community Safety:** The council will promote the development of community services themselves as well as community usage of town centres which act as important spaces for socialisation. Under this theme, opportunities to maximise the delivery of social value to positively contribute community benefits is also supported. This includes supporting community organisations which bring about improvements to social wellbeing. Improved social cohesion amongst the community is particularly beneficial to those who are **socially isolated**, including **new and expectant mothers**.
- 5.2.14. Use of the Tower Hamlets Code of Construction Practise is required by Policy DV4: Planning and construction of new development. Through this, the health, safety and wellbeing of the boroughs residents and businesses are protected. Social value contributions under this theme also include the adoption of gender inclusive design and creation of safer spaces, which will be of particular benefit to **women and girls**.
- 5.2.15. **Access to Services:** The policies outlined within this theme positively contribute to Access to services throughout the borough. The design of the built environment to include the provision of accessible services will directly contribute to reducing inequalities (including health inequalities) which is especially beneficial to **older people, people with disabilities, people with long term health conditions** and **low-income** groups.
- 5.2.16. **Physical Activity:** Development proposals under this theme are required to provide healthy environments, including facilitating physical activity and promote physical and mental wellbeing for all residents. Policy DV3 in particular aims to provide high-quality open spaces, culturally sensitive community facilities, and an equitable urban realm that supports walking, wheeling, and other forms of active travel. This will benefit all groups.
- 5.2.17. **Green Infrastructure:** Policy DV3 in particular aims to provide high-quality open spaces and an equitable urban realm that supports walking, wheeling, and other forms of active travel. This is likely to help to increase the provision of green infrastructure which will benefit all residents and generates significant environmental benefits throughout the borough, as well as contributes to other determinants such as climate change resilience.
- 5.2.18. **Climate change resilience:** Social value contributions under this theme include mitigating climate change through all aspects of the development, not just the built form. Climate change mitigation is indirectly evident in the NLP's commitment to encouraging active travel and using sustainable delivery methods.

**Table 5-1 – Delivering the Local Plan Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>DV1</b>	0	-	+	+	+	+	+	+	+	+	+ Children and younger people Low income groups - Children and younger people Older people	None identified
<b>DV2</b>	+/-	+/-	+	+	+	+	+	+	+	+	+ / - Older people Children and younger people People with existing health conditions Socially excluded or isolated groups.	None identified
<b>DV3</b>	0	0	+	+	+	+	+	+	+	+	+ People with existing health conditions Socially excluded or isolated groups	None identified
<b>DV4</b>	+	+	0	+	0	+	0	0	0	+	+ People with existing health conditions Socially excluded or isolated groups	None identified
<b>DV5</b>	0	0	+	0	0	+	+	0	0	0	+ Low-income and unemployed	None identified
<b>DV6</b>	0	0	+	+	+	+	+	0	0	+	+ Socially excluded or isolated groups	Social value contributions would be enhanced through specific implementation of plans to encourage communities

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Low-income and unemployed	meaningful engagement in local and regional decision-making.
<b>DV7</b>	0	0	0	+	0	0	0	0	0	+	+ Older people People with disabilities and mobility impairment People with existing health conditions	None identified
<b>DV8</b>	0	0	+	0	0	+	+	0	+	0	+ Older people Children and young people, Socially excluded or isolated groups	None identified

## 5.3 Homes for the Community

### Assessment Summary

- 5.3.1. The assessment identified the following social groups that could be affected by Homes for the Community policies:
- Families with children
  - Older people;
  - People with disabilities and mobility impairment;
  - Homeless people;
  - Students;
  - Gypsies and travellers;
  - Low-income groups; and
  - Socially isolated groups including new and expectant mothers.
- 5.3.2. The Homes for the Community policies aim to ensure the protection and enhancement of existing housing stock, the provision of a range of new housing, and an assurance of high-quality design and execution throughout the borough. This theme is anticipated to bring about a high degree of positive effects across numerous social groups.
- 5.3.3. . The requirement of development proposals to maximise the delivery of affordable homes under this theme will be especially beneficial to the health and wellbeing of low-income groups who are reliant on affordable housing. In particular, family-sized affordable housing as set out by this policy will bring about positive health benefits for families with children throughout the borough. The provision of specialist housing is beneficial to the homeless, older people and people with disabilities or mobility impairments who require supported living for their physical or mental wellbeing.
- 5.3.4. Social cohesion is highly supported by this theme. Regeneration as well as new provision is required to provide residents with a high-quality built environment, including access to community facilities. This is emphasised under specialist housing, with integration of residents into the wider community being a key focus of the policy. Greater opportunities for socialisation under this theme will improve the health and wellbeing of residents. Community safety is also a key consideration and will be considered upon the enhancement and provision of housing throughout the borough.
- 5.3.5. The appropriate locating of student accommodation in close proximity to higher education institutions increases the boroughs walkability for the student population. Shorter commuting distances will encourage the uptake of active travel, which will boost exercise levels and overall physical and mental wellbeing for this population group.

## Homes for the Community Assessment

- 5.3.6. The summary of the assessment of the Homes for the Community polices on each determinant of health has been detailed below.
- 5.3.7. **Air quality:** Additional housing in LBTH could result in a higher number of cars on the borough's roads, which could contribute to a worsening of air quality, particularly given a borough-wide Air Quality Management Area (AQMA) is already in place. Temporary worsening of air quality may occur during construction through dust and plant emissions. Negative air quality effects are likely to affect Children and young people, older people and people with disabilities or mobility impairment.
- 5.3.8. **Noise:** Policy HF7: Purpose-built student accommodation could have a negative effect on the amenity of the local neighbourhood including increased noise levels. Similarly, high-density large-scale purpose built shared living developments as proposed by this theme could have impacts on their surrounding communities in terms of noise. The policy mandates that development proposals for student accommodation and high-density large-scale purpose built shared living developments will be required to demonstrate how matters of increased noise levels have been addressed through the management of the facility.
- 5.3.9. Any adverse impacts on noise pollution as a result of policies under this theme would have negative effects on the health and wellbeing of the general population. Conversely, new housing of over 10 residential developments will be located so as to minimise exposure to noise pollution. Reduced exposure to noise pollution would have beneficial health effects for residents.
- 5.3.10. **Housing and Homelessness:** This theme identifies a range of policies targeted towards housing and homelessness in the borough. The theme is specifically geared towards regenerating and protecting existing housing stock, as well as providing a range of new housing including affordable housing, shared living buildings, purpose-built student accommodation and specialist housing to meet the rising housing demands in the borough, and ensuring high standards of living for all.
- 5.3.11. HF3 focuses on current housing, stating that development proposals resulting in the net loss of residential floorspace will not be supported. The protection and enhancement of existing residential spaces in the borough will be beneficial to the general population. Opportunities to improve housing through regeneration schemes including improving access to open space and enhancing connectivity and safety in neighbourhoods will improve the overall health and wellbeing of current and future populations in the borough.
- 5.3.12. The theme also sets out to meet the growing demand for housing through new provision. Within this, a range of accommodation types are supported. HF4 focuses on development proposals for new specialist and supported housing. This will be particularly beneficial for **older people** and **people with disabilities** or **mobility impairment** who often require supported living. The specialist care needs of the homeless are also considered here

through the provision of **homeless** shelters and transitional housing for those experiencing homelessness.

- 5.3.13. HF2 targets affordable housing, stating that development proposals will be required to maximise the delivery of affordable homes. This policy will have positive impacts for low-income groups in the borough whose health and wellbeing are likely dependent on affordable housing. A sub-policy presented here is the requirement for family-sized affordable housing, which will also be beneficial **for families with children**. In particular, family sized housing for **low-income families** is a pressing requirement throughout the borough, and one which is a key consideration of this policy. Similar to this is the provision of Houses of Multiple Occupancy (HMO); HMOs typically are lower cost as residents make use of shared facilities and so are eligible for a shared room rate benefit. This will also bring positive health impacts to **low-income groups**.
- 5.3.14. Appropriate location of new student accommodation is considered here too, with policies ensuring walkability for **students** to their institution which will be beneficial to the student populations overall physical wellbeing. There is potential for disruption to existing residents through noise pollution as a result of new purpose built student accommodation. **Gypsies and Travellers** are also considered under this theme through safeguarding of the existing gypsy and traveller site at Old Willow Close.
- 5.3.15. Finally, the theme outlines requirements for housing standards and quality. By ensuring a certain degree of quality (including minimised exposure to noise and air pollution, exposure to sunlight and adequate amenity space) the policy supports the overall health and wellbeing of the population.
- 5.3.16. **Economy and employment:** The policies outlined within Homes for the Community are unlikely to directly impact upon Economy and employment within LBTH. The delivery of a significant amount of student housing under this theme may compromise the Council's ability to deliver other priorities, including employment space provision. Despite this the delivery of student accommodation will be done so recognising the positive impacts it brings to the communities and the borough's local economy.
- 5.3.17. **Skills and education:** The policies outlined within Homes for the Community are unlikely to directly impact upon Skills and education within LBTH. By supporting the educational attainments of students from the borough and providing affordable student housing accommodation, a greater proportion of residents will be able to gain skills in order to access better jobs into the future, earning a higher income and gaining an improved standard of living which will in turn generate positive effects for health and wellbeing.
- 5.3.18. **Social cohesion and community safety:** Under this theme, a sense of community belonging, and social interaction is promoted through the enhancement of existing housing and provision of new housing. Development proposals for affordable housing are required to provide residents with a high-quality built environment, including the provision of community facilities.

- 5.3.19. A sub-policy of HF4 on specialist housing is the integration of residents into the surrounding community. Specific focus on the opportunities for socialisation by groups in needs of specialist housing like the homeless, older people, people with disabilities and mobility impairments will make significant improvements to their quality of living and general wellbeing. The policy aims to incorporate where practical, small-scale community and town centre uses within the development proposal for specialist housing. Such components can improve the health and well-being of residents as they offer opportunity to play an active role in their community through continued interaction with the surrounding community.
- 5.3.20. Community safety is also a key consideration of this theme. In line with the housing standards and quality set out under this theme all new provision of housing will be built to ensure safety and surveillance.
- 5.3.21. **Access to services:** The policies outlined within this theme positively contribute to access to services throughout the borough. Policies ensure that residents in affordable housing, specialist housing and purpose-built student accommodation will experience the same degree of accessibility to local services as existing housing in the borough. Increased population in the borough through the provision of new housing under this theme may put pressure on existing services. The increased demand on services may have an adverse effect on the health and wellbeing of the population.
- 5.3.22. **Physical activity:** By considering appropriate locations for student accommodation within the borough the policy aims to improve walkability for students. Residing only a short walking distance from a further or higher education institution will likely encourage the uptake of active travel. Higher levels of physical exercise will boost the overall physical and mental wellbeing of this population. Relating to specialised housing, the policy states that where mobility is limited, development proposals should be located within 5 minutes walking distance of amenities including local shops, services and community facilities so that residents can continue to engage in physical exercise within their local community. Walkability here will again bring about improvements to the overall physical and mental wellbeing of residents.
- 5.3.23. **Green Infrastructure:** The policies outlined within Homes for the Community are unlikely to directly impact upon Green Infrastructure within LBTH.
- 5.3.24. **Climate change resilience:** Policy HF9 recognises the need for homes to be able to adapt to climate change without the need for mechanical cooling. This will be particularly beneficial to low-income groups who are likely to be positioned as unable to afford the necessary energy costs for this type of in-home cooling.

**Table 5-2 – Homes for the Community Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>HF1</b>	-	-	+	0	0	0	0	0	0	0	+ Low income groups Younger people Older people People with disabilities and mobility impairment  People with existing health conditions Socially excluded or isolated groups (Gypsies and travellers) - Children and younger people Older people People with existing health conditions	Increased demand on services throughout the borough as a result of the growing population will require the strengthening of services. This should take the form of provision of new facilities as well as the employment of additional staff.
<b>HF2</b>	0	0	+	0	0	0	0	0	0	0	+ Low income groups	None identified.
<b>HF3</b>	0	0	+	0	0	0	0	0	0	0	No specific groups have been identified.	None identified
<b>HF4</b>	0	0	+	0	0	+	+	0	0	0	+ Older people People with disabilities and mobility impairment	None identified
<b>HF5</b>	0	0	+	0	0	0	0	0	0	0	+ Socially excluded or isolated groups (Gypsies and travellers)	Appropriate sites may need to be identified within or outside the borough as avoid illegal sittings. If new sites outside the borough are required, the council may

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
												need to work with adjoining boroughs to deliver them. LBTH are currently awaiting the outcomes of the Greater London Authorities Gypsy and Traveller Accommodation Needs Assessment
HF6	0	0	+	0	+	+	+	0	0	0	+ Younger people (students) Low-income groups (students) Socially excluded or isolated groups (care leavers)	All purpose-built student accommodation should have a noise nuisance curfew in place between 11pm and 7am. This should be communicated to all new residents upon the start of their tenure as well as potential penalties they could face in instances of breaking the curfew.
HF7	0	0	+	0	0	+	+	0	0	0	+ Low-income groups People with disabilities and mobility impairment	None identified.
HF8	0	0	+	0	0	+	0	0	0	0	+ Low-income groups	None identified
HF9	0	0	+	0	0	+	0	0	0	+	+ Children and younger people People with disabilities and mobility impairment Low-income groups	None identified

## 5.4 Clean and Green Future

### Assessment Summary

- 5.4.1. The assessment identified the following social groups that could be affected by Clean and Green Future policies:
- Infants/children and young people including care leavers;
  - Older people;
  - People with long term health conditions; and
  - Low-income groups.
- 5.4.2. In general, Clean and Green Future results in positive impacts upon health determinants. There are a number of resulting beneficial health effects, particularly upon older people, infants, children and young people including care leavers, people with long term health conditions and low-income groups.
- 5.4.3. Clean and Green Future policies provide positive impacts upon air quality within the borough, benefitting all residents. The improvement of air quality can have particularly beneficial effects for older people, infants, and those with long term health conditions. The reduction in emissions to air including construction related emissions, such as PM<sub>10</sub> and PM<sub>2.5</sub>, as well as the new provision of energy efficient buildings will improve physical health and wellbeing throughout the borough. Similarly, reductions in noise brought about by the proposed policies will contribute positively to the wellbeing of borough residents.
- 5.4.4. This theme of policies also aims to mitigate the risk of flooding and overheating as part of the wider improvements to the boroughs overall climate change resilience. Improved flooding resilience will ensure the preservation of housing and developments in the borough for those living in high-risk flooding areas. These impacts will also positively affect those living in flood zones. Additionally, avoidance of overheating in building design will be beneficial to the health and wellbeing of residents and building users in the borough, as well as positively contribute to the future housing stock of the borough.

### Clean Green Future Assessment

- 5.4.5. The summary of the assessment of the Clean Green Future policies on each determinant of health has been detailed below.
- 5.4.6. **Air Quality:** The association between health effects and exposure to air pollutants is now well established, with distinct health risks associated with exposure to particulates available at a local level. Older people, infants, and those with long term health conditions, are the most likely to be vulnerable to the effects of air pollution.
- 5.4.7. Policy CG6 specifically addresses Air Quality within LBTH, outlining measures for the mitigation and improvement of poor air quality in the borough. Specifically, the policy supports the implementation of an air quality positive approach in line with the Air Quality Positive LPG (2023) for all major developments. All other development proposals are required by the policy to meet or exceed the 'air quality neutral' standard. This also includes

the promotion of low or zero emission transport usage and reducing the reliance on private motor vehicles. Where an air quality assessment indicates potential adverse impacts on air quality, development will be resisted unless mitigation measures are put forward.

- 5.4.8. A number of policies within the Clean and Green Future package also contribute to maintaining, and improving, air quality throughout LBTH. CG2, CG3, and CG4 focus on the provision of energy efficient buildings. Residents' health will be improved as a result of these policies due to a reduced exposure to air pollutants. The anticipated beneficial effects of these policies are most likely to be felt in areas of low-income, in population groups with long term health conditions, older populations, and younger populations, particularly in wards in the north of the borough. Improvements to the public realm through reductions in air pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.
- 5.4.9. The development and introduction of these policies is likely to improve the air quality within the borough and minimise the negative effects upon those in the most vulnerable social groups.
- 5.4.10. **Noise:** The NLP will aid in reducing noise and vibration. Policy CG10: Noise and Vibration, outlines the criteria for new developments and noise as well as efforts to manage existing noise sources. This policy will result in the reduction of noise and vibration attributed to new and existing developments throughout the borough, reducing the levels of nuisance felt to those living in close proximity to developments and existing noise sources, as well as positively contributing to the tranquillity of the borough.
- 5.4.11. **Housing and Homelessness:** The Policies outlined within Clean and Green Future are unlikely to directly impact upon homelessness within the borough. Potential beneficial impacts to housing will result from the improvement of the boroughs housing stock through policies CG2, CG3 and CG4. Their focus on the provision of energy efficient buildings and associated energy savings for current and future residents will work to reduce costs and support better quality housing stock for the borough's population.
- 5.4.12. **Economy and employment:** Policies proposed within the NLP's Clean and Green Future will contribute to a circular economy within the borough, with new developments aligned with circular economy principles. In particular, CG4: Embodied carbon, retrofit and circular economy requires major development proposals to assess whole lifecycle carbon emissions using the methodology set out in the London Plan (2021) and Whole Lifecycle Carbon Assessment LPG (2022). This will help to protect the borough for the future through limiting waste, air pollution, and emissions.
- 5.4.13. With a higher rate of unemployment than the region and England, design requirements as part of the Clean and Green Future policies could indirectly result in job opportunities in the borough, particularly within the construction and renewable energy sectors. Jobs in construction are especially accessible to young people with low skill and education levels, including care leavers who may have experienced disruption to their education in earlier years.

- 5.4.14. Skills and education The policies outlined within Clean and Green Future are unlikely to directly impact upon skills and education within LBTH.
- 5.4.15. **Social cohesion and community safety:** The policies outlined within Clean and Green Future are unlikely to directly impact upon social cohesion and community safety within LBTH.
- 5.4.16. **Access to services:** The policies outlined within Clean and Green Future are unlikely to directly impact upon access to services within LBTH.
- 5.4.17. **Physical activity:** The rate of obesity within adults in LBTH is lower than both London and England averages. The proposed policies are not anticipated to have a direct impact on physical activity in the borough. There are potential positive cumulative improvements to biodiversity, in conjunction with biodiversity and open space policies. Improved biodiversity and open space will likely encourage borough physical activity outdoors to an improvement public realm and green spaces.
- 5.4.18. Green Infrastructure Clean and Green Future will likely involve the use of green infrastructure methods which will preserve and improve infrastructure for the borough, bringing about positive impacts. Specifically, the first item in the London Plan cooling hierarchy that is to be implemented throughout the borough is the provision of green infrastructure. Doing so generates significant environmental benefits, as well as contributes to other determinants such as climate change resilience.
- 5.4.19. **Climate change resilience:** There are numerous impacts of climate change, both acute and chronic, that may be felt within LBTH. Most notably, the London-wide vulnerability mapping (2020) indicates that Tower Hamlets is at an increased risk of overheating as a direct result of climate change. Overheating can cause significant discomfort to residents and building users and is particularly detrimental to Older people.
- 5.4.20. Policy CG5 is targeted towards overheating, ensuring that development proposals are designed with a view to avoid overheating and excessive heat generation, whilst also minimising the need for internal mechanical cooling systems. However, this only accounts for new developments, leaving those in existing properties vulnerable to climate change events.
- 5.4.21. Multiple Clean and Green Future proposed policies also address plans to limit and reduce the carbon emissions of the borough, aiming to limit further damage to the climate as a result of developments within the area. This will not only improve climate resilience but also contribute towards improved air quality which is beneficial for the overall health of residents throughout the borough.

**Table 5-3 – Clean and Green Future Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>CG1</b>	+	0	0	+	0	0	0	0	+	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
<b>CG2</b>	+	0	+	0	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
<b>CG3</b>	+	0	+	0	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified.
<b>CG4</b>	+	0	+	+	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions +/- Low income groups	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.  Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
<b>CG5</b>	+	+	+	0	0	0	0	0	0	+	+Older people	None identified

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Children and young people People with existing health conditions Low income groups	
<b>CG6</b>	0	0	0	0	0	0	0	0	0	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
<b>CG7</b>	0	0	0	0	0	0	0	0	+	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
<b>CG8</b>	0	0	0	0	0	0	0	0	0	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
<b>CG9</b>	+	+	0	0	0	0	0	+	+	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
<b>CG10</b>	0	+	0	0	0	0	0	0	0	0	+ Older people Children and young people People with existing health conditions Low income groups	None identified
<b>G11</b>	0	0	0	0	0	0	0	0	0	0	No specific groups have been identified.	None identified

## 5.5 People, Places and Spaces

### Assessment Summary

- 5.5.1. The assessment identified the following social groups that could be affected by the People, Places and Space theme policies:
- Infants/children and young people;
  - Older people;
  - People with long term health conditions;
  - Women and girls;
  - Unemployed and low-income groups; and
  - Mothers and caregivers.
- 5.5.2. The policies proposed within the People, Places and Spaces theme have the potential to result in positive health effects upon multiple social groups, primarily through improving the quality of housing provision within LBTH. Improved quality of housing as well as associated access to open space will contribute positively to the physical health and wellbeing of the LBTH population. Additionally, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.
- 5.5.3. The theme also aims to improve the provision of appropriate facilities for residents and the wider community. Improved access to services will improve the health and wellbeing of older residents and contribute towards reducing loneliness.
- 5.5.4. This theme has a strong focus on generating adequate housing provision for the borough, with specific reference to housing affordability, including in the form of tall buildings. This policy could result in positive impacts upon housing and homelessness in LBTH, improving the availability of community housing for those on low-incomes, or who are homeless.
- 5.5.5. The affordability of community housing within LBTH may not be truly affordable for those who are currently homeless or on very low-incomes, and therefore some beneficial effects may be limited in their distribution.

### People, Places and Spaces Assessment

- 5.5.6. The assessment of the People, Places and Spaces policies against each of the key determinants of health have been outline below.
- 5.5.7. **Air Quality:** The association between health effects and exposure to air pollutants is now well established, with distinct health risks associated with exposure to particulates at a local level<sup>22</sup>. Older people, infants, and those with long term health conditions are the most likely to be vulnerable to the effects of air pollution.
- 5.5.8. Urban greening as encouraged by policy PS2: Tall Buildings, will help to support air purification and dust suppression which could help to reduce the levels of air pollution within the borough. Additionally, the retrofitting of heritage assets as outlined in PS6: Heritage and

the Historic Environment, to achieve greater energy efficiency will do so in line with the Council's policies on improved air quality. Improvements to the public realm through reductions in air pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.

- 5.5.9. The significant scale of construction activities occurring simultaneously as a result of the development proposed under this theme will likely generate short-term noise and air pollution. Dust and emissions created from construction will be damaging to the health of vulnerable residents including older people, infants and those with long term health conditions.
- 5.5.10. **Noise:** The policies support of new and higher standard housing will result in increased levels of residential occupation and the associated increase in ambient noise levels. Additionally, construction related noise from new housing developments may negatively impact upon the tranquillity and consequent physical and mental health of residents in the borough. Policy PS3: Securing Design Quality, aims to offset these likely impacts by ensuring developments do not result in unacceptably harmful impacts arising from noise pollution and their subsequent harmful effects on human health.
- 5.5.11. **Housing and Homelessness:** This theme of policies has a strong focus on the provision of housing within the borough. Policy PS2: Tall Buildings, aims to positively contribute to meeting the borough's high housing targets in a way that meets the needs of those requiring affordable housing.
- 5.5.12. Policy PS3 (Securing Design Quality), mandates that the highest standard of design is met by all new developments, ensuring the quality of new housing as well as the quantity assured by PS3. However, improvements made to housing quality will apply to new residential developments only. This means that existing homes, particularly community housing, will not necessarily see improvements of the same scale, limiting the distribution of beneficial effects. This will adversely impact low-income groups who live in community housing and cannot afford to make improvements to their home independently.
- 5.5.13. The policy does not specifically target homelessness, although there is a likely positive effect on homelessness as a result on increased provision of affordable housing.
- 5.5.14. **Economy and employment:** Policy PS9: Shopfronts, outlines the need for active shopfronts which will help to improve the economic diversity within the borough, supporting the strength of the local economy. The policies outlined within this theme are unlikely to directly impact upon employment within LBTH.
- 5.5.15. **Skills and education:** The policies outlined within this theme are unlikely to directly impact upon Skills and Education levels within LBTH.
- 5.5.16. **Social cohesion and community safety:** According to the IMD for crime , of LBTH's 144 LSOA's, 44 are within the 30% most deprived. These LSOA's are located predominantly in the north of the borough. Improvements to the public realm including housing within LBTH, as proposed under this theme, are likely to improve social cohesion and community safety

in the borough for all residents. The provision and enhancement of community facilities such as community hubs will provide spaces for members of the community to come together and socialise, including cross-cultural engagement. The policy also states that facilities such as open space should be designed in collaboration with the local community in order to meet their needs for sociability. Gender inclusive design in line with this theme will also aid in encouraging women and girls to engage with socialisation spaces as a result of their improved feelings of safety within them.

- 5.5.17. PS4: Attractive Streets, Spaces and Public Realm, encourages new developments to embed principles of 'Secured by Design'. The policy mandates developers should refer to crime prevention and security guidance to ensure all risk is mitigated. Policy PS5: Gender Inclusive Design, will work to ensure mothers and caregivers have access to facilities to be able to meet and socialise outdoors in a safe and social setting.
- 5.5.18. Gender is also considered in relation to the safety of women at night, ensuring routes are well-signed and appropriately lit to foster feelings of safety in the space. The improvement of women's safety will work to relieve feelings of stress and unease for women when moving through spaces, positively contributing to the mental wellbeing of female residents in the borough.
- 5.5.19. **Access to services:** PS4: Attractive Streets, Spaces and Public Realm aims to improve the provision and accessibility of appropriate facilities for residents and the wider community. Improved access to services such as healthcare services will improve the overall physical and mental health of older people, as well as contributing to reductions in loneliness experienced by older residents in the borough. Improvements to services and access to them is particularly important to the Bangladeshi community within the borough, whose responses within the Healthwatch Tower Hamlets Survey showed that this group sought a prioritisation of improved services and activities for young people, access to a place of worship, access to healthy eating programmes and public transport facilities like bus stations .
- 5.5.20. **Physical activity:** The development of new housing, especially tall buildings, within the NLP is required to provide high quality private communal open space. Access to open space will encourage and enable improvements in physical activity levels within the borough, leading to a potential reduction in incidents of obesity and the proportion of residents who are overweight. These positive effects could potentially impact across all demographic groups.
- 5.5.21. **Green Infrastructure:** Numerous proposed policies in this theme will positively contribute to green infrastructure in the borough, predominantly through the provision of open space and urban greening in association with new housing. Improvements to the public realm through additional green spaces can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.

- 5.5.22. **Climate change resilience:** During the construction of new housing developments, emissions from vehicles and construction plant may be higher and therefore adversely affect the climate.
- 5.5.23. The resilience of new housing developments to climate change factors such as heat and flooding will have beneficial contributions to the boroughs climate resilience. This is due to the policies of building requirements to reduce overheating in the borough as well as the requirement to put forward flood risk mitigation upon development. Improvements made to housing through prevention of overheating and implementation of cooling systems will be particularly beneficial to older people and people with long term health conditions.
- 5.5.24. Additionally, the retrofitting of heritage assets as outlined in PS6, Heritage and the Historic Environment, to achieve greater energy efficiency will do so in line with the council's policies on climate change, positively contributing to climate change resilience in the borough.

**Table 5-4 – People, Places and Spaces Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>PS1</b>	+/-	+/-	+	0	0	+/-	0	0	+	0	- Socially excluded or isolated groups + Children and young people Older people Socially excluded or isolated groups	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
<b>PS2</b>	+/-	-	+	0	0	+/-		0	0	0	- Socially excluded or isolated groups  People with disabilities and mobility impairment	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.  Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
<b>PS3</b>	+/-	+/-	+	0	0	0	+	+	+	+	+ Children and young people  Older people People with existing health conditions  - Low-income groups	Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.
<b>PS4</b>	+	0	0	0	0	+	+	+	+	+	No specific groups identified	Street features and public realm that are frequented by vulnerable groups such as children and low-income groups should consider avoiding locating nearby

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
												advertisement content including hot food takeaway and betting.
PS5	0	0	0	0	0	+	+	+	0	0	+ Socially excluded or isolated groups (Women and girls, LGBTQ+ community and ethnic minority groups) Older people Children and young people	The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.
PS6	0	0	+	0	0	+	0	0	0	0	+ Older people People with disabilities and mobility impairment	None identified
PS7	0	0	0	0	0	+	0	0	+	0	+ Older people People with disabilities and mobility impairment	None identified
PS8	0	0	0	0	0	+	0	0	0	0	No specific groups identified.	None identified
PS9	0	0	0	+	0	+	0	0	0	0	+ Older people People with disabilities and mobility impairment	Shopfronts can act as key sites of sensory overload for the neurodivergent population of the borough. Enhancement of appearance to shopfronts should consider potential adverse effects on neurodivergent people.
PS10	0	0	0	+	0	+	0	0	0	0	+/- Older people	Advertisement content including hot food takeaway and betting should consider placement away from areas where

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											People with disabilities and mobility impairment  Children and young people (School age)	vulnerable groups such as children and low-income groups may frequent.  Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered.
<b>PS11</b>	0	0	0	0	0	0	0	0	0	0	No specific groups identified.	None identified

## 5.6 Inclusive Economy and Good Growth

### Assessment Summary

- 5.6.1. The assessment identified the following social groups that could be affected by the Employment and Economic Growth theme policies:
- Young people including care leavers;
  - Elderly;
  - Mothers and caregivers; and
  - Unemployed and low-income groups.
- 5.6.2. This theme of policies focuses on the support and enhancement of economic growth across the borough. This is predominantly put forward through the protection of existing employment spaces, and creation of new spaces, including affordable ones.
- 5.6.3. The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's employment spaces. The designation of Strategic Industrial Locations will protect existing spaces of economic activity and allow the borough to maintain its position as a global economic hub. Equally, any development that will result in the direct loss of employment floorspace within these strategic industrial locations will not be supported under this theme. New employment spaces are also covered by this theme, with affordability of commercial space being a key requirement to this. Affordability is anticipated to allow the emergence of a wider range of economic sectors in the borough.
- 5.6.4. The policy also supports the provision of education and upskilling opportunities throughout the borough. In doing so the current skills gap amongst the working population will likely diminish and a wider range of jobs will be accessible to a greater proportion of the population.
- 5.6.5. New developments are not yet required to respond to the future climate needs of the borough. Flooding and overheating are not considerations of new employment space development and so the risk of such events is not mitigated through this theme.

### Inclusive Economy and Good Growth Assessment

- 5.6.6. The assessment of the Inclusive Economy and Good Growth policies against each of the key determinants of health have been outline below.
- 5.6.7. **Air Quality:** The policies included within the Economy and Town Centres theme are unlikely to have a direct impact on air quality within LBTH. The intensification of industrial uses in the borough could lead to more HGV trips on local roads, leading to increased air pollution. This would bring adverse effects to the overall health and wellbeing of all borough residents.
- 5.6.8. **Noise:** Policy EG2: New Employment Spaces, seeks to ensure that new employment development does not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.

- 5.6.9. **Housing and Homelessness:** Policy EG1: Creating Investment and Jobs aims to support mixed-use development which could include residential development. This will help to increase the provision of housing in the borough however, this policy does not mention the affordability of these homes or the quantity to be made available. Through the safeguarding of land for employment uses, residential development will be hindered in areas of the borough due to this policy.
- 5.6.10. **Economy and employment:** Policy EG1: Creating Investment and Jobs, supports development proposals which provide employment opportunities. The policy also mandates that a range of job opportunities at all levels will be accessible across the borough. A range of job opportunities is particularly beneficial to young people with low skill and education levels, including care leavers who may have experienced disruption to education in their earlier years.
- 5.6.11. Employment spaces are also considered under this theme, with existing designated employment locations being protected and the provision of additional employment floorspace encouraged, including the provision of affordable commercial space. Developments that will result in the direct loss of employment floorspace within strategic industrial locations will not be supported by the council under this theme.
- 5.6.12. All policies under this theme are aimed towards supporting and promoting successful and sustainable economies in Tower Hamlets, as well as protecting the borough’s global, national and local economic role in delivering jobs and supporting businesses. The protection of existing strategic industrial locations will support the long term position of the borough as a global economic hub. Additionally, by supporting and promoting a range of new employment spaces including affordable ones, the policy also supports new and emerging economic sectors.
- 5.6.13. **Skills and education:** Policy EG1: Creating Investment and Jobs aims to support the generation of employment opportunities by closing the current skills gap amongst the working population through improving access to education and training. Additionally, the requirement for affordable commercial space under this theme is intended to support educational outcomes through connections to schools, colleges and higher education. This policy’s intended provision of upskilling and education opportunities is particularly beneficial to young people with low skill and education levels, including care leavers who may have experienced disruption to education in earlier years.
- 5.6.14. **Social cohesion and community safety:** The railway arches in Tower Hamlets are a key component of the culture and community of the borough. Policy EG5: Railway Arches, seeks to retain those railway arches in uses that make a positive contribution to the community. Specifically, the policy supports development proposals involving railway arches where the principle use is for the community. Policy EG6: Data centres aims to ensure sufficient broadband capacity to serve all residents. Where broadband has previously been insufficient, this policy will bring about alternative forms of social cohesion as digital connectivity will be enhanced throughout the borough. This could be especially beneficial to

the mental wellbeing of elderly people who might suffer from social isolation and loneliness though such a benefit is reliant on a degree of digital literacy amongst this population group.

- 5.6.15. **Access to services:** Those who commute to work via cycling are supported by policy EG3: Affordable workspace through its provision of end-of-trip facilities in workplaces. This may be particularly beneficial to low-income groups who may find cycling to work to be an economically efficient and therefore preferable method of transport.
- 5.6.16. New employment spaces should provide a range of shared services and appropriate facilities such as communal breakout spaces, kitchen areas, showers and childcare facilities. This policy will be beneficial to a range of groups. Low-income groups who might cycle to work for economic efficiency will benefit from shower facilities, as well as kitchen spaces that will allow them to bring food prepared at home rather than purchase food at work to keep costs down. Equally, mothers and caregivers will benefit from the provision of childcare facilities.
- 5.6.17. **Physical activity:** The policies outlined within this theme are unlikely to directly impact upon physical activity levels within LBTH. Provision of shower facilities in new workspaces under this theme may encourage active transport to work, including cycling, or participation in exercise during breaks (e.g. going for a run at lunchtime) which would improve the overall physical health of those workers engaging in these activities.
- 5.6.18. **Green Infrastructure:** The policies outlined within this theme are unlikely to directly impact upon green infrastructure within LBTH.
- 5.6.19. **Climate change resilience:** The construction and operation of new employment spaces will adversely impact climate in the borough, contributing to overall GHG emissions. Additionally, there is no reference to climate change factors like flooding and overheating in relation to the development of new employment spaces under this theme, and so resilience of such spaces to climate change will be minimal. This could have an adverse impact on residents and workers in the borough.

**Table 5-5 – Inclusive Economy and Good Growth Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>EG1</b>	0	-	+	+	+	0	+	0	0	-	+ Low-income groups Younger people - Older people Children and young people People with disabilities and mobility impairment	None identified.
<b>EG2</b>	+/-	+/-	0	+	0	0	+	0	0	-	+ Low-income groups People with disabilities and mobility impairment - Older people Children and young people People with disabilities and mobility impairment	New employment spaces should be a diverse mix of office space and spaces for small businesses to thrive. Economic prosperity and good health outcomes are inextricably linked. Providing a range of business types can provide employment opportunities to a wider range of population groups whose health would benefit from being employed.
<b>EG3</b>	0	0	0	+	+	0	+	0	0	0	+ Low income groups	None identified
<b>EG4</b>	0	0	0	+	0	0	+	0	0	0	+ Low income groups	None identified
<b>EG5</b>	0	0	0	+	0	+	+	+	0	0	No specific groups have been identified.	None identified.
<b>EG6</b>	0	0	0	+	0	0	0	0	0	0	No specific groups have been identified.	None identified

## 5.7 Town Centres

### Assessment Summary

- 5.7.1. The assessment identified the following social groups that could be affected by Town Centres policies:
- Young people including care leavers;
  - Older people;
  - People with disabilities;
  - Women and girls;
  - New and expectant mothers
  - Unemployed and low-income groups; and
  - Socially excluded or isolated groups.
- 5.7.2. The policies outlined within the Town Centres theme are likely to have mixed impacts upon the selected health determinants. These impacts are likely to be predominantly positive, with positive effects expected for young people including care leavers, older people, new and expectant mothers, women and girls, people with disabilities, low-income and unemployed groups and socially isolated groups.
- 5.7.3. The Town Centres theme supports social cohesion across the borough, with existing routes being prioritised and new venues being developed to encourage opportunities for social interaction between community members. Community safety could be compromised by the planned increase of night-time leisure and entertainment venues due to their potential to cause anti-social behaviour. This is particularly likely to impact young people who could be the main users of these venues. Mitigation measures are to be put in place via a management plan to avoid negative impacts of this on the surrounding community.
- 5.7.4. Access to services is highlighted by this theme, and the provision of community services is demonstrated to be the primary function of district centres and neighbourhood centres in the borough. Services are also being made more widely available to those workers in the night-time economy, who cannot access them during normal business hours, through the requirements for late-opening and 24-hour services.
- 5.7.5. Development in town centres are anticipated to have significant positive economic effects. The policies under this theme encourage and support existing and new business ventures in the borough, resulting in additional employment opportunities throughout. In particular, the planned increase of night-time leisure and entertainment venues in the borough will provide employment opportunities, as well as boost the local economy. The increase in employment opportunities as a result of this policy could have a positive impact on currently unemployed and low-income residents in the borough.

## Town Centres Assessment

The assessment for Town Centre policies against each of the determinants of health has been set out below.

- 5.7.6. **Air Quality:** Policy TC2: Protecting the diversity, vitality, and viability of our town centres, seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
- 5.7.7. **Noise:** Numerous policies under this theme contribute positively to the noise environment throughout the borough. Policy TC2: Protecting the diversity, vitality and viability of our town centres, seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.
- 5.7.8. Food and drink venues under this policy will be required to demonstrate that the use of outdoor spaces will not have a significant impact on neighbourhood residential occupiers in terms of noise. Proposals for evening and nighttime leisure uses will also be expected to submit a management plan including methods to mitigate amenity impacts such as noise.
- 5.7.9. Improvements to the public realm through reductions in noise pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.
- 5.7.10. **Housing and Homelessness:** The provision of short-stay accommodation under this theme will not compromise the supply of C3 self-contained homes and would not undermine the borough's ability to deliver against strategic housing targets. This will enable the continuation of affordable housing rollout, which will be beneficial for low-income groups who are the key recipients of such housing schemes and targets. Policy TC1 also promotes 'multi-purpose' town centres which include residential uses, which will support the provision of varied housing options available to local residents.
- 5.7.11. **Economy and employment:** Developments to town centres are anticipated to have positive economic effects. This theme's support of town centres directly continues the support of their role as key global employment centres. The protection and enhancement of existing employment spaces will positively contribute to the localised economies present in the borough.
- 5.7.12. Developments to town centres will encourage business investment in LBTH and improve the economy of the borough. Both larger businesses and independent, artisanal sector businesses will be encouraged to set up in developed, diverse town centres in LBTH. A diverse range of employment opportunities, including lower skilled work will be beneficial for those groups who are currently unemployed or those whose low skill and/or education levels, like young people (including care leavers), currently prohibit their entry into the borough's more predominant higher paid job markets. These employment opportunities may be high-quality, facilitating training for the low skilled to gain access to higher paid roles.

- 5.7.13. Additional town centre developments could contribute to the availability of additional employment opportunities within the borough, especially to otherwise marginalised groups. This theme can have a positive impact on those groups as a result of the nature of businesses in town centres, their physical proximity to residents, and the sense of community that they provide.
- 5.7.14. The improvement of town centres, and increase in employment opportunities could, potentially, have a positive impact on currently unemployed and low-income residents in the borough. Policy TC7: Evening and Night-time Economy specifically aims to boost the local economy by supporting food, drink and leisure uses in the evening and at night.
- 5.7.15. **Skills and education:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Skills and Education levels within LBTH, however, employment opportunities have the potential to boost skills and education through training, when provided by the employer.
- 5.7.16. **Social cohesion and community safety:** The diversification and investment in improving Town Centres in LBTH could improve social cohesion in the borough. Under this theme key pedestrian routes and street level activity will be prioritised in order to encourage opportunities for social interaction in the borough's town centres. The particular focus on food and drink provision in TC5 is especially significant for social cohesion as cafes and pubs provide ideal spaces for local residents, workers and students to meet and socialise. Enhancing these spaces will improve the levels of social cohesion possible in the borough.
- 5.7.17. There is potential for the increasing numbers of evening and night-time leisure and entertainment venues to give way to anti-social behaviour in the borough. Such instances would have negative impact on social cohesion and safety community wide. The policy aims to mitigate this through the adoption of a management plan. Gender inclusive safety (predominantly in night-time venues that involve the consumption of alcohol) is improved under this theme through the implementation of National Pubwatch and the 'Ask for Angela' scheme. Women and girls will benefit from this addition especially. Improved feelings of safety will enable women to engage more fully in social activities at night, alleviating feelings of stress and unease and promoting good mental health.
- 5.7.18. **Access to services:** Under this theme the network of centres across the borough is defined in relation to their function and how they serve the wider area. District centres and neighbourhood centre's primary role is the provision of community services to meet local needs. Easily accessible services are of a great beneficial impact to many social groups in the borough. In particular, health care services are of great importance to older people, new and expectant mothers, and those with disabilities.
- 5.7.19. Tower Hamlets has a high proportion of workers in the evening and night-time economy. As such, in order to better serve those who are unable to access services during normal business hours the policy encourages late-opening and 24-hour shops and services in the boroughs town centres. This will benefit those socially isolated groups who are limited in their ability to engage in daytime activities as a result of their employment situation.

- 5.7.20. **Physical activity:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Physical activity levels within LBTH due to the lack of inclusion of active travel measures, however, the physical proximity of town centre services to residents may encourage active travel to be favoured as a result of improved accessibility
- 5.7.21. **Green Infrastructure:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Green Infrastructure within LBTH due to the lack of policy relating to the inclusion of green infrastructure.
- 5.7.22. **Climate change resilience:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Climate change resilience within LBTH due to the lack of policy relating to the mitigation of climate risk factors like flooding and overheating.

**Table 5-6 – Town Centres Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>TC1</b>	0	+/-	+	+	0	+/-	+	0	0	0	+ Younger people Low income groups and unemployed +/- Older people Socially excluded groups	Developments should seek to improve the public realm.
<b>TC2</b>	+	+	+	+	0	+	+	0	0	0	No specific groups have been identified.	No mitigation measures have been identified.
<b>TC3</b>	0	0	0	+	0	+	+	0	0	+	No specific groups have been identified.	Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the function of designated employment locations.
<b>TC4</b>	0	0	0	+	0	+	0	0	0	0	+ Low-income groups and unemployed	No mitigation measures have been identified.
<b>TC5</b>	0	+	0	+	+	+	0	0	0	0	+ Low-income groups and unemployed Young people People with existing health conditions	It is recommended that waiting delivery drivers are prevented from acting as obstacles to users, including disabled users. If required this will be covered in a transport management plan.
<b>TC6</b>	0	0	0	+	0	0	+	0	0	0	+ Low-income groups and unemployed Young people	Developments should seek to improve the public realm.  Hot food takeaway and gambling premises should continue to be placed away from areas where vulnerable groups such as children and low-income groups may frequent.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
TC7	0	-	0	+	+	0	+	0	0	0	+ Low-income groups and unemployed Young people Socially excluded or isolated groups - Children And young people Older people	The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis.  Operation of the evening economy should be considered in tandem with safety measures to protect groups who could be more likely to be a victim of hate crimes.  More emphasis should be placed on ensuring that nighttime uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.
TC8	0	0	+	+	0	0	0	0	0	0	No specific groups have been identified.	Ensure accessibility standards are adhered to in short-stay accommodation

## 5.8 Community Infrastructure

### Assessment Summary

- 5.8.1. The assessment identified the following social groups that could be affected by Community Infrastructure policies:
- Infants and children;
  - Young people;
  - Older people;
  - People with long term health conditions;
  - People with disabilities; and
  - Socially excluded or isolated groups.
- 5.8.2. Community infrastructure policies aim to ensure the protection and enhancement of social and community facilities throughout the borough, including supporting new developments. These policies will have predominantly positive effects upon the community of LBTH. These policies are anticipated to benefit children and young people, older people, people with disabilities, people with long term health conditions, and socially excluded groups.
- 5.8.3. The provision of social infrastructure and facilities under the theme includes the provision of education facilities within the borough. This could potentially have positive effects for children and young people through increasing education levels and improving skills. Increasing levels of education among children in LBTH is likely to contribute to higher employability and an improved quality of life for children.
- 5.8.4. The improvement of social infrastructure such as parks and sports centres will also increase social cohesion and safety within the borough. This will benefit many social groups through providing areas for the community to interact. New community facilities should also enhance feelings of safety throughout the community.

### Community Infrastructure Assessment

- 5.8.5. The assessment of the Community Infrastructure policies on each of the determinants of health have been detailed below.

**Air Quality:** Policy CI3: New and enhanced community facilities, seeks to ensure that development proposals for new community facilities take into consideration air quality levels as set out in the relevant guidance from the Department for Education and Sport England. The location of early education and childcare facilities in particular must meet the needs of young children and promote their development, doing this by being located away from areas of poor air quality. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents, especially infants and children in the borough.

**Noise:** Policy CI4: 'Development proposals demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity... (e.g. providing sufficient sound insulation) in line with the agent of change principle'. Compliance with

Policy CI4 should ensure that any potential adverse effects created by noise should be mitigated by specific measures (e.g. sounds insulation).

**Housing and Homelessness:** The policies outlined within this theme are unlikely to directly impact upon housing and homelessness within LBTH. By ensuring community facilities are located in accessible locations to housing, the quality of housing is indirectly improved through this theme.

**Economy and employment:** The improvement of social infrastructure establishments, such as health facilities, childcare facilities, and other services, are likely to provide additional high quality employment opportunities within LBTH. The provision of services related to childcare is particularly beneficial to women and caregivers as it may enable them to re/enter the employment market.

However, the ability for local residents to take up new employment opportunities will be dependent on the available skills in the resident population of LBTH. Where these skills are not available within current residents, roles may be filled with out of borough residents diluting the benefits to the local resident population.

**Skills and education:** The NLP will support the development of education facilities. This will ensure that children and young people in the borough have high quality facilities which enable them to attain good qualifications and educations. The policy includes a specific reference to the requirement for educational support needed for care leavers who may have experienced disruption to education in earlier years, and as such are especially in need of upskilling and educational opportunities.

**Social cohesion and community safety:** This theme has the potential to benefit social cohesion amongst the borough's population. The policies proposed within this theme include the preservation and enhancement of recreation facilities and other facilities used as social hubs. The development of such facilities may improve social cohesion and encourage those who are socially isolated to utilise facilities. Socialisation is a crucial aspect in improving the mental health and wellbeing of the population, especially those currently experiencing social isolation. New community facilities should also enhance feelings of safety through the use of passive surveillance.

**Access to services:** The policies proposed within this theme focus on improving and preserving access to services to all communities, which could assist in maintaining and improving the quality of life of a number of vulnerable groups, including the disabled, young people, old people, socially isolated, or those who have long term health conditions.

Policies under this theme support development proposals that maximise the opportunities for the provision of high-quality community facilities to serve a wide range of users. Services aim to be accessible to a wider community outside of core-hours to better meet the needs of different groups, delivering social value to the community. Additionally, the provision of multi-purpose and shared facilities such as sport and cultural facilities provide opportunities to integrate a range of community users and enhance social interactions.

**Physical activity:** Policy CI1: The council will expect development proposals to contribute to the capacity, quality, usability, inclusivity and accessibility of existing community facilities, particularly where development will increase demand. Community facilities include indoor sports and leisure facilities and have the potential to improve physical activity levels in the borough, leading to a potential reduction in incidents of obesity and the proportion of residents who are overweight. These positive effects could potentially impact across all demographic groups. Physical activity may be indirectly encouraged by the improved accessibility and safety of open spaces as brought about by the proposed policies.

**Green Infrastructure:** The policies outlined within the Community Infrastructure theme are unlikely to directly impact upon Green Infrastructure within LBTH due to the lack of policy relating to the inclusion of green infrastructure.

**Climate change resilience:** The policies outlined within the Community Infrastructure theme are unlikely to directly impact upon Climate change resilience within LBTH due to the lack of policy relating to the mitigation of climate risk factors like flooding and overheating.

**Table 5-7 – Community Infrastructure Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation	
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience			
<b>CL1</b>	0	0	0	+	0	+	+	0	0	0	+	Children and young people Older people People with disabilities and mobility impairment People with existing health conditions Unemployed and low-income groups Socially excluded or isolated groups	The policy should ensure that improvements to existing community facilities are targeted so that all facilities meet the same standards of quality and service provision, ensuring all residents have access to facilities that meet their needs.
<b>CL2</b>	0	0	0	+	0	+	+	0	0	0	+	Children and young people Older people People with disabilities and mobility impairment People with existing health conditions Unemployed and low-income groups Socially excluded or isolated groups	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
<b>CL3</b>	+	0	0	+	0	+	+	0	0	0	+	Children and young people Low income groups Socially excluded or isolated groups	New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.  All new community infrastructure developments will need to outline plans for the implementation of green infrastructure.
<b>CL4</b>	0	+	0	0	0	+	0	0	0	0	+	Younger people	No mitigation measures have been identified.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Older people	
<b>CL5</b>	0	0	0	0	0	0	0	0	0	0	No specific groups have been identified.	No mitigation measures have been identified.

## 5.9 Biodiversity and Open Space

### Assessment Summary

- 5.9.1. The assessment identified the following social groups that could be affected by Biodiversity and Open Space policies:
- Children and young people;
  - Older people;
  - People with disabilities and mobility impairment; and
  - Socially isolated groups including new and expectant mothers.
- 5.9.2. Biodiversity and open space policies focus on enhancing open space throughout the borough in terms of quantity, quality, functionality and accessibility. These policies are anticipated to impacts on most health determinants, including positive effects for children and young people, older people, people with disabilities and mobility impairments, and socially isolated groups including new and expectant mothers.
- 5.9.3. The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's open spaces. Access to open spaces including parks as well as food growing spaces provides spaces for socially isolated groups like new and expectant mothers to meet and socialise.
- 5.9.4. Open spaces also provide ideal opportunities for recreation and leisure which will in turn promote physical activity and healthy lifestyles for the population. Physical activity in young children is particularly targeted through the improvement to play spaces throughout the borough.
- 5.9.5. Improved access to these spaces under this theme will enhance the benefit experienced through socialisation and physical activity opportunities.
- 5.9.6. Opportunities for education arise from the inclusion of the food growing policy, with young children particularly benefitting from this.
- 5.9.7. Climate change resilience is also considered under this theme, with urban greening positively contributing to the climate change resilience of the borough.

### Biodiversity and Open Space Assessment

- 5.9.8. The assessment for Biodiversity and Open Space policies against each of the determinants of health have been outlined below.
- 5.9.9. **Air Quality:** Under this theme the air quality benefits of biodiversity are supported. Policy BO4: Biodiversity and access to nature, states that development proposals must enhance biodiversity and contribute to nature recovery within the borough. Urban greening and the provision of living building elements is considered especially beneficial in areas of sub-standard air quality throughout the borough. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents and workers in the borough.

- 5.9.10. **Noise:** There are unlikely to be any direct impacts upon noise as a result of the biodiversity and open space policies within LBTH.
- 5.9.11. **Housing and Homelessness:** There are unlikely to be direct impacts on housing due to biodiversity and open space policies within LBTH. Improved access to open space and food growing spaces for new housing development proposals may indirectly benefit the borough's housing stock. There are unlikely to be direct impacts on Homelessness due to the biodiversity and open space policies within LBTH.
- 5.9.12. **Economy and employment:** Well designed and accessible open spaces can offer valuable economic contributions to the borough. The safeguarding of water spaces throughout the borough under this theme enables the continuation of their positive contribution to the local economy. In relation to water, the Thames Vision set out by BO1: Green and blue infrastructure which promotes the management of the River Thames involves job creation associated with the river.
- 5.9.13. **Skills and education:** Policy BO7: Food growing, promotes opportunities for education via the provision of food growing spaces throughout the borough. Existing allotments will be protected under this policy and the provision of new food growing spaces maximised. There are unlikely to be direct impacts on Skills due to biodiversity and open space policies within LBTH.
- 5.9.14. **Social cohesion and community safety:** Preservation of existing open spaces including parks and the generation of new ones within the borough is likely to improve social cohesion by providing areas which foster opportunities for socialisation. This is most likely to benefit those who are socially isolated such as new and expectant mothers.
- 5.9.15. Policy BO7: Food growing is also likely to provide opportunities for social interactions across the borough. This will be especially beneficial for new and expectant mothers as they provide leisure and education for children, while being able to engage in social encounters themselves. Socially isolated groups are also likely to benefit from the social nature of gardening in communal spaces and on allotments.
- 5.9.16. The theme also involves improving access to such spaces, enabling even greater engagement and therefore beneficial impact from them.
- 5.9.17. Public realm enhancements under this theme include street crossing and other safety measures. Safety relating to water spaces is especially highlighted, including the provision of riparian lifesaving equipment such as grab chains and access ladders where necessary.
- 5.9.18. **Access to services:** Under this theme access to key services will be enhanced as part of a wider effort in public realm improvements associated with the Green Grid Strategy. Accessibility of the wider network by those with disability and mobility impairments is also considered.
- 5.9.19. **Physical activity:** All policies under this theme will positively contribute to the promotion of active and healthy lifestyles throughout the borough.

- 5.9.20. Preservation of existing open spaces including parks and the generation of new ones within the borough is likely to increase the number of people visiting open spaces and utilising these spaces for leisure and recreation. This is most likely to impact upon young people, adults, and older people who utilise these areas. This is also especially important to the Bangladeshi community, who currently are the most likely group in the borough to say that they do not have access to spaces with opportunities for play and recreation, the main reason being the lack of parks and green spaces in their local area<sup>24</sup>.
- 5.9.21. Policy BO6: Play and recreation spaces recognises the importance of play spaces as key components in the physical activity levels and overall development of young children. The enhancement of recreational spaces for this purpose will aid in meeting the physical activity needs of the younger population in the borough.
- 5.9.22. **Green Infrastructure:** All policies under this theme positively contribute to the provision of green infrastructure. The theme primarily involves the maintenance and enhancement of green infrastructure provision throughout the borough. All existing open space will be protected, and in line with the Green Grid Strategy, will undergo quality, functionality and accessibility improvements. Opportunities to create new open space will also be maximised under this theme.
- 5.9.23. **Climate change resilience:** The NLP recognises that areas of biodiversity deficiency are particularly at risk of experiencing the Urban Heat Island effect. Urban greening as set out by this theme will positively contribute to climate change resilience throughout the borough.

**Table 5-8 – Biodiversity and Open Space Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>BO1</b>	+	+	0	+	0	+	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	No mitigation measures have been identified.
<b>BO2</b>	+	+	0	0	0	+	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	New parks and open spaces should be accessible to all members of the public.  Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points.  Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.  Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.
<b>BO3</b>	0	0	0	0	0	+	0	0	+	+	No specific groups have been identified.	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
<b>BO4</b>	+	0	0	0	0	+	0	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>BO5</b>	+	0	0	0	0	+	0	0	+	+	+ Low-income groups Socially excluded or isolated groups	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.
<b>BO6</b>	0	0	0	0	0	+	0	+	+	+	+ Children and young people People with disabilities and mobility impairment Low-income groups	<p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>The policy might encourage business and facilities to open in play and recreational spaces as well as ensure active travel routes increase the busyness of parks. A busier, more vibrant environment will lessen the prevalence of idle parks that promote fear in women, especially mothers.</p>
<b>BO7</b>	+	0	0	0	+	+	+	+	+	+	+ Socially excluded or isolated groups Low-income groups	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.

## 5.10 Movement and Connectivity

### Assessment Summary

- 5.10.1. The assessment identified the following social groups that could be affected by Movement and Connectivity policies:
- Low-income groups; and
  - Socially isolated groups including new and expectant mothers.
- 5.10.2. The Movement and connectivity policies outline improvements to travel options throughout the borough, facilitating the increase of active and sustainable modes of travel. These policies are anticipated to impacts on most health determinants, including positive effects for low-income groups and socially isolated groups including new and expectant mothers in particular.
- 5.10.3. The theme is particularly supportive of improvements to settings for social cohesion throughout the borough. Healthy streets will foster vibrant and lively communities where different social groups can socialise and enjoy public space together. Safety is also highlighted within this theme, with requirements that new connectivity developments do not adversely impact the safety of the boroughs existing walking and cycling network.
- 5.10.4. The theme is widely beneficial to the physical activity levels of different social groups across the borough. Improvements to accessibility and connectivity of current pedestrian routes will encourage residents to engage with active transport, having beneficial impacts for the overall health and wellbeing of the population. The inclusion of town centres within the 15-minute neighbourhood principle may also improve physical activity rates.
- 5.10.5. While climate change resilience is not directly built into the policies proposed under this theme, the reduced reliance on private vehicles brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.

### Movement and Connectivity Assessment

- 5.10.6. The assessment for Movement and Connectivity policies against each of the determinants of health are outlined below.
- 5.10.7. **Air Quality:** Sustainable travel as proposed by this theme aims to tackle the significant issues with air quality associated with highway congestion and capacity constraints across public transport networks. Improved access to public and active transport across the borough with the aim to reduce reliance on private vehicles will help relieve congestion and improve air quality. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents and workers in the borough.
- 5.10.8. **Noise:** In general, the encouragement of sustainable and active transport modes within these policies of are likely to reduce noise within LBTH. Specifically, road noise is likely to be reduced due to encouragement of a modal shift away from private car use.

- 5.10.9. Some developments supported by these policies could, if not well managed, increase noise pollution. However, Policy MC5: Sustainable delivery, servicing, and construction seeks to reduce the impact of delivery, servicing, and construction traffic on the environment and the health and well-being of residents, including in association with impacts of noise pollution. Housing and Homelessness: The policies outlined within the Movement and connectivity theme are unlikely to directly impact upon Housing and homelessness within LBTH.
- 5.10.10. **Economy and employment:** Policy MC5: Sustainable delivery, servicing, and construction seeks to support the deliveries and services that are essential to the economic growth of the borough.
- 5.10.11. **Skills and education:** The policies outlined within the Movement and connectivity theme are unlikely to directly impact upon Skills and education within LBTH.
- 5.10.12. **Social cohesion and community safety:** Numerous policies under this theme foster improved settings for social cohesion throughout the borough. In particular, the implementation of Healthy Streets supports many types of active travel, from commuting to work, to walking for pleasure, or cycling with children to school. Healthy streets will support vibrant and lively communities, where multiple social groups can come together to socialise and enjoy public spaces.
- 5.10.13. Additionally, the design and management of new connectivity development under this theme must ensure the development does not adversely impact the safety of the transport network throughout the borough. Development proposals that adversely impact the safety of the borough's walking and cycling network will not be supported. Improved settings for socialisation are particularly beneficial for socially isolated groups like new and expectant mothers.
- 5.10.14. Under policy MC5: Sustainable delivery, servicing, and construction, construction management plans and/or delivery and servicing plans are required to show how the Community Safety (CLOCS) standard has been incorporated.
- 5.10.15. **Access to services:** These policies are likely to improve overall connectivity within the borough, providing greater access to services and facilities.
- 5.10.16. The application of the Healthy Streets (Policy MC2: Active Travel and Healthy Streets) will help to simplify routes towards services for those who are elderly, disabled, or have sensory issues.
- 5.10.17. The improvement in public transport provision will improve access to other areas of the borough, as well as out of borough for those who routinely use public transport method.
- 5.10.18. This will most benefit young people, older people, those with disabilities, and socially isolated people, through allowing increased access to previously harder-to-access areas.
- 5.10.19. **Physical activity:** Healthy Streets, as proposed under this theme, supports many types of active travel; from commuting to work, to walking for pleasure, or cycling with children to school. This policy includes improvements to the accessibility and connectivity of

current pedestrian routes throughout the borough and into neighbouring boroughs. The support of such travel enables residents to engage in physical activity, having beneficial impacts for the overall health and wellbeing of the population.

- 5.10.20. Policies under this theme will work harmoniously with the borough's Transport Strategy to increase opportunities for active travel, with people becoming physically healthier. London has a 15-minute city concept, and the borough's location within inner London aims to align with this principle. Positive impacts will likely result from the encouragement of active travel such as walking or cycling to town centres due to their proximity to residential areas. The NLP will also provide delivery of high quality cycle provision and improved footways to support active travel.
- 5.10.21. In 2017/18, 33% of the poorest fifth of households in the UK did not have access to a car. On top of this, bus fares have increased by 47% since 2015. In accordance with this UK context for transport accessibility relating to finance, the 15-minute neighbourhood principle is beneficial for groups who struggle to afford public transportation costs such as low-income groups as it enables them to utilise active travel to get to work, generating significant cost savings.
- 5.10.22. **Green Infrastructure:** Policies under this theme commit to safeguard and contribute to maintaining and enhancing the borough's network of walking routes and cycleways, including the Thames Path and the Green Grid Network. The Green Grid Strategy works towards improving cross-borough connections, encouraging active travel and urban greening.
- 5.10.23. **Climate change resilience:** Reduced reliance on private vehicles as brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.

**Table 5-9 – Movement and Connectivity Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>MC1</b>	+	+	0	+	+	+	+	+	+	+	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	<p>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.</p> <p>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.</p>
<b>MC2</b>	+	+	0	0	0	+	+	+	+	+	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	<p>Active travel infrastructure should be accessible and inclusive.</p> <p>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p>

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<b>MC3</b>	+	+	0	0	0	+	+	0	0	0	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	No mitigation measures have been identified.
<b>MC4</b>	0	0	0	+	0	0	+/-	0	0	0	+/- Older people People with disabilities and mobility impairment Low-income groups	It is recommended that the Purple Badge Scheme is implemented to ensure there will be no negative impacts on protected groups, such as disabled people. Management should protect priority bays to maintain accessibility for protected groups.
<b>MC5</b>	+	+	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.

## 5.11 Reuse, Recycling and Waste

### Assessment Summary

- 5.11.1. The assessment identified the following social groups that could be affected by Reuse, Recycling and Waste policies:
- All residents and workers
  - Older people
  - Children and young people.
- 5.11.2. Reuse, Recycling and Waste policies will have some positive effects on the health determinants identified across a selection of social groups within the borough.
- 5.11.3. Primarily, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.
- 5.11.4. New and improved waste storage facilities in new housing developments will improve the housing stock of the borough. Unfortunately, existing houses will not necessarily see improvements of the same nature under this policy, and so the distribution of beneficial effects is limited.
- 5.11.5. Climate change resilience is encouraged in the design of waste management facilities through the encouragement attachment to the district heating network and/or incorporation of opportunities for energy recovery and combined heat and power.

### Reuse, Recycling and Waste Assessment

- 5.11.6. The assessment for Reuse, Recycling and Waste policies against each of the key determinants of health have been outlined below.
- 5.11.7. **Air Quality:** Policy RW2: New and enhanced waste facilities, seeks to ensure that development proposals to construct new waste facilities do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
- 5.11.8. Waste facilities should incorporate an air filtering system to reduce airborne particulate concentrations in and outside of the building, in line with Environment Agency advice. The policy also seeks to mitigate adverse air quality impacts associated with waste facilities. Improvements to air quality will be particularly beneficial for older people, infants, and those with long term health conditions.
- 5.11.9. Policies seek to locate waste facilities as far away as possible from sensitive receptors (such as residential uses, schools, nurseries, and health facilities), and seek to mitigate adverse air quality impacts associated with waste facilities. Policy RW2 also seeks to minimise amenity impacts on surrounding areas in terms of air quality and impacts on the transport network, according with Agent of Change principles.

- 5.11.1. **Noise:** Policy RW2: New and enhanced waste facilities, seeks to ensure that development proposals to construct new waste facilities do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.
- 5.11.2. **Housing and Homelessness:** RW3 Waste storage facilities within new housing developments should be designed to avoid any adverse amenity impacts. Existing homes will not necessarily see improvements of the same nature under this policy, limiting the distribution of beneficial effects.
- 5.11.3. **Economy and employment:** Under this theme, development proposals to construct new waste facilities that demonstrate effective implementation of the waste hierarchy and its contribution to the circular economy will be supported. Waste-derived recycled materials are a key option for recovering value throughout the supply chain in relation to the circular economy.
- 5.11.4. **Skills and education:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Skills and education within LBTH.
- 5.11.5. **Social cohesion and community safety:** Development proposals that demonstrate accordance with Agent of Change principles to minimise amenity impacts on surrounding areas will be supported (RW2). Additionally, the locating of waste facilities away from residential areas will be beneficial to the health and safety of residents.
- 5.11.6. **Access to services:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Access to services within LBTH.
- 5.11.7. **Physical activity:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Physical activity levels within LBTH.
- 5.11.8. **Green Infrastructure:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon green infrastructure within LBTH.
- 5.11.9. **Climate change resilience:** To minimise the impact on climate change, waste management facilities under this theme are encouraged to incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power.

**Table 5-10 – Reuse, Recycling and Waste Summary**

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<i>Reuse, recycling and waste</i>												
<b>RW1</b>	0	0	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.
<b>RW2</b>	+	+	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.
<b>RW3</b>	0	0	+	+	0	0	0	0	0	+	No specific groups have been identified.	Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.

## 6 Conclusion

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### 6.1 Summary

- 6.1.1. On the whole the NLP is likely to result in a number of positive effects across the determinants of health and vulnerable groups, however there is potential for some policies to have adverse effects. A summary of the key effects has been detailed below:
- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Future policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads, which could contribute to a worsening of air quality. However, all construction sites in the borough will be expected to meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice in relation to dust and air quality.
  - **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, contributing to increased road traffic noise in the area. Improvements to entertainment venues and the night-time economy will also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction and developments throughout the Borough, reducing the levels of nuisance felt to those living in close proximity to developments.
  - **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for the Future theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation. This could have positive effects for many vulnerable groups, predominantly working aged adults (18-74) and those who are homeless.
  - **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the Borough. In particular, the provision and protection of affordable workspaces will aid in supporting new and emerging economic sectors in the borough. Additional town centre developments and an increase in shops, entertainment venues and food and drink facilities under the NLP is also likely to reduce unemployment in the Borough, having positive effects for the unemployed and low-income residents in the Borough.
  - **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access

to education and training. Upskilling opportunities will be particularly beneficial to the health of young people throughout the borough.

- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces theme include safety measurements such as appropriate signage of public areas, good lighting and surveillance. The promotion of a safe living environment will contribute positively to the physical and mental wellbeing of all residents.
- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the Borough will have suitable access to community facilities and shops. Additionally, policies under the Community Infrastructure theme support development proposals to maximise opportunities for the provision of high-quality community facilities. Access to services will improve the health of elderly residents, improving health and reducing loneliness.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel, from commuting to work to walking for pleasure. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population. Further, the inclusion of town centres within the 15-minute neighbourhood principle may improve physical activity rates.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policies. This includes the protection and enhancement of existing biodiversity throughout the borough as well as new provisions to contribute a 30% Biodiversity Net Gain (BGN). The maintenance of green infrastructure and accessible open spaces contributes to improving mental wellbeing by providing spaces for physical activity and social interaction. Green infrastructure could be further promoted through additional requirements under the Homes for the Community theme.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the Borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

## 6.2 Recommendations

6.2.1. A number of recommendations have been identified which have been outlined in Table 6-1 below. These changes will be considered by LBTH during the preparation of the preferred plan for Regulation 19 consultation.

**Table 6-1 – HIA Recommendations**

Policy/ Theme	Recommendation
Policy DV6	Social value contributions would be enhanced through specific implementation of plans to encourage communities meaningful engagement in local and regional decision-making.
Policy HF1	Tenants should be limited to one private vehicle per household. Housing needs should be considered to include Electric Vehicle Charging Facilities. This way, residents are encouraged and supported to switch to electric vehicles for private usage and the potential adverse air quality impacts of new housing and associated increases in vehicle emissions will be lessened.
Policy HF1	Increased demand on services throughout the borough as a result of the growing population will require the strengthening of services. This should take the form of provision of new facilities as well as the employment of additional staff.
Policy HF6	All purpose-built student accommodation should have a noise nuisance curfew in place between 11pm and 7am. This should be communicated to all new residents upon the start of their tenure as well as potential penalties they could face in instances of breaking the curfew.
Policy CG4	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
Policy PS1	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
Policy PS2	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.

Policy/ Theme	Recommendation
	Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
Policy PS10	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.
Policy TC7	More emphasis should be placed on ensuring that nighttime uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.
Policy CI1	The policy should ensure that improvements to existing community facilities are targeted so that all facilities meet the same standards of quality and service provision, ensuring all residents have access to facilities that meet their needs.
Policy CI3	All new community infrastructure developments will need to outline plans for the implementation of green infrastructure.
Policy BO2	<p>New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p>
Policy BO6	<p>Part 2 (b) could include mention of suggested measures to tackle barriers to inclusion and equality.</p> <p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p>
Policy BO7	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.



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London Borough of Tower Hamlets

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# **New Local Plan (Regulation 19)**

Habitats Regulations Assessment



London Borough of Tower Hamlets

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## **New Local Plan (Regulation 19)**

### **Habitats Regulations Assessment**

**Type of document (version) Public**

**Project no. 70093878**

**Our Ref. No. 002**

**Date: July 2024**

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# Quality control

Issue/revision	First issue for client comment	Revision 1	Revision 2	Revision 3
Remarks	Draft	Final for Reg 19		
Date	June 2024	July 2024		
Prepared by	Soham Dixit	Soham Dixit		
Signature				
Checked by	Jo Rochfort	Jo Rochfort		
Signature				
Authorised by	Owen Peat	Owen Peat		
Signature				
Project number	70103752	70103752		
Report number	HRA_Reg_19	HRA_Reg_19		
File reference	\\uk.wspgroup.com\central data\Projects\70103xxx\70103752 - Tower Hamlets Local Plan IIA\03 WIP\07 HRA			

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# 1 Introduction

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- 1.1.1 The London Borough of Tower Hamlets (hereafter referred to as LBTH) is in the process of preparing a new Local Plan for the Borough.
- 1.1.2 The current Local Plan was adopted in January 2020 and covers the period up to 2031<sup>1</sup>. Under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Councils are required to regularly review and update their Local Plans to ensure that they are fit for purpose. Therefore, the LBTH is currently preparing a new Local Plan to guide development within the borough up to 2038. The Local Plan will identify the location, scale and uses of development that will come forward within the borough and demonstrate how the needs of Tower Hamlet's current and future population will be met. This includes a target to secure delivery of at least 52,095 new homes across the borough between 2023 and 2038, which includes a proportion (34,730 homes) set by the London Plan (2021)<sup>2</sup> as part of a ten-year housing target (for the period 2019/20 to 2028/29).
- 1.1.3 Prior to adoption, the new Local Plan must go through several stages of review, consultation and engagement. This includes: initial preparation and consultation on what the Local Plan should contain (Regulation 18), production of a Publication Draft Local Plan (Regulation 19), submission of the Local Plan to the Secretary of State for Housing, Communities and Local Government (Regulation 22), and finally public examination (Regulation 24). Consultation on the Regulation 18 version on the Local Plan took place between 6<sup>th</sup> November and 18<sup>th</sup> December 2023 and the Council are currently preparing the Regulation 19 Consultation Draft.
- 1.1.4 The Local Plan is a statutory document<sup>3</sup> that forms part of the Council's strategy to deliver sustainable development, tackle climate change and deliver new homes, jobs and infrastructure for current and future LBTH residents. Local Plans must be positively prepared, justified, effective and consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF)<sup>4</sup>.

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<sup>1</sup> London Borough of Tower Hamlets (2020) Tower Hamlets Local Plan 2031. Managing growth and sharing the benefits. Available at: [Local plan \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/local-plan)

<sup>2</sup> Mayor of London (2021) The London Plan. Available at [the london plan 2021.pdf](https://www.london.gov.uk/plan-the-city)

<sup>3</sup> Section 19 of the Planning and Compulsory Purchase Act 2004 sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while regulation 10 states what additional matters local planning authorities must have regard to when drafting their local plans.

<sup>4</sup> The National Planning Policy Framework 2023. Available online: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.1.5 The Local Plan sits within a wider framework of planning documents, including national guidance set out by the government in the NPPF (as referenced above), regional and city planning policies and guidance, strategic plans, supporting strategies and background studies. The Local Plan will form the basis on which planning applications will be determined within LBTH’s administrative area.
- 1.1.6 WSP has been appointed by LBTH to undertake the Habitats Regulations Assessment (HRA) for the Local Plan, which has progressed to the Regulation 19 stage. The focus of the HRA process is on identifying the potential for adverse effects as a result of the Local Plan policies on the integrity of European nature conservation sites and other designations addressed through HRA as a matter of policy (hereafter referred to as “Habitats sites”).
- 1.1.7 Under The Conservation of Habitats and Species Regulations 2017<sup>5</sup> (as amended) (the ‘Habitats Regulations’) ‘Competent Authorities’ must assess plans and projects for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites.
- 1.1.8 This exercise identifies all relevant Habitats sites where LSE could occur and the information captured here will form the evidence base for this Stage 1 HRA (Screening). Further consideration of LSE is then provided within the Stage 2 Appropriate Assessment (see Methodology Section 2).

## 1.2 Report Framework

- 1.2.1 This HRA screening report has been produced as a part of the Integrated Impact Assessment (IIA) that incorporates the requirement of a Strategic Environmental Assessment (SEA) for the Local Plan and associated plans.
- 1.2.2 At a screening level, this report will ensure that all HRA-related considerations are fully integrated into the Local Plan documents as they develop.
- 1.2.3 This report details:
  - the HRA process and methodology for assessment;
  - the relevant Habitats sites within the Zone of Influence (Zol) for the Local Plan policies;
  - the challenges of the Local Plan policies and how these may impact upon relevant Habitats sites;

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<sup>5</sup> The Conservation of Habitats and Species Regulations 2017. Available at: [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

- the screening of LSE (Stage 1) of the Local Plan policies (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*<sup>6</sup>), and;
- The consideration of potential adverse effects on site integrity within Stage 2 Appropriate Assessment (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*, (WSP 2024).

1.2.4 It should be noted that this HRA has been based solely upon the LBTH New Local Plan policies and does not replace a detailed analysis of any projects that may be brought forwards subsequent to the New Local Plan where additional LSE may arise.

### 1.3 The LBTH Local Plan

1.3.1 The New Local Plan sets out a vision for the future of the Borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of our environment, green spaces and cultural and historic assets.

1.3.2 Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the Borough will develop through to 2040. Further details relating to the Local Plan, including the Local Plan vision and objectives are set out within the Interim Integrated impact Assessment Report (WSP, 2023).

1.3.3 The Local Plan policies which are the focus of this screening exercise are listed in Table 1-1, provided by LBTH. A brief summary of each policy is also given in the screening Table 7-3 Section 7.

**Table 1-1 – Proposed LBTH Local Plan policies screened in the HRA**

Policy number	Title
<b>Delivering on the Local Plan</b>	
DV1	Areas of growth and opportunity within Tower Hamlets
DV2	Delivering sustainable growth in Tower Hamlets

<sup>6</sup> *Air Quality Information Report to Support Habitats Regulations Assessment – London Borough of Tower Hamlets New Local Plan (Regulation 19)*, WSP, June 2024

Policy number	Title
DV3	Healthy communities
DV4	Planning and construction of new development
DV5	Developer contributions
DV6	Social value
DV7	Utilities and digital connectivity
DV8	Site Allocations
<b>Homes for the Community</b>	
HF1	Meeting housing needs
HF2	Affordable housing and housing mix
HF3	Protection of existing housing
HF4	Supported and specialist housing
HF5	Gypsy and traveller accommodation
HF6	Purpose-built student accommodation
HF7	Large-scale purpose-built shared living
HF8	Housing with shared facilities (houses in multiple occupation)
HF9	Housing Standards and Quality
<b>Clean and Green Future</b>	
CG1	Mitigating and adapting to a changing climate
CG2	Low energy buildings
CG3	Low carbon energy and heating
CG4	Embodied carbon, retrofit and the circular economy
CG5	Overheating
CG6	Managing flood risk
CG7	Sustainable drainage

<b>Policy number</b>	<b>Title</b>
CG8	Water efficient design
CG9	Air quality
CG10	Noise and vibration
CG11	Contaminated land
<b>People Places and Spaces</b>	
PS1	Design and infrastructure-led approach to development
PS2	Tall Buildings
PS3	Securing design quality
PS4	Attractive streets, spaces and public realm
PS5	Creating inclusive places
PS6	Heritage and the historic environment
PS7	World heritage sites
PS8	Shaping and managing views
PS9	Shopfronts
PS10	Advertisements, hoardings and signage
PS11	Siting and design of telecommunications infrastructure
<b>Employment and economic growth</b>	
EG1	Creating investment and jobs
EG2	New employment space
EG3	Affordable workspace
EG4	Loss and redevelopment of employment space
EG5	Railway Arches
EG6	Data Centres
<b>Town Centres</b>	

<b>Policy number</b>	<b>Title</b>
TC1	Supporting the network and hierarchy of centres
TC2	Protecting the diversity, vitality and viability of town centres
TC3	Town centre uses outside our town centres
TC4	Markets
TC5	Food and drink
TC6	Entertainment uses
TC7	Evening and night-time activities
TC8	Short-stay accommodation
<b>Community Infrastructure</b>	
CI1	Supporting community facilities
CI2	Existing community facilities
CI3	New and enhanced community facilities
CI4	Public houses
CI5	Arts and Culture facilities
<b>Biodiversity and open space</b>	
BO1	Green and blue infrastructure
BO2	Open spaces and the Green Grid network
BO3	Water spaces
BO4	Biodiversity and access to nature
BO5	Urban greening
BO6	Play and recreation spaces
BO7	Food growing
<b>Movement and Connectivity</b>	
MC1	Sustainable travel

Policy number	Title
MC2	Active travel and healthy streets
MC3	Impacts on the transport network
MC4	Parking and permit-free
MC5	Sustainable delivery, servicing and construction
<b>Reuse, Recycling and Waste</b>	
RW1	Managing our waste
RW2	New and enhanced waste facilities
RW3	Waste collection facilities in new development

## 2 Relevant policy, legislation, case law and guidance

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### 2.1 Legislative Background

- 2.1.1 Under The Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations') 'Competent Authorities' must assess Plans and projects for their potential to cause LSE on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites. Any plan or project that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.
- 2.1.2 Defra guidance<sup>7</sup> states that Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a National Site Network (NSN) on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:
- existing SACs and SPAs; and
  - new SACs and SPAs designated under these Regulations.
- 2.1.3 Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new NSN.
- 2.1.4 It is a matter of Government policy (NPPF paragraph 118) that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (commonly known as Ramsar sites) are also considered in the same way as Habitats sites. Together, these sites are referred to as 'Habitats sites' in the NPPF and in this report.
- 2.1.5 Other site designations of national or local importance are not assessed by the HRA process, but with respect to Sites of Special Scientific Interest (SSSI) these designations largely overlap with European or Ramsar sites.
- 2.1.6 Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:
- fulfil the commitment made by government to maintain environmental protections; and
  - continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

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<sup>7</sup> Defra Policy Paper Changes to the Habitats Regulations 2017 (Published 1 January 2021). Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

2.1.7 This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process, to establish whether or not the LBTH Local Plan will have a LSE upon the NSN and Habitats sites.

2.1.8 The principle of Favourable Conservation Status (FCS) of features within Habitats sites as set out in the original Habitats Directive<sup>8</sup> is central to this assessment. The use of the term FCS is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the term still has the meaning given by Article 1 of the Habitats Directive. Defra guidance<sup>9</sup> does however note that:

*“an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature’s natural range”.*

2.1.9 The Habitats Directive provides further interpretation of the meaning of ‘favourable conservation status’ within Article 1 parts a, e and i as below.

*‘(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);.....*

*(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservative status of a natural habitat will be taken as "favourable" when:*

- *its natural range and areas it covers within that range are stable or increasing, and*
- *the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *the conservation status of its typical species is favourable as defined in (i);*

*(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2; The conservation status will be taken as "favourable" when:*

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<sup>8</sup> The Habitats Directive, European Commission. Available online: [https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\\_en.htm](https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm)

<sup>9</sup> Defra Policy Paper Changes to the Habitats Regulations 2017 (Published 1 January 2021). Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

- *population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis’.*

## 2.2 Stages of Habitats Regulations Assessment

2.2.1 Guidance on managing Natura 2000 sites and the provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC<sup>10</sup> (2018) sets out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), as presented below (with additional interpretation in brackets).

*Article 6(3) defines a step-wise procedure for considering plans and projects.*

*a) The first part of this procedure consists of a pre-assessment stage (‘screening’)\* to determine whether, firstly, the plan or project is directly connected with or necessary to the management of the site, and secondly, whether it is likely to have a significant effect on the site; it is governed by Article 6(3), first sentence. \*(Often commonly referred to in practice as HRA Stage 1 – Screening)*

*b) The second part of the procedure, governed by Article 6(3), second sentence, relates to the Appropriate Assessment\*\* and the decision of the competent national authorities. (A simplified flow chart of this procedure is presented in Annex II at the end of the guidance document). \*\*(Often commonly referred to in practice as HRA Stage 2 – Appropriate Assessment)*

*A third part of the procedure (governed by Article 6(4)) comes into play if, despite a negative assessment, it is proposed not to reject a plan or project but to give it further consideration. In this case Article 6(4) allows for derogations from Article 6(3) under certain conditions.*

*The applicability of the procedure, and the extent to which it applies, depend on several factors, and in the sequence of steps, each step is influenced by the previous step. The order in which the steps are followed is therefore essential for the correct application of Article 6(3).*

2.2.2 As set out in Regulation 3 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 where Natura 2000 sites are referenced in previously issued

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<sup>10</sup> Commission Notice C(2018) 7621 final, Brussels, 21.11.2018 *Managing Natura 2000 sites - The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC* Available in all EU languages from: [http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)

guidance, this should be interpreted as relating to the national site network but does not otherwise affect guidance as it applied, before EU exit day.

- 2.2.3 Under the Habitats Regulations in England and Wales the approach taken to the stage referred to as ‘derogation’ follows the same fundamental steps as established above in EC Guidance, comprising consideration of alternative solutions, IROPI, and compensatory measures.

## 2.3 Relevant Case Law

- 2.3.1 There are a number of recent Court of Justice of the European Union (CJEU) rulings which are relevant to this assessment and these are given below for information. As the general provisions for the protection of Habitats sites and the procedural requirements to undertake HRA to assess the implications of Plans or Projects for Habitats sites remain, this previous case law established prior to the UK's exit from the EU is considered to apply unless superseded by the judgement of an appropriate UK court.

### The Wealden Judgement

- 2.3.2 The Wealden Judgement<sup>11</sup>, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.
- 2.3.3 Prior to this Judgement, it was deemed that air quality impacts on Habitats sites need only be considered alongside roads where the traffic growth associated with the individual Plan or project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07<sup>12</sup>) which has been subsequently withdrawn, namely:
- Increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).
- 2.3.4 The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites should have been carried out and quashed part of the Local Plan that would have led to an

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<sup>11</sup> Judgment in *Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

<sup>12</sup> *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)*. Withdrawn, but available at: <https://standardsforhighways.co.uk/dmr/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae>

in-combination exceedance of 1,000 AADT.

## The People over Wind Case

- 2.3.5 The Court of Justice of the European Union’s (CJEU’s) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)<sup>13</sup> (hereafter referred to as the ‘Sweetman Case’), states that: ‘Article 6(3) ..... must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’
- 2.3.6 In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.
- 2.3.7 This is an emerging issue for local authorities and means that, alongside the Wealden judgement and the potential for ‘in-combination’ effects, the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites, full Appropriate Assessment is more frequently required.

## Cjeu Ruling in The Netherlands Nitrogen and Agriculture Cases C-293/17 And C-294/17

- 2.3.8 The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:
- An ‘Appropriate Assessment’ may only take into account the existence of Article 6(1) ‘conservation measures’, or Article 6(2) ‘preventive measures’, or specific measures adopted for a conservation programme, or ‘autonomous’ measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

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<sup>13</sup> Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta <https://curia.europa.eu/juris/document/document.jsf?jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634>

- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

## 2.4 National Planning Policy

### 2.4.1 National Planning Policy Framework

2.4.2 In relation to biodiversity and the Draft LTP, the following paragraphs in the document are relevant:

- Paragraph 180, which states ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
  - (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
  - (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
  - (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
  - (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
  - (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’

- Paragraph 181 which states ‘Plans should:

*distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’*

## 2.5 Relevant Guidance (Primary Resources)

### 2.5.1 Natural England's Internal Guidance

2.5.2 In June 2018, Natural England published guidance<sup>14</sup> on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. The document draws upon Annex F of the DMRB (now withdrawn) but takes into account the Wealden Judgement and need to assess 'in-combination' effects on Habitats sites as a result of air pollution.

2.5.3 The guidance provides a framework around the assessment of road traffic emissions and subsequent effects on Habitats sites. Notably:

- Step 1 – Does the proposal give rise to emissions which are likely to reach a Habitats Site;
- Step 2 – Are there qualifying features within 200m of a road sensitive to air pollution;
- Step 3 – Could the sensitive qualifying features of the site be exposed to emissions; and
- Step 4 – Application of the Screening Thresholds.
  - Step 4a: apply the threshold alone;
  - Step 4b: apply the threshold in-combination with emissions from other road traffic plans and projects; and
  - Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects.
- Step 5: Advise on the need for Appropriate Assessment where thresholds are exceeded, either alone or in-combination.

2.5.4 The relevant thresholds in relation to Step 4 are as follows:

- Changes in AADT of 1000 vehicles a day (or more); and/or
- Changes of 1% of the relevant Critical Load and/or Level as a result of the Plan/Project.

### 2.5.5 IAQM's GUIDE To the Assessment of Air Quality Impacts on Designated Nature Conservation Sites

2.5.6 The Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (IAQM, May 2020)<sup>15</sup> provides advice for ecologists relating to air quality assessments (AQAs), to evaluate the effects of air pollution on habitats and species, by increasing their

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<sup>14</sup> Natural England (June 2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations at: <http://publications.naturalengland.org.uk/publication/4720542048845824>

<sup>15</sup> Holman et al (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites – v1.1* Available at: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

understanding of the information provided by air quality specialists. The Guide focusses on the AQA process and no specific detail on the subsequent stage of the overall process, i.e. the assessment of the effects that air quality impacts may have on habitats and species, is provided in this guidance.

### 2.5.7 Updated DMRB (LA 115 – Habitats Regulations Assessment)

2.5.8 DMRB document LA 115 - Habitats Regulations Assessment<sup>16</sup> states that HRA shall include systematic collection, assessment, and reporting of the implications of highways projects on Habitats sites and shall be implemented forthwith on all projects involving HRA on the motorway and all-purpose trunk roads. In addition to identifying the habitats site designations to be considered within HRA and the format of reporting, the document sets out (principles and purpose) that:

- The precautionary principle shall be applied in reporting through all HRA stages.
- Recourse to the precautionary principle may be relevant when there:
  1. are "potentially negative effects"; or
  2. is "insufficiency of the data, which makes it impossible to determine with sufficient certainty the risk in question".
- Site conservation objectives should prevail where there is uncertainty.
- Adverse effects should be reported in the HRA in the absence of evidence to the contrary.

### 2.5.9 CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

2.5.10 This guidance<sup>17</sup> from the Chartered Institute of Ecology and Environmental Management is intended to take ecologists (and air quality specialists) through the issues that they should consider in order to make an informed judgement as to the ecological effects of changes in pollution concentrations and deposition rates. The approaches set out build on the advice and guidance from Natural England and IAQM, but focus on the ecologist role to interpret the numerical output of air quality assessments to reach evidence-based conclusions on ecological significance.

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<sup>16</sup> Highways England (November 2019) Design Manual for Roads and Bridges, LA115 – Habitats Regulations Assessment. Available at: <https://standardsforhighways.co.uk/dmrB/search/e2fdab58-d293-4af7-b737-b55e08e045ae> .

<sup>17</sup> CIEEM (January 2021) *Advisory Note: Ecological Assessment of Air Quality Impacts*. Available at: <https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/#:~:text=Advisory%20Note%3A%20Ecological%20Assessment%20of%20Air%20Quality%20Impacts..of%20changes%20in%20pollution%20concentrations%20and%20deposition%20rates> .

### 2.5.11 Additional guidance

2.5.12 Multiple sources of guidance are available to HRA practitioners which are specific to interpretation of assessment processes or technical areas of assessment. Where relevant, these are cited within this report.

## 3 Methodology

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- 3.1.1 This report presents the findings of the Screening undertaken as part of Stage 1 of the HRA process to establish whether or not the likely impacts of the LBTH Local Plan could have LSE on Habitats sites.
- 3.1.2 This document provides this information by undertaking the following steps:
- determining whether the Plan is directly connected with or necessary for the management of applicable Habitats sites;
  - describing the Plan impacts that may have the potential for significant effects upon applicable Habitats sites; and
  - describing the potential pathways of impacts, both alone and in-combination with other plans and projects.
- 3.1.3 The precautionary principle is applied at all stages of the HRA process. In relation to screening this means that plans and projects where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, Appropriate Assessment.
- 3.1.4 The first step of the review is to establish whether the LBTH Local Plan should be subject to HRA.
- 3.1.5 Depending on the conclusion of this step, the assessment progresses to information gathering; in particular the identification of Habitats sites which will likely require consideration and on which background information is collated. This information includes the qualifying features of these sites, the conservation objectives and the sensitivities of those sites.
- 3.1.6 As part of the information gathering stage, in the assessment of Local Plans consideration is generally given to the air quality sensitivities of these Habitats sites, specifically their qualifying features, to changes in both nitrogen oxide (NO<sub>x</sub>) and ammonia (NH<sub>3</sub>) concentrations and nitrogen (N) deposition and then consideration of these changes in relation to the Critical Level and relevant Critical Loads<sup>18</sup>.
- 3.1.7 For those Habitats sites with identified pressures or threats associated with air quality, further detailed assessment is provided within the supporting *Air Quality Information Report to Support Habitats Regulations Assessment* (WSP, 2024) and summarised here.
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<sup>18</sup> Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.

3.1.8 The final element of the information gathering stage is to review the availability of relevant data sets and sources which will form the evidence base of the assessment of the Local Plan policies alone and in-combination with other relevant plans and projects. Information on sources of HRA guidance are given below and the legislative and policy background including the relevant CJEU rulings, are given in Appendix A.

## 4 Review Results

### 4.1 Is HRA required?

4.1.1 The review looked to specifically answer each of the questions set out in the HRA review methodology. It should be noted that the level of detail of the Local Plan only allows for an anticipated assessment of the need for HRA based on experience of similar plans and projects (see Table 4-1 below).

**Table 4-1 – Is HRA required?**

	Question	Response
1	Is the whole of the plan directly connected with or necessary to the management of a Habitats site for nature conservation purposes?	No
2	Is the plan a 'strategic development plan' or 'local development plan' or 'supplementary guidance' or a core path plan or a revision thereof?	Yes
3	Does the plan provide a framework for deciding applications for project consents and / or does it influence decision makers on the outcome of applications for project consents?	Yes
4	Does the plan contain a programme, or policies, or proposals which could affect one or more particular Habitats site?	Yes
5	Is the plan a general statement of policy showing only the general political will or intention of the plan-making body, and no effect on any particular Habitats site can reasonably be predicted?	No

4.1.2 When the answer to either questions (1) or (5) is 'no', but the answer to any of questions (2), (3) or (4) is 'yes', then the requirement for further HRA is identified.

4.1.3 In this case, the answers to questions (1) and (5) are both 'no', while the answers to questions (2) to (4) are all 'yes'. It is therefore confirmed based on the availability of current information that the LBTH Local Plan does therefore require HRA.

## 5 Review of Habitats sites

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5.1.1 The following section provides a summary of the results of the review of Habitats sites data which will form the baseline for subsequent stages of HRA.

### 5.2 Habitats sites

5.2.1 It is necessary to consider all the Habitats sites that form part of the NSN (SACs, SPAs and proposed or candidate SPAs or SACs, expanded by the NPPF to include Ramsar sites) within a broad area or Zol of the Local Plan and the specific policies therein.

5.2.2 The Zol is defined by the potential effects arising from the project or plan and the available pathways for those effects to reach and impact the interest features of Habitats sites.

5.2.3 In order to identify all strategic corridors where potential direct, indirect and in-combination effects could reasonably be considered possible, a Zol buffer is set up around the primary activities, or in this case Policies, which are likely to affect the qualifying features of Habitats sites.

5.2.4 LBTH has provided an indicative list of site allocations and reasonable alternative to meet the housing needs of the Borough. These have been used as the primary basis on which to set up the Zol and assume:

- dispersal of development across the Borough as shown on Figure 1 (including both Proposed Allocations and Reasonable Alternatives); and
- delivery of at least 52,095 new homes across the borough between 2023 and 2038, which includes a proportion (34,730 homes) set by the London Plan (2021) as part of a ten-year housing target (for the period 2019/20 to 2028/29).

5.2.5 The Zol are set up to reflect the potential impact or effects pathways of the Qualifying features of the Habitats sites. A Zol of 7.2km has been applied around the Borough boundary to identify all habitats sites in proximity, and then refined to within 7.2km of allocated sites identified within the Local Plan. The premise of this approach is that 7.2km represents the average distance travelled for office use, as per the Air Quality Neutral Guidance<sup>19</sup> with specific reference to Inner London (for which LBTH falls within). Whilst average distance travelled is also provided for residential (3.4km) and retail (5.5km) use, the application of 7.2km (reflective of office use in Inner London) is considered equally suitably precautionary to identify potential impacts from other pressures or threats to Habitats sites, when considering Habitats sites for inclusion in Stage 1 Screening

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<sup>19</sup> Greater London Authority (2023) London Plan Guidance: Air Quality Neutral [online]. Available at: <https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Neutral%20LPG.pdf>

- 5.2.6 Consideration has been given to whether this Zol is inclusive of other LSE which may arise, including recreational pressure which may also cover an extensive area. Visitor surveys have shown that this recreational access Zol, when applied to visitor numbers at to the 75<sup>th</sup> percentile, extends to an approximate maximum 7km figure (depending on survey year and location)(Liley, D 2020) for sites considered in this assessment. The selected 7.2km Zol is therefore considered appropriately precautionary to support the Screening approach for the assessment overall.
- 5.2.7 For air quality considerations and traffic generation or re-distribution, the London Air Quality Neutral (AQN) Guidance<sup>20</sup> sets out recommended average journey lengths for key land uses based on their location within London. These are summarised in **Table 5-1** below.
- 5.2.8 For the most part, the applicable values for the LBTH will be those set for ‘Inner London’ and these values have been used to define the bespoke Zol for the site allocations, based on the proposed land uses / development descriptions. However, it is noted that a small part of Tower Hamlets (along the western-most edge) technically falls within the boundary of the Central Activity Zone (CAZ). There are two allocations that sit wholly within the CAZ (allocations 1.1 Bishopsgate Goods Yard and 1.5 London Metropolitan University). As such, the ‘CAZ’ values have been used to define the bespoke Zol for these sites. A third allocation (1.7 Brick Lane and Pedley Street) also straddles the boundary of the CAZ. However, as the majority of this site lies outside of the CAZ, the ‘Inner London’ values are considered most appropriate to the overall setting and have been used for the Zol.

**Table 5-1 – Average distance (km) travelled by car per trip**

Land Use	CAZ	Inner London	Outer London
Residential	4.2	3.4	11.4
Office	3.0	7.2	10.8
Retail	9.2	5.5	5.4

- 5.2.9 To ensure a conservative approach to the assessment, where a development is mixed-use, a precautionary approach has been applied whereby the worst-case (i.e. longest) average distance travelled has been applied (i.e. 7.2km for Inner London and 9.2km for the CAZ).
- 5.2.10 Three Habitats sites, as presented in Table 5-2, lie within this potential Zol for the LBTH Local Plan, including one SPA, one SAC and one Ramsar site.

<sup>20</sup> Mayor of London (February 2023) London Plan Guidance. Air Quality Neutral.

5.2.11 The reasons for designation of the screened-in Habitats sites and their known vulnerabilities are given in Appendix B, which has been collated from the Natura 2000 standard data forms and the Natural England Site Improvement Plans.

5.2.12 With regard to the qualifying features and information on vulnerability of the Habitats sites detailed in Appendix B, the broad conservation objectives for SACs and SPAs are to:

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:*

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species.*
- *The structure and function (including typical species) of qualifying natural habitats.*
- *The structure and function of the habitats of qualifying species.*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.*
- *The populations of qualifying species; and*
- *The distribution of qualifying species within the site.*

5.2.13 Specific conservation objectives for Ramsar sites are not currently available.

5.2.14 The Habitats sites which fall within the identified Zol of the LBTH boundary are listed in Table 5-2.

**Table 5-2 – Habitat sites falling within the 7.2km Zol of LBTH boundary**

Habitats sites (SPA and Ramsar)	Habitats sites (SAC)
Lee Valley	Epping Forest

5.2.15 The proposed site allocations and their distance in relation to each of the Habitats sites are given in Table 5-3.

**Table 5-3 - Proximity of proposed site allocations to Habitats sites identified within the 7.2km Zol**

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
1.1	Bishopsgate Goods Yard	Mixed-use, residential-led scheme (500 homes) with a mix of retail, workspace, community and cultural uses and the provision of a leisure facility and an Idea Store (c. 11,500sqm non-residential use).	CAZ	Yes (5.64 km)	No	9.2	Yes (8.3km)	No
1.2	London Dock	Mixed-use, residential-led scheme (1,800 homes) with a mix (21,500sqm) of retail, workspace, community and cultural uses and the provision of a secondary school.	Inner London	Yes (7.15 km)	No	7.2	No	N/A
1.3	Marian Place Hasworks and The Oval	Development should consist of a mixed-use, residential-led scheme (700 homes) with a mix (c.4,000sqm) of retail, workspace, community and cultural uses.	Inner London	Yes (4.35 km)	Yes (6.75 km)	7.2	Yes (6.75 km)	No
1.4	Whitechapel South	Mixed-use, residential-led scheme (837 homes, 425 student rooms) with a mix (c. 93,000sqm) of retail, workspace and community uses.	Inner London	Yes (5.97 km)	No	7.2	No	N/A
1.5	London Metropolitan University	Redevelopment of the university buildings to provide additional teaching space and student accommodation (520 student rooms and 33,500sqm of educational floorspace).	CAZ	Yes (6.47 km)	No	4.2	No	N/A
1.6	Whitechapel North	mixed-use, residential-led scheme (1,225 homes) with a mix of retail,	Inner London	Yes (5.72 km)	No	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		workspace and community uses (at least 4,500sqm).						
1.7	Brick Lane and Pedley Street	Mixed-use, residential-led scheme (800 homes) with a mix of retail, workspace and community uses (up to 35,000sqm non-residential floorspace).	Inner London	Yes (5.56 km)	No	7.2	No	N/A
2.1	Bow Common Lane	Mixed-use, residential-led scheme (1,000 homes) with a mix of retail, workspace, community and cultural uses and sixth form educational centre (2,500sqm non-residential use).	Inner London	Yes (6.1 km)	Yes (6.41 km)	7.2	Yes (6.4km)	No
2.2	Chrisp Street	Mixed-use scheme combining residential uses (650 homes) with an enhanced town centre combining retail, workspace, community and cultural uses (20,000sqm town centre and community use).	Inner London	Yes (7.16 km)	Yes (6.99 km)	5.5	No	N/A
3.1	Ailsa Street	Mixed-use, residential-led scheme (1,450 homes) with a mix of retail, workspace, community and cultural uses (6,500sqm non-residential use).	Inner London	Yes (6.85 km)	Yes (6.3 km)	5.5	No	N/A
3.2	Leven Road	Mixed-use, residential-led scheme (2,800 homes) with a mix of retail, workspace, community and cultural uses, and provision of a secondary school (8,500sqm commercial floorspace).	Inner London	Yes (7.18 km)	Yes (6.37 km)	5.5	No	N/A
3.3	Aberfeldy Estate	Mixed-use, residential-led scheme (1,550 homes) with a mix of retail,	Inner London	Yes (7.05 km)	Yes (6.51 km)	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		workspace, community and cultural uses, and provision of a primary school (3,500sqm)						
3.4	Bromley by Bow	Mixed-use, residential-led scheme (1,300 homes) with a mix of retail, workspace, community and cultural uses, and provision of a primary school, community centre (20,000sqm non-residential use), and improved connections across the River Lea	Inner London	Yes (5.68 km)	Yes (5.31 km)	5.5	No	N/A
3.5	Blackwall Trading Estate and Leamouth Road Depot	Mixed-use, residential- and light industrial-led scheme, with some potential for other commercial uses. (700 homes, 35,000sqm non-residential floorspace, 6,500sqm depot, if needed)	Inner London	No	Yes (6.48 km)	7.2	Yes (6.5km)	No
3.6	Hackney Wick Station	Mixed-use, employment-focused scheme with a mix of residential, retail, workspace, and creative and cultural uses (300 homes on TH site, 500 homes on LLDC site, 6,500sqm non-residential)	Inner London	Yes (3.83 km)	Yes (4.11 km)	7.2	Yes (4.1km)	Yes (5.5km)
3.7	Hepscott Road	Mixed-use, residential-led scheme (525 homes) with a mix of retail, workspace, and creative and cultural uses (11,000sqm commercial/community floorspace), and delivery of a linear park and crossings of the canal.	Inner London	Yes (4.1 km)	Yes (4.43 km)	7.2	Yes (4.4km)	Yes (6.0km)
3.8	Sweetwater	Mixed-use, residential-led scheme (775 homes) with a mix of retail, workspace, and community uses, and provision of a library, nursery, health care facility (4,500sqm commercial/community	Inner London	Yes (4.07 km)	Yes (4.05 km)	7.2	Yes (4.1km)	Yes (4.9km)

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		floorspace), and bridges across the canal.						
3.9	Teviot Estate	Mixed-use, residential-led scheme (1,200 homes) with a mix of retail, workspace, community and cultural uses, and provision of a primary school (5,000sqm commercial/community floorspace).	Inner London	Yes (6.63 km)	Yes (6.23 km)	5.5	No	N/A
4.1	Aspen Way	Mixed-use, residential-led scheme (1,900 homes) with a mix of retail, workspace, community and cultural uses and the reprovision of a college, community centre, football pitches, and transport depot (5,500sqm non-residential and 21,000sqm educational floorspace).	Inner London	No	No	5.5	No	N/A
4.2	Billingsgate Market	Mixed-use, residential-led scheme (1,600 homes) with a mix of retail, workspace, community and cultural uses and the provision of a secondary school and freight consolidation centre (62,000sqm educational use, 8,300sqm industrial use, 66,000sqm commercial use, and 20,000sqm retail floorspace).	Inner London	No	No	7.2	No	N/A
4.3	Crossharbour	Mixed-use, residential-led scheme (2,250 homes) with a mix of retail, workspace, community and cultural uses and the provision of a health centre, primary school and community centre (25,000sqm non-residential).	Inner London	No	No	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
4.4	Limeharbour	Mixed-use, residential-led scheme (1,850 homes) with some employment spaces (39,000sqm).	Inner London	No	No	7.2	No	N/A
4.5	Marsh Wall East	Mixed-use, residential-led scheme (2,400 homes) with some employment spaces, and provision of a primary school and a health facility (10,000sqm hotel, 3,300sqm educational use, 45,000sqm commercial, and 10,500sqm retail use).	Inner London	No	No	5.5	No	N/A
4.6	Marsh Wall West	Mixed-use, residential-led scheme with some employment spaces (2,625 homes, 1,000 student units, 800 co-living units, 1,175 hotel rooms and serviced apartments)	Inner London	No	No	3.4	No	N/A
4.7	Millharbour	Mixed-use, residential-led scheme (1,700 homes) with a mix of workspace and community uses, including provision of a primary and secondary school (6,000sqm non-residential use, 3,500sqm educational floorspace).	Inner London	No	No	5.5	No	N/A
4.8	North Quay	Mixed-use scheme with elements of residential (1,250 homes) and employment floorspace (160,000sqm).	Inner London	No	No	7.2	No	N/A
4.9	Reuters	Residential-led scheme (900 homes) with provision of a primary school (2,250sqm commercial use/public house).	Inner London	No	No	3.4	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
4.1	Riverside South	Mixed-use scheme with elements of residential (1,650 homes) and employment floorspace (56,000sqm).	Inner London	No	No	7.2	No	N/A
4.11	Westferry Printworks	Residential-led scheme with provision of a secondary school (950 homes, 14,500sqm educational use, 2,000sqm commercial use, 4,000sqm community use, 1,500sqm retail use).	Inner London	No	No	7.2	No	N/A
4.12	Wood Wharf	Mixed-use, residential-led scheme (3,600 homes) with a mix of retail, workspace, community and cultural uses and the provision of a primary school and health facility and an expansion of the Idea Store (165-265,000sqm commercial floorspace).	Inner London	No	No	7.2	No	N/A
4.13	10 Bank Street	Mixed-use, residential- and commercial-led scheme (575 homes, 41,000sqm commercial/town centre uses)	Inner London	No	No	7.2	No	N/A
4.14	Westferry and Park Place	Mixed-use, residential- and commercial-led scheme (550 homes, 19,000sqm commercial/town centre floorspace)	Inner London	No	No	7.2	No	N/A

## 5.3 Information relating potential effects on Habitats sites

- 5.3.1 Table 5-4 overleaf summarises pressures and threats listed on the Site Improvement Plans (SIPs) for SPAs and SACs that will need to be considered during screening and Appropriate Assessment (if required) of the Local Plan.

**Table 5-4 - Pressures and threats listed on Habitats sites SIPs<sup>21</sup>**

Impacts highlighted as red should be given primary consideration in screening and Appropriate Assessment of the Local Plan policies, and those highlighted green are less likely to be considerations in screening and Appropriate Assessment of the Local Plan (note that abbreviations are those pressures and threats listed in the Joint Nature Conservation Committee (JNCC) data sheet for the respective Habitats site).

Site Name	Air pollution: impact of atmospheric nitrogen deposition	Public access/ disturbance	Hydrological changes	Inappropriate scrub control	Inappropriate water levels	Water pollution	Inappropriate cutting/mowing	Invasive species	Changes in species distribution	Disease	Fisheries : Fish stocking	Undergrazing
Lee Valley SPA and Ramsar <sup>22</sup>	T	T	T	T		T	T	T			T	
Epping Forest SAC <sup>23</sup>	P	P			T	T		P/T	T	T		P

<sup>21</sup> P = Pressure, T = Threat

<sup>22</sup> Natural England (2014) *Site Improvement Plan: Lee Valley (SIP118)* [online]. Available from: <https://publications.naturalengland.org.uk/publication/5864999960444928>

<sup>23</sup> Natural England (2016) *Site Improvement Plan: Epping Forest (SIP076)* [online]. Available from: <https://publications.naturalengland.org.uk/publication/6663446854631424>

## 6 Approach to Stage 1 Screening

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### 6.1 Guidance

- 6.1.1 Government guidance and Court rulings have confirmed that the level of detail in the HRA of a plan, whilst meeting the relevant requirements of the Habitats Regulations, should be appropriate to the level (or tier) of plan or project that it addresses.
- 6.1.2 The guidance referred to in Section 2.5 has been referred to in undertaking the Stage 1 screening of the LBTH Local Plan policies. The approaches set out by the guidance have been interpreted to the level of detail available within the objectives, policies and description of projects based on the descriptions contained within the Local Plan, noting that at its current stage, the Plan is a high-level document. At a greater level of detail, and as normally required with specific project level HRAs for example, the HRA stages have more specific data requirements.

### 6.2 Air Quality Input

- 6.2.1 The sensitivity of Habitats sites to changes in air quality is fundamental to the Stage 1 screening of the LBTH Local Plan policies. The sensitivity of the identified Habitats sites has been informed by the review of identified pressures and threats (**Table 5-4**) and a review of the Air Pollution Information Service (APIS)<sup>24</sup>.
- 6.2.2 A detailed assessment of air quality / air pollution impact pathways has been provided in the associated *Air Quality Information Report to Support Habitats Regulations Assessment*, (WSP 2024) and should be read in conjunction with this report. Findings and conclusions are summarised here, where relevant.

### 6.3 In-Combination Assessment

- 6.3.1 It is a requirement of the Habitats Regulations to consider the effects of projects or plans “in combination” at the screening stage. Articles 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The ‘in-combination’ requirement is undertaken in order to make sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

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<sup>24</sup> Air Pollution Information Service. Available at [Air Pollution Information System | Air Pollution Information System \(apis.ac.uk\)](https://apis.ac.uk)

6.3.2 The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:

6.3.3 *“according to the wording of that provision [Article 6(3) of the Habitats Directive] an Appropriate Assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field. ....”*

6.3.4 Table 6-1 outlines the types of plans and projects that should be considered in an in-combination assessment:

**Table 6-1 - Types of plans and projects considered at “In-combination” assessment.**

<ul style="list-style-type: none"> <li>▪ The incomplete or non-implemented parts of plans or projects that have already commenced;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Plans or projects given consent or given effect but not yet started;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Plans or projects currently subject to an application for consent or proposed to be given effect;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Projects that are the subject of an outstanding appeal;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Ongoing plans or projects that are the subject of regular review;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Any draft plans being prepared by any public body;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Any proposed plans or projects published for consultation prior to application;</li> </ul>
<ul style="list-style-type: none"> <li>▪ Projects being proposed or being undertaken by a competent authority itself which require no external authorisation.</li> </ul>

6.3.5 With reference to Section 2.3, case law and methodology relating to HRA has changed rapidly over recent years. One of the most notable changes as a result of CJEU rulings has been the clarification that mitigation measures cannot be included in HRA Stage 1 (Screening). As this was previously a common practice, many HRAs will have concluded no LSE on Habitats sites, based on the likely effectiveness of mitigation measures. The outcome of this is that preceding plan-level HRAs can be unreliable in terms of adopted conclusions of ‘no LSE’.

6.3.6 Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach has been adopted when considering the HRA conclusions of overlapping plans and projects in-combination.

## 7 HRA Stage 1 Screening of the Local Plan Policies

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- 7.1.1 The pressures and threats set out in Table 5-3 have been reviewed for those likely to arise from the policies within the Local Plan and in particular the proposed delivery of dwellings within the Borough. Those considered relevant to this type and scale of development have been identified as:
- air pollution: impact of atmospheric nitrogen deposition;
  - public access/ disturbance/ recreational pressures; and
  - hydrological changes
- 7.1.2 The pressures and threats set out in Table 5-3 which are considered at this early stage to be unlikely to arise from the policies as presented and the draft development allocations (except where this directly results secondarily from the pressures and threats included above) and are not considered further in this screening exercise, are: inappropriate water levels; inappropriate scrub control; water pollution; inappropriate cutting / mowing; invasive species; changes in species distribution; disease; fisheries: fish stocking and undergrazing.
- 7.1.3 Further information relating to those pressures and threats identified as relevant to the LBTH Local Plan and the development allocation targets are also presented below.

### 7.2 Potential Air Quality Effects

- 7.2.1 Consideration has been given to the potential effect of changes in air quality within the identified Habitats sites, where they fall within the specified Zol, with a particular focus on qualifying features, including:
- changes in NO<sub>x</sub> and NH<sub>3</sub> concentrations in relation to the Critical Levels for these pollutants; and
  - Changes in N deposition in relation to the relevant Critical Loads.

#### Critical Levels for NO<sub>x</sub> and NH<sub>3</sub>

- 7.2.2 Critical Levels are used to estimate the exposure of sensitive vegetation and ecosystems to some important airborne pollutants, below which significant harmful effects are not expected to occur. These levels have been adopted by the European Union and the United Nations Economic Commissions for Europe (UNECE) and are used as regulatory standards and are expressed in units of µg/m<sup>3</sup> (micrograms per cubic metre).
- 7.2.3 Critical Levels are not habitat specific, as with Critical Loads (see below), but have been set to cover broad vegetation types. For NO<sub>x</sub> concentrations, there are Critical Levels given for both annual and 24 hour mean concentrations, irrespective of habitat type. For NH<sub>3</sub>, there are two values relevant to annual mean concentrations, one (1 µg/m<sup>3</sup>) where lichens and bryophytes are present (and form a key part of the ecosystem integrity), which are

particularly sensitive to changes in NH<sub>3</sub>, and another (3µg/m<sup>3</sup> with an uncertainty range of 2 – 4µg/m<sup>3</sup>) for all remaining vegetation.

7.2.4 The relevant Critical Levels for NO<sub>x</sub> and NH<sub>3</sub> relating to the protection of vegetation and ecosystems are summarised in Table 7-1.

**Table 7-1 - Relevant NO<sub>x</sub> and NH<sub>3</sub> Critical Levels for the Protection of Vegetation and Ecosystems**

Pollutant		Concentration (µg/m <sup>3</sup> )	Averaging Period
Nitrogen oxides (NO <sub>x</sub> )		30	Annual Mean
		75	24-hours
Ammonia (NH <sub>3</sub> )	Where lichens and bryophytes are present (and form a key part of the ecosystem integrity)	1	Annual Mean
	All other vegetation	3 (with uncertainty of 2-4)	Annual Mean

**CRITICAL LOADS**

7.2.5 In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, N deposition can be of concern for sensitive ecological sites as it can result in a variety of adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

7.2.6 In the UK, Critical Loads have been established for a wide range of habitat and vegetation types, reflecting the variation in ecosystem responses to N deposition. Details of the Critical Loads relevant to a specific habitat or designated site are

available from the Air Pollution Information Systems (APIS) website<sup>25</sup>. In relation to Critical Loads, N Dep is expressed in units of kilograms of nitrogen per hectare per year (Kg N/ha/yr).

- 7.2.7 A summary of the relevant Critical Loads for the identified Habitats sites is provided in Appendix C for both SPAs and SACs.

### **BASELINE CONDITIONS AT SITES WHERE AIR POLLUTION IS IDENTIFIED AS A PRESSURE AND/OR THREAT**

- 7.2.8 Lee Valley SPA & Ramsar are a Habitats site where air pollution is cited as an identified threat. While for Epping Forest, air pollution is identified to present a pressure to the Habitat site, as per **Table 5-4**.

#### **NO<sub>x</sub> Concentrations**

- 7.2.9 Background annual mean NO<sub>x</sub> values for Epping Forest SAC and Lee Valley SPA & Ramsar site have been taken from the national maps provided by the Department for Environment Food and Rural Affairs (Defra)<sup>26</sup>, where background concentrations of NO<sub>x</sub> have been mapped at a grid resolution of 1x1km for the whole of the UK, and are provided in Table D-1 in Appendix D.
- 7.2.10 The Critical Level is predicted to be met at background locations across the vast majority of Lee Valley SPA & Ramsar with total NO<sub>x</sub> concentrations ranging from a minimum of 11.9µg/m<sup>3</sup> to a maximum of 30.6µg/m<sup>3</sup>. Background NO<sub>x</sub> concentrations are predicted to exceed the Critical Level in the 1x1km grid square covering the part of the Lee Valley SPA and Ramsar Site where it meets the heavily trafficked A503 (Forest Road).
- 7.2.11 The Critical Level is predicted to be met at background locations across the majority of Epping Forest SAC with total NO<sub>x</sub> concentrations ranging from a minimum of 15.0µg/m<sup>3</sup> to a maximum of 35.7µg/m<sup>3</sup>. Background concentrations are predicted to exceed the Critical Level in parts of the SAC, near the heavily trafficked A406 (North Circular Road) and the A104 and A114 (Whipps Cross Road).
- 7.2.12 It should be noted that background concentrations are representative of concentrations that can be experienced away from a pollution source. Therefore, within increasing proximity to a pollution source, such a busy road, annual mean NO<sub>x</sub> concentrations will increase such that there could be the potential for exceedances of the Critical Level for this pollutant at locations within the Lee Valley SPA & Ramsar

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<sup>25</sup> <http://www.apis.ac.uk/>

<sup>26</sup> Defra (2022) *Background Mapping data for local authorities – 2018* [online]. Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>

Site and Epping Forest SAC that are near to the road edge, and the use of background annual mean NO<sub>x</sub> concentrations in the screening process should be treated with caution.

### NH<sub>3</sub> Concentrations

- 7.2.13 From an initial review of the data provided in Appendix C for the Lee Valley SPA & Ramsar, the relevant Critical Level for NH<sub>3</sub> in relation to habitats supporting *Anas clypeata*, *Anas strepera*, and *Botarus stellaris* is 3µg/m<sup>3</sup>. Baseline concentrations of annual mean NH<sub>3</sub> within Lee Valley SPA and Ramsar indicate that the relevant Critical Level is currently being met.
- 7.2.14 The initial review of data provided in Appendix C also indicates that baseline concentrations of annual mean NH<sub>3</sub> within Epping Forest SAC are above the relevant Critical Levels listed for the following habitat types:
- European Dry Heaths where both the minimum and maximum value indicate the potential for exceedances of the Critical Level of 1µg/m<sup>3</sup>; and
  - Northern Atlantic wet heaths with *Erica tetralix* where the maximum and minimum values all indicate exceedances of the Critical Level of 1µg/m<sup>3</sup>.
- 7.2.15 For Atlantic acidophilous beech forests, the relevant Critical Level for NH<sub>3</sub> is 1 or 3µg/m<sup>3</sup>, depending on whether lichens or bryophytes are present. The minimum and maximum baseline concentrations of annual mean NH<sub>3</sub> indicate that a Critical Level of 1µg/m<sup>3</sup> is being exceeded but a Critical level of 3µg/m<sup>3</sup> is being met. Therefore, there is a risk of exceeding the Critical Level where lichens or bryophytes are present.
- 7.2.16 The relevant Critical Level for NH<sub>3</sub> for both *Lucanus cervus* (Stag beetle) and *Triturus cristatus* is 3µg/m<sup>3</sup> which is relevant to the habitat which supports these species. Baseline concentrations of annual mean NH<sub>3</sub> within Epping Forest SAC indicate that the relevant Critical Level for both *Lucanus cervus* and *Triturus cristatus* is currently being met.
- 7.2.17 Based on the above and with reference to LBTH Local Plan policies targeting new development which could give rise to additional traffic and/or traffic re-distribution:
- Effects on Lee Valley SPA and Ramsar from NH<sub>3</sub> are not anticipated due to the relevant Critical Levels for NH<sub>3</sub> being met within this Habitats site.
  - The potential for effects on Epping Forest SAC due to increased NH<sub>3</sub> as a result of the emerging LP cannot be discounted due to some identified exceedances of the Critical

Level, particularly where lichens and bryophytes may be present. This also takes into account that background concentrations of NH<sub>3</sub> are forecast to increase year on year<sup>27</sup>.

## N Deposition

7.2.18 The N Dep values presented in Appendix C indicate that:

- For Lee Valley SPA, only *Botaurus stellaris* (Bittern) has an established Critical Load for N Dep. The lower Critical Load for rich fens (the relevant habitat supporting the species) of 5 kg/N/ha/year is being exceeded across the SPA, whereas the upper Critical Load of 25 kg/N/ha/year is being met throughout the site.
- For Epping Forest SAC, both the upper and lower Critical Load values are exceeded for all habitats identified (wet heath and European dry heaths, which have a Critical Load range of 5 – 15 kg/N/ha/year, and Atlantic acidophilous beech forests, which have a Critical Load range of 10 –15 kg/N/ha/year). In addition, both the lower and upper Critical Load values for broadleaved deciduous woodland, the supporting habitat for *Lucanus cervus* (Stag beetle), are exceeded within the Epping Forest SAC.

7.2.19 This is not to say that all these areas will be significantly impacted by LBTH Local Plan but it does highlight areas that will be particularly sensitive to any changes in air quality as a result of the LBTH Local Plan.

## Public Access / Disturbance

7.2.20 As part of the screening exercise, consideration has also been given to the sensitivities of the Habitats sites to public access and disturbance. Development in proximity to these sites can lead to an increase in visits to the sites, with the result that additional pressures can arise including increased incidence of fire, disturbance to roosting, feeding and breeding birds, trampling and increased predation rates in heathland environments<sup>28</sup>.

7.2.21 The Habitats sites identified in this screening include those designated for habitats, specifically heathland and woodland, those designated for wetland bird species, and sites designated for invertebrate interest. The habitats or qualifying features of the Habitats sites are therefore vulnerable to additional pressures from public access or disturbance through different mechanisms.

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<sup>27</sup> <https://data.jncc.gov.uk/data/04f4896c-7391-47c3-ba02-8278925a99c5/JNCC-Report-665-FINAL-WEB.pdf>

<sup>28</sup> Underhill-Day, 2005 *A literature review of urban effects on lowland heaths and their wildlife* English Nature Report 623

- 7.2.22 The location of the identified Habitats sites in South East England places them in a location of acute pressure from high population density and predicted growth, with the corresponding identified trend to visit these sites more<sup>29</sup>.

### Hydrological Changes

- 7.2.23 Consideration has also been given to hydrological changes in relation to Lee Valley SPA and Ramsar that may arise as a result of the new Local Plan. This is as a result of development supported by the new Local Plan likely to result in an increased demand for water which could indirectly impact upon Habitat Sites.
- 7.2.24 Lee Valley SPA and Ramsar is water resource sensitive and part of it (Walthamstow reservoirs) form part of the public water supply (PWS) system in London and therefore an increase in water demand e.g via abstraction etc. as a result of the predicted growth arising from LBTH Local Plan may result in hydrological changes to this Habitat Site.
- 7.2.25 The site features for Epping Forest are not considered to be 'water resource sensitive' with hydrological changes not listed as a pressure or threat for this SAC. Therefore, Epping Forest will not be vulnerable to changes in abstraction that may be associated with the growth supported by the new Local Plan. As such, Epping Forest will not be considered further within this screening exercise with regards to hydrological changes.

### Consultation With Natural England

- 7.2.26 As part of the Integrated Impact Assessment (IIA) - Scoping Report for LBTH Local Plan, Natural England were consulted in May 2023. A response from Natural England received in July 2023 stated the following:

*'Natural England have no comments to make on this consultation'. 'Once further work develops on which sites will be taken forward for allocation please consult Natural England so we can offer advice on their suitability with regard to impacts on and opportunities for the natural environment.'*

- 7.2.27 It is considered that consultation will be undertaken following the submission of the HRA Screening document.

### Summary of Discussion on Pressures and Threats

- 7.2.28 The screening exercise has considered the high-level pressures and threats to each site associated with public access and disturbance based on published research and

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<sup>29</sup> Lake, S.; Liley, D.; Saunders, P. 2020 *Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches*. Unpublished report by Footprint Ecology

reports for individual sites and the effects of access generally on habitats and species.

**Table 7-2 - Discussion of Identified Pressures and Threats**

Pressure/threat	Habitats sites concerned	Discussion
<p><b>Air pollution: impact of atmospheric nitrogen deposition</b></p>	<p>Lee Valley SPA &amp; Ramsar</p>	<p>Seventeen of the allocated sites fall within the (non-refined) 7.2km Zol of the Habitats Site. The closest site is approximately 3.8km (as the crow flies) from Lee Valley SPA &amp; Ramsar.</p> <p>The SIP states:</p> <p><i>Nitrogen deposition exceeds site relevant critical loads.</i></p> <p>Data from Defra and APIS confirms the potential for exceedances of both the Critical Level and Critical Loads for NO<sub>x</sub> concentrations and N deposition, respectively.</p>
	<p>Epping Forest SAC</p>	<p>Twelve of the allocated sites fall within the (non-refined) 7.2km Zol of the Habitats site. Notably, the closest site is approximately 4.2km (as the crow flies) from Epping Forest SAC.</p> <p>The SIP states:</p> <p><i>Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.</i></p> <p>Data from Defra and APIS confirms the potential for exceedances of both the Critical Level and Critical Loads for NO<sub>x</sub> concentrations and N deposition, respectively.</p> <p>Similarly, there is the potential for Critical Levels for NH<sub>3</sub> to be exceeded for Northern Atlantic wet heaths, European dry heaths, and Atlantic acidophilous beech forests (where lichens and bryophytes are present).</p>

Pressure/threat	Habitats sites concerned	Discussion
<b>Public access/ disturbance</b>	Lee Valley SPA & Ramsar	<p>There are 17 Proposed Allocations that fall within the 7.2km Zol. The closest of which is Hackey Wick Station approximately 3.83km to Lee Valley SPA and Ramsar.</p> <p>Public access and disturbance are listed as a threat on the designated site, specifically with regards to populations of Bittern, Gadwall and Shoveler. The SIP states: <i>'Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly'</i></p> <p>The proposed measures in the SIP to address this is:</p> <ul style="list-style-type: none"> <li>- <i>Investigate whether there is a need for change to access management; and</i></li> <li>- <i>Agree appropriate management measures with stakeholders to align with best practice.</i></li> </ul>
	Epping Forest SAC	<p>Natural England has issued Overarching Standard Advice for Development Applications within Epping Forest District<sup>30</sup>.</p> <p>The guidance sets out the following with regards to recreational disturbance: <i>As part of the work required to produce a mitigation strategy for recreational pressure, Footprint Ecology have undertaken visitor surveys to identify a recreational Zol and to identify the distance the majority of visitors will travel to visit Epping Forest SAC. The 2017 report</i></p>

<sup>30</sup> [Overarching standard advice for development applications within Epping Forest District \(eppingforestdc.gov.uk\)](http://eppingforestdc.gov.uk)

Pressure/threat	Habitats sites concerned	Discussion
		<p><i>identified that 75% of visitors travelled up to 6.2Km to the SAC and this distance has been used in the interim period as the Zol. Following further survey work carried out in Autumn 2019 Natural England advised that it was appropriate to continue using the distance of 6.2km provided that the intention was to carry out further survey work in June 2021.</i></p> <p><i>It is Natural England’s understanding that no further survey work has been undertaken. It is also unclear, if it were to be undertaken, how representative data collected would be given the impact of the coronavirus (COVID-19) on national/international travel and recreational habits. We therefore advise that, in the absence of further evidence, it remains appropriate to continue to use 6.2km as the Zol for Epping Forest SAC at this time, although support the view that further summer surveys should be undertaken as soon as is reasonably practicable. Larger developments on the periphery of this 6.2km zone will need to consider the implications of the best and most recent available evidence, the need for further survey data and any potential recreational impacts in their HRAs.</i></p> <p>However, in relation to the above, it should be noted that this advice is in relation to Epping Forest District which is considered to fall within Outer London, whilst Tower Hamlets is considered to be Inner London, and as such, the distance travelled is likely to vary, with shorter trip lengths for Inner London boroughs.</p> <p>Twelve Proposed Allocations fall within the 7.2km Zol, with Sweetwater the closest Proposed Allocation, located approximately 4.07km away.</p>

Pressure/threat	Habitats sites concerned	Discussion
		<p>Public access and disturbance are listed as both pressures and threats on the designated site and specifically the following habitat features: H4010 Wet heathland with cross-leaved heath, H4030 European dry heaths, H9120 Beech forests on acid soils. The SIP states:</p> <p><i>‘Epping Forest is subject to high recreational pressure. There is a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. Population and visitor numbers are likely to continue to increase.’</i></p> <p>The proposed measures in the SIP to address this is:</p> <ul style="list-style-type: none"> <li>- Identify key areas that are subject to recreational impacts; and</li> <li>- Agree and implement a site-specific recreational management plan to ensure SAC features are protected and maintained.</li> </ul>
<p><b>Hydrological changes</b></p>	<p>Lee Valley SPA &amp; Ramsar</p>	<p>As a result of the predicted growth in LBTH resulting from the Local Plan, there is the risk of hydrological changes to Lee Valley SPA and Ramsar.</p> <p>Hydrological changes are listed as a threat on the designated site, specifically with regards to populations of bittern, gadwall and shoveler. The SIP states:</p> <p><i>‘Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.’</i></p> <p>The proposed measures in the SIP to address this is:</p>

Pressure/threat	Habitats sites concerned	Discussion
		<ul style="list-style-type: none"> <li>- <i>Define more clearly the water level requirements for the habitats supporting the SPA bird features; and</i></li> <li>- <i>As a follow up to the above, agree the necessary water level management with key stakeholders for significant water bodies.'</i></li> </ul>

7.2.29 Table 7-3 sets out the findings of the Stage 1 Screening exercise and identifies where the potential for LSE arises.

**Table 7-3 - Screening**

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
<b><i>Delivering on the Local Plan</i></b>						
DV1	<i>Areas of growth and opportunity within Tower Hamlets</i>	This policy sets out the spatial strategy for growth and development within the borough for the life of the plan and sets out the proposed site allocations and growth areas.	All Habitats Sites	This policy is to ensure the local plan policies are effective by following a framework that has been prepared to set out the key performance indicators that will help track the delivery and performance of the Local Plan.	No LSE therefore no in-combination effect.	Screened out
DV2	<i>Delivering sustainable growth in Tower Hamlets</i>	This policy seeks to ensure development is sustainable and accessible, creates healthy environments, promotes environmental improvements and contributes towards a cleaner and greener future (i.e. through zero carbon developments, circular economy principles, low carbon energy, sustainable travel, mitigating impacts of poor air quality).	All Habitats Sites	This is a positive policy that seeks to promote sustainable development. It is compatible with the aims of conserving the integrity of Habitats sites by helping to ensure the delivery of sustainable development.	No LSE therefore no in-combination effect.	Screened out
DV3	<i>Healthy communities</i>	This policy sets out a requirement for development to contribute to a healthy built environment and promote active travel to encourage positive health and well-being. It also requires major development to complete	All Habitats Sites	A positive policy that seeks to improve human health benefits within the borough as a result of development.	No LSE therefore no in-combination effect.	Screened out

<sup>31</sup> Where there is an identified pressure or threat.

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		Health Impact Assessments as part of planning applications.				
DV4	<i>Planning and construction of new development</i>	This policy aims to minimise the impact of development on the local environment and existing communities. It sets out requirements for developers to employ sustainable construction methods and for major development to sign up to the Code of Construction Practice and proposed measures to mitigate potential impacts.	All Habitats Sites	This is a broad policy that relates to development within LBTH. Whilst it is noted that development has potential to impact upon Habitats sites (atmospheric pollution, increased visitor pressures and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out
DV5	<i>Developer contributions</i>	This policy establishes the requirements for financial contributions from developers to fund improvements to infrastructure and the environment.	All Habitats Sites	This policy is associated with securing developer contributions on infrastructure delivery within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
DV6	<i>Social value</i>	This policy sets out the council's intentions to maximise delivery of social value through development. Requires major development to submit a social value strategy.	All Habitats Sites	A positive policy that seeks to promote economic wellbeing, improve social progress and protect and enhance the natural and built environment in the borough as a result of development.	No LSE therefore no in-combination effect.	Screened out
DV7	<i>Utilities and digital connectivity</i>	The policy aims to ensure development is supported by appropriate utilities and has access clean heat and energy and quality internet/mobile connectivity.	All Habitats Sites	This policy relates to provision of utilities and broadband access. No effect pathways.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
DV8	Site allocations	This policy sets out some requirements for all proposed site allocations (as included in section 4 of the Local Plan), including delivering required infrastructure, provision of publicly accessible open space, social infrastructure, buffer spaces for watercourse etc.	All Habitats Sites	This policy sets out the specific development requirements for the proposed site allocations rather than its locational distribution. It does contain measures that could be positive for Habitats sites such as public open space provision and CIL.	No LSE therefore no in-combination effect.	Screened out
<b>Homes for our Community</b>						
HF1	Meeting housing needs	This policy sets out the strategic housing targets to ensure Tower Hamlets housing need are met. Policy supports new housing on windfalls sites.	All Habitats Sites	<p>The quantum of development across the Borough where known, is set out in the Proposed Allocations and Reasonable Alternatives identified, the closest of which 3.78km from the nearest screened in Habitats site (Figure 1).</p> <p>Any development within LBTH's administrative area that falls within the indicative 7.2km ZOI has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites, and hydrological changes via increased abstraction (Lee Valley SPA and Ramsar only). This policy could result in development in proximity to Habitats sites which could lead to LSE.</p>	<p>Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects.</p> <p>Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes, and increased abstraction may result in hydrological changes.</p>	Screened in

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
HF2	<i>Affordable housing and housing mix</i>	This policy establishes a target of 50% of new homes to be affordable.	All Habitats Sites	This is a development management policy and a framework to guide the affordable housing requirement in LBTH. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF3	<i>Protection of existing housing</i>	This policy aims to protect existing housing and to safeguard supply of self-contained homes.	All Habitats Sites	This is a development management policy and a framework to guide the protection of existing housing in LBTH. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF4	<i>Supported and specialist housing</i>	This policy seeks to ensure adequate supply of specialist housing.	All Habitats Sites	This is a development management policy to guide LBTH when providing for specialist and supported living housing as well as housing for older people. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF5	<i>Gypsy and traveller accommodation</i>	The policy provides a site for Gypsy and Traveller accommodation and establishes criteria that allows for the consideration of additional accommodation should a need be identified.	All Habitats Sites	This is a development management policy to guide LBTH when providing for Gypsy and Traveller needs. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF6	<i>Purpose-built student accommodation</i>	This policy sets out strict criteria to manage purpose-built student accommodation, so as not to compromise the ability to meet other needs. It	All Habitats Sites	This is a development management policy to guide LBTH on the student accommodation needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		requires 50% to be affordable accommodation.				
HF7	<i>Large-scale purpose-built shared living</i>	This policy set out criteria for purpose built shared accommodation and a target for 50% to be affordable.	All Habitats Sites	This is a development management policy to guide LBTH on the shared living housing needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF8	<i>Housing with shared facilities (houses in multiple occupation)</i>	This policy sets out criteria for houses with multiple occupations and aims to ensure they contribute to maintaining mixed and inclusive communities.	All Habitats Sites	This is a development management policy to guide LBTH on the shared living housing needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF9	<i>Housing standards and quality</i>	This policy aims to ensure housing meets the appropriate design, space, and amenity standards.	All Habitats Sites	This is a development management policy to guide LBTH on ensuring the housing standards and quality are met. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
<b>Clean and Green Future</b>						
CG1	<i>Mitigating and adapting to a changing climate</i>	This policy supports the Council's commitment to becoming net zero carbon by 2045 and sets out expectations for developments to help reduce the impacts of climate change, for example by reducing carbon emissions, mitigating against flooding and overheating, mitigating and improving air quality.	All Habitats Sites	A positive policy addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a low and net zero carbon future. Policy also looks to reduce exposure to poor air quality and contribute towards the measures outlined within Tower Hamlets Air Quality Action Plan. Therefore, policy likely to be of benefit to the Habitats sites if this includes the provision of more sustainable transport	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
				methods by reducing the need for private car use.		
CG2	<i>Low energy buildings</i>	The policy aims to ensure development within Tower Hamlets are designed and constructed to be Net Zero Carbon in operation and heat/energy efficient.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
CG3	<i>Low carbon energy and heating</i>	The policy requires development to use low carbon heating and clean energy supply.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development and reliance of fossil fuels as a heat source.	No LSE therefore no in-combination effect.	Screened out
CG4	<i>Embodied carbon, retrofit and the circular economy</i>	The policy establishes that development must consider Embodied Carbon across its lifetime and utilise Modern Methods of Construction. Retrofit and refurbishment is prioritised over demolition and new construction.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
CG5	<i>Overheating</i>	The policy requires development to ensure they are designed to avoid overheating and excessive heat generation.	All Habitats Sites	This is a positive policy by helping to reduce overheating, therefore helping to address the climate emergency.	No LSE therefore no in-combination effect.	Screened out
CG6	<i>Managing flood risk</i>	The policy sets design requirements and criteria to ensure development does not increase flooding and itself is resilient to flooding.	All Habitats Sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out
CG7	<i>Sustainable drainage</i>	The policy ensures development to manage its effects on the water environment and reduce	All Habitats Sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		the risk of surface water flooding.				
CG8	<i>Water efficient design</i>	This policy aims to reduce pressure on fresh water and waste water systems.	All Habitats Sites	This is a positive policy that seeks to reduce water usage in the Borough.	No LSE therefore no in-combination effect.	Screened out
CG9	<i>Air quality</i>	This policy requires all development to mitigate against poor air quality and contribute to improvements in air quality within Tower Hamlets. Development should be at least air quality neutral, with major proposals and those within Focus Areas should be air quality positive.	All Habitats Sites	This is a positive policy that is to drive significantly improved environmental conditions with regards to air quality in the LBTH area.	No LSE therefore no in-combination effect.	Screened out
CG10	<i>Noise and vibration</i>	Policy sets design requirements for development to manage noise and vibration from proposed development and existing sources.	All Habitats Sites	This is a positive policy that seeks to reduce noise and vibration as a result of new development in the Borough.	No LSE therefore no in-combination effect.	Screened out
CG11	<i>Contaminated land</i>	The policy seeks to protect the health of Towers Hamlets residents and the environment from the impacts of past and present land uses.	All Habitats Sites	This is a positive policy that will help to protect waterbodies within the Borough from contamination.	No LSE therefore no in-combination effect.	Screened out
<b><i>People, Places and Spaces</i></b>						
PS1	<i>Design-and infrastructure-led approach to development</i>	This policy aims to ensure that new development is well-designed and proposes sustainable capacities and densities. It incorporates the requirements of the new London Plan for all sites to	All Habitats Sites	This policy provides positive provision and is a key aspect of sustainable development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		optimise their capacity through a design-led process.				
PS2	<i>Tall buildings</i>	This policy seeks to guide and manage the location, scale and development of tall buildings in the Borough in line with the London Local Plan.	All Habitats Sites	This is a development management policy relating to tall buildings which protects local views and landmarks. No effect pathways are identified as present due to no sites designated for birds or similarly-sensitive qualifying features being present within the Borough boundary or immediate surrounds	No LSE therefore no in-combination effect.	Screened out
PS3	<i>Securing design quality</i>	The policy sets out the general design criteria for new developments to be assessed against. It outlines the key elements of high-quality design so that new development creates buildings, spaces and places that are sustainable, accessible attractive, durable, and well-integrated into their surroundings and responsive to the character of the area, thus contributing to a better quality of life.	All Habitats Sites	This policy provides positive provision and is a key aspect of sustainable development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS4	<i>Attractive streets, spaces and public realm</i>	This policy aims to deliver an attractive, accessible and well-designed network of streets and spaces which promote social interaction and inclusion, which people of all ages and abilities can value and enjoy, and where they feel safe and comfortable.	All Habitats Sites	This is a positive policy that seeks to promote the use of amenity and public realm spaces within the Borough, therefore potentially diverting pressure away from the Habitats Sites.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
PS5	<i>Creating inclusive places</i>	This policy encourages all new development to consider inclusive design as part of the developmental process.	All Habitats Sites	A development management policy relating to consideration for gender inclusive design within the borough.	No LSE therefore no in-combination effect.	Screened out
PS6	<i>Heritage and the historic environment</i>	This policy aims to protect the borough's heritage and character, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic to ensure that its distinctive character is maintained.	All Habitats Sites	A development management policy relating to conserving Heritage assets. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS7	<i>World heritage sites</i>	This policy aims to protect the borough's heritage and character, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic to ensure that its distinctive character is maintained.	All Habitats Sites	A development management policy relating to conserving World Heritage sites. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS8	<i>Shaping and managing views</i>	This policy aims to ensure that important views within, into, and across the borough are preserved through appropriate management of development.	All Habitats Sites	This policy is in relation to protecting designated views. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS9	<i>Shopfronts</i>	This policy seeks to ensure that shopfronts are attractive, well designed	All Habitats Sites	This policy provides the principles for the aesthetics associated with retail	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		and make a positive contribution to the surrounding streets, spaces and public realm and thereby enhance the overall character and appearance of the borough.		development within town centres. No effect pathways present.		
PS10	<i>Advertisements, hoardings and signage</i>	This policy aims to ensure advertisements, hoardings and signage positively activate the streetscape and enhance the visual appearance of their host buildings or structures.	All Habitats Sites	This policy provides the principles for the aesthetics associated with advertising within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS11	<i>Siting and design of telecommunications infrastructure</i>	This policy aims to ensure that the design and location of telecommunications equipment does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.	All Habitats Sites	A development management policy relating to consideration for the positioning of telecommunications equipment within the borough.	No LSE therefore no in-combination effect.	Screened out
<b><i>Employments and economic growth</i></b>						
EG1	<i>Creating investment and jobs</i>	This policy sets out the approach to employment provision in relation to the level and distribution of jobs across the borough over the period to 2038 ensuring successful and sustainable local and sub-regional economies whilst promoting and facilitating a range of employment spaces.	All Habitats Sites	This is a broad policy that relates to LBTH's economy. Whilst it is noted that economic growth has potential to impact upon Habitats sites (atmospheric pollution and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
EG2	<i>New employment space</i>	This policy supports Development proposals for new or intensified employment floorspace within designated employment locations / identified site allocations and at other locations where viability is demonstrated.	All Habitats Sites	<p>This policy provides the development principles for new employment floorspace within identified site allocations or designated employment locations.</p> <p>Any development within LBTH's administrative area that falls within the indicative 7.2km ZOI has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites, and hydrological changes via water resource conflicts (Lee Valley SPA and Ramsar only).</p>	<p>Any increase in traffic due to development has the potential to result in LSE due to changes in air quality, both due to the LBTH Local Plan 'alone' and 'in-combination' with other plans and projects.</p> <p>Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes, and water resource conflicts may result in hydrological changes.</p>	Screened in
EG3	<i>Affordable workspace</i>	LBTH's Employment Land Review (2023) and Affordable Workspace Study (2023) identify a gap in the affordability of commercial space within the borough for many types of businesses. This policy supports the provision for affordable workspace within the borough.	All Habitats Sites	A development management policy relating to ensuring that new development of commercial space provides a proportion of affordable workspace.	No LSE therefore no in-combination effect.	Screened out
EG4	<i>Loss and redevelopment of employment space</i>	This policy describes the criteria that will be used to assess the potential loss of employment space within the borough in line with the vision and objectives of the plan. To ensure the supply of employment land to meet identified demand is maintained, proposals	All Habitats Sites	A development management policy relating to protecting the loss of employment space within the Borough.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		which result in the loss of employment floorspace in certain areas will not be supported.				
EG5	<i>Railway Arches</i>	This policy supports development proposals involving railway arches, subject to a set criteria, to preserve industrial spaces outside of the SIL and LSIS designations.	All Habitats Sites	A development management policy relating to development within railway arches.	No LSE therefore no in-combination effect.	Screened out
EG6	<i>Data centres</i>	This policy sets out requirements to support development of data centres in Local Industrial Locations and Local Mixed Employment Locations.	All Habitats Sites	A development management policy relating to location and form of data centres in local industrial locations and employment locations. It does not specify quantum of development.	No LSE therefore no in-combination effect.	Screened out
<b>Town Centres</b>						
TC1	<i>Supporting the network and hierarchy of centres</i>	This policy defines the network of centres across the borough and describes the role and function of each centre and how they will continue to serve the needs of the borough and the wider area.	All Habitats Sites	This policy sets out the principles of development within town centre locations. It does not identify any specific location or quantum of development.  It can be considered that at the Local Plan level there are no effect pathways present	No LSE therefore no in-combination effect.	Screened out
TC2	<i>Protecting the diversity, vitality and viability of town centres</i>	This policy is in relation to development proposals which are expected to support the retail function of Primary and Secondary Shopping Frontages and the Redchurch Street and Columbia Road Specialist Centres, prioritising Class	All Habitats Sites	This policy seeks to protect the retail function of town centres. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		E(a) retail uses in these locations.				
TC3	<i>Town centre uses outside our town centres</i>	New retail development will be directed towards existing centres in accordance with the sequential approach set out in the NPPF which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, this policy recognises that demand for retail also exists in locations outside of Metropolitan, District and Neighbourhood Centres to meet the immediate convenience needs of local people and/or support the function of designated employment locations.	All Habitats Sites	Isolated retail units, e.g. convenience stores, are unlikely to impact on Habitats sites and will largely be within already built up areas. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC4	<i>Markets</i>	This policy advises that development proposals must support the protection, retention and enhancement of existing markets.	All Habitats Sites	This policy seeks to protect existing markets within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC5	<i>Food and drink</i>	This policy recognises that food and drink businesses play an important role in town centres and therefore development proposals relating to food and drink establishments will be supported subject to a set criteria.	All Habitats Sites	This policy seeks to support food and drink establishments within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

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TC6	<i>Entertainment uses</i>	This policy recognises that concentrations of betting shops, casinos and other gambling establishments present a high level of risk to those with gambling addictions or those susceptible to addiction and therefore development proposals will be subject to strict criteria.	All Habitats Sites	This is a policy to prevent too many betting offices within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC7	<i>Evening and night-time activities</i>	This policy recognises that evening and night-time food, drink, leisure and culture businesses and organisations are an important part of the Tower Hamlets economy and contribute to the vitality, vibrancy and sense of place of town centres and as such relevant proposals will be supported subject to set criteria.	All Habitats Sites	This policy seeks to support the evening and night time economy within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC8	<i>Short-stay accommodation</i>	This policy seeks to steer visitor accommodation towards the Central Activities Zone, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas, and the borough's District Centres, or in other locations with very good public transport accessibility.	All Habitats Sites	This policy provides the principles for development for visitor accommodation e.g. hotels within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
<b>Community Infrastructure</b>						
CI1	<i>Supporting community facilities</i>	This policy seeks to maintain an adequate supply and range of				

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		community facilities across the borough to serve local needs and support the creation of more liveable and sustainable places.				
C12	<i>Existing community facilities</i>	This policy seeks to protect and enhance the borough's existing community facilities where they are still needed to adequately meet local needs.	All Habitats Sites	A development management policy in relation to the availability of community facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
C13	<i>New and enhanced community facilities</i>	This policy seeks to ensure that appropriate high quality community facilities are provided in accessible locations throughout the borough, particularly via methods of active travel and public transport, to adequately support the growing population and meet identified needs.	All Habitats Sites	A development management policy in relation to the availability of community facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
C14	<i>Public houses</i>	This policy seeks to protect existing public houses within the borough with development proposals not supported for the loss of a public house unless strict criteria are met.	All Habitats Sites	A positive policy seeking to promote the use of active travel and public transport within the borough in relation to accessing community facilities which will therefore potentially divert pressure away from the Habitats Sites.	No LSE therefore no in-combination effect.	Screened out
C15	<i>Arts and Culture facilities</i>	This policy seeks to protect existing arts and cultural facilities. Development proposals which include the loss of an arts or cultural facility will not be supported unless subject to meeting strict criteria.	All Habitats Sites	A policy in relation to existing public houses. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
C12	<i>Arts and Culture facilities</i>	This policy seeks to protect existing arts and cultural facilities. Development proposals which include the loss of an arts or cultural facility will not be supported unless subject to meeting strict criteria.	All Habitats Sites	A development management policy in relation to the availability of arts and cultural facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
<b>Biodiversity and open space</b>						
BO1	<i>Green and blue infrastructure</i>	This policy seeks to protect and enhance the borough's valuable network of open spaces as well as promote the creation of new publicly accessible open spaces which are better connected and provide a wide range of opportunities for local communities and visitors in line with the Open Space Strategy, Green Grid Strategy and other relevant strategies.	All Habitats Sites	A positive policy providing for the protection and creation of Local Green and Blue infrastructure. This policy has the potential to divert recreational pressure away from sensitive Habitats sites.	No LSE therefore no in-combination effect.	Screened out
BO2	<i>Open spaces and the Green Grid network</i>	This policy aims to ensure that development proposals do not negatively impact the existing network of publicly accessible open space and contributes to its expansion and enhancement. It also seeks to maximise the opportunities for delivery of new open space and for enhancing accessibility and connectivity to the wider network, which is considered crucial to addressing the borough's open space deficiency	All Habitats Sites	This policy promotes the use and access to open spaces within the Borough which could therefore lead to increased recreational and pressures and therefore disturbance on nearby Habitats sites. The policy approach to look at this strategically could have potential to be beneficial as access can be managed, monitored and mitigated as necessary, depending on how the policy is implemented. This policy	By improving access to open spaces it has the potential to give rise to 'in-combination' effects with other plans and projects.	Screened in

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
				could result in LSE on nearby Habitats sites.		
BO3	<i>Water spaces</i>	This policy provides details of how the borough's water spaces will be protected and how the various functions they offer are maintained and enhanced.	All Habitats Sites	A positive policy providing for the protection of water spaces within the borough.	No LSE therefore no in-combination effect.	Screened out
BO4	<i>Biodiversity and access to nature</i>	This policy promotes the need for development proposals to protect and enhance biodiversity and contribute to nature recovery in the borough via a range of different means including: Protecting and retaining existing habitats and features of biodiversity value, delivering a biodiversity net gain, avoiding negative impacts on any designated European site and avoiding harm to biodiversity including within SINC sites and Local Nature Reserves.	All Habitats Sites	This is a positive policy that seeks to protect nature conservation sites including Habitats sites and embeds Biodiversity Net Gain within Planning Policy.	No LSE therefore no in-combination effect.	Screened out
BO5	<i>Urban greening</i>	LBTH will expect development proposals to maximise opportunities for urban greening. This includes the integration of high quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls, and Sustainable Drainage Systems.	All Habitats Sites	A positive policy that seeks the inclusion of urban greening measures. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
BO6	<i>Play and recreation spaces</i>	Development proposals must provide or help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play.	All Habitats Sites	Whilst this policy seeks to increase opportunities for play and informal recreation, it is considered to be targeted towards facilities with the community and therefore unlikely to increase in recreational pressures on nearby Habitats Sites, particularly as these all fall outside of the Borough and therefore no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
BO7	<i>Food growing</i>	LBTH will seek to protect existing allotments and community gardens and maximise the provision of new food growing spaces to support sustainable food growing locally, and to enhance opportunities for leisure, social interaction, improved physical and mental health, and education	All Habitats Sites	A positive policy seeking to utilise land within the Borough for food growing and not development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
<b><i>Movement and Connectivity</i></b>						
MC1	<i>Sustainable travel</i>	<p>This policy promotes the development of a healthy, safe, and environmentally friendly transport system that is, inclusive, accessible, and affordable for all who live, work, study in, and visit the borough.</p> <p>This policy seeks to manage growth to ensure it does not increase traffic congestion and crowding on public transport due to trip generation from development proposals as well as through-trips.</p>	All Habitats Sites	This is a positive policy to drive significantly improved environmental conditions in the LBTH area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an overall reduction in car trips and improvement in air quality will likely have a positive impact on levels of atmospheric pollution at Habitats sites.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
MC2	<i>Active travel and healthy streets</i>	This policy requires development proposals to improve the quality and connectivity of walking, wheeling, and cycling routes in the area. Development proposals are required to demonstrate how they have applied the Healthy Streets Approach as set out in the London Plan (2021) as part of the transport assessment.	All Habitats Sites	This is a positive policy to drive significantly improved environmental conditions in the LBTH area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an improvement in air quality through reductions in NOx concentrations will have a positive impact on levels of atmospheric pollution at Habitats sites.	No LSE therefore no in-combination effect.	Screened out
MC3	<i>Impacts on the transport network</i>	This policy seeks to ensure that the impact that development proposals have (both individually and cumulatively) on the transport network is fully assessed at the project level, particularly issues of congestion, air quality, severance, safety, and accessibility for cyclists and pedestrians.	All Habitats Sites	This is a positive policy that promotes the use of public and active transport modes and detailed project-level assessments for departure from these. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles. Elements of the policy only relate to potential negative effect pathways in describing further assessment requirements and the policy does not promote or assess these at a plan level.	No LSE therefore no in-combination effect.	Screened out
MC4	<i>Parking and permit-free</i>	This policy seeks to ensure that parking is controlled and managed both on-street and off-street to facilitate sustainable travel patterns, address congestion, and ensure that car use in the borough does not significantly increase along with the expected growth in population.	All Habitats Sites	This is a positive policy that promotes the use of public and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles and vehicles emitting greenhouse gasses.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		Sets out an expectation that car-free should be the starting point for all development.				
MC5	<i>Sustainable delivery, servicing and construction</i>	This policy seeks to address the challenges the borough faces in ensuring the efficient, safe, timely and sustainable movement of goods and materials across the borough, while also seeking to improve air quality and reduce impacts arising from the freight networks. Requires new development to use zero emission vehicles for servicing.	All Habitats Sites	This is a positive policy that promotes the use of sustainable and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on vehicles emitting greenhouse gasses.	No LSE therefore no in-combination effect.	Screened out
<b>Reuse, Recycling and Waste</b>						
RW1	<i>Managing our waste</i>	This policy seeks to develop a well-planned and integrated network of waste management facilities across the borough to address future capacity needs and contribute towards managing waste generated within the borough over the plan period.	All Habitats Sites	This is a positive policy as it aims to make waste collection more efficient across the Borough.	No LSE therefore no in-combination effect.	Screened out
RW2	<i>New and enhanced waste facilities</i>	This policy relates to new and enhanced waste management facilities (including those replacing, expanding, or intensifying existing sites as well as capacity on sites) and seeks to direct them towards the most	All Habitats Sites	This is a positive policy as it aims to make waste collection more efficient across the Borough.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI <sup>31</sup>	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		appropriate and sustainable locations which do not have any unacceptable environmental and transport impacts. Requires infrastructure to facilitate transition of fleet to low and zero emission vehicles.				
RW3	<i>Waste collection facilities in new development</i>	This policy will help to ensure that waste is collected and managed in a sustainable manner. It is also intended to increase the amount of waste which can be recycled and composted from all developments, and to improve waste collection systems in developments with communal waste facilities.	All Habitats Sites	This is a positive policy as it aims to make recycling as easy as possible therefore resulting in higher recycling rates within the Borough.	No LSE therefore no in-combination effect.	Screened out

- 7.2.30 Most of the policies in the LBTH Local Plan can be concluded not to pose a risk of LSE following the screening exercise. These policies inherently present no pathway of effects and generally set out general development or planning protection principles, largely without specifying a quantum of growth or development schemes.
- 7.2.31 Three policies; HF1 – Meeting housing needs, EG2 – New employment space and BO2 – Open spaces and the Green Grid networks are screened in and as such require further consideration in this HRA at Stage 2 Appropriate Assessment. In the case of Policies HF1 and EG2 they have the potential for increased traffic (and therefore impacts on air quality), as well as the potential for increased demand on water resources (and therefore resulting in hydrological changes to Lee Valley SPA and Ramsar), and for all policies (HF1, EG2 and B02) they may result in increased recreational and development pressures and therefore disturbance on nearby Habitats sites.

## 8 Detailed Screening Discussion

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8.1.1 The results of the Screened in LSE are outlined below. The discussion is presented by designated site and LSE.

### 8.2 Epping Forest SAC

#### Air Quality

8.2.1 This section considers the potential adverse effects on integrity of Epping Forest SAC from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.2.2 Detailed assessment is provided within the supporting *Air Quality Information Report to Support Habitats Regulations Assessment* (WSP, 2024).

8.2.3 For each of the site allocations, the proposed land use has been applied as set out in Table 5-3 'applicable/refined AQ Zol' column, which has been used to determine the average trip length/refined Zol (based on the average journey lengths provided within the Air Quality Neutral Guidance). These distances have then been applied both 'as the crow flies' and via road (which represents a more realistic scenario) to determine which site allocations lie within the refined ZOI, and therefore require further consideration, and those that lie outside of the refined ZOI and can be screened out.

8.2.4 As a result, the majority of site allocations can be screened out of further assessment because there is no identified receptor pathway. This is due to these site allocations sitting outside of the Zol (based on the proposed land uses) both 'as the crow flies' (and therefore via road, as this distance would inevitably be greater).

8.2.5 The following site allocations have been identified as being within the relevant refined Zol where there is a potential receptor pathway (adopting a precautionary approach using the highest average trip lengths for the different types of development proposed):

- 3.6 – Hackney Wick Station
- 3.7 – Hepscoth Road
- 3.8 – Sweetwater

These three allocations have therefore been taken forward for further assessment at Appropriate Assessment (and calculation of trip rates and assignment across the network, as appropriate).

8.2.6 It should be noted that the screening does not allow for windfall sites (unallocated or undesignated) which could deliver an estimated 2,500 homes over the Local Plan period. These have been automatically screened in, applying the precautionary principal. However, it is likely that a proportion of these would be located on previously development / brownfields sites outside of the identified Zol.

### **Conclusions**

8.2.7 Likely Significant Effects cannot be ruled out for Epping Forest SAC as a result of air quality (air pollution) led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

### **Recreational pressure due to public access / disturbance**

8.2.8 This section considers the potential adverse effects on integrity of Epping Forest SAC from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.

8.2.9 The basis of this assessment lies with the precautionary approach taken for maximum trip distance within an Inner London location of 7.2km for residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.

8.2.10 The closest Proposed Allocation to Epping Forest SAC is Sweetwater, Site ID 3.8 (4.9km north-west from Epping Forest SAC at its closest point by access). A further of 12 Allocations fall within the precautionary 7.2km Zol.

8.2.11 All other Proposed Allocations fall outside of this Zol and therefore increased recreational pressure on the SAC as a result of these allocations can be scoped out of further assessment and not considered further within this screening exercise.

8.2.12 The 7.2km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area than the 7.2km applied at initial screening stage to ensure all potential Habitats sites are considered for inclusion within the assessment.

8.2.13 Visitor studies undertaken for Epping Forest have identified a 6.2km 'zone of influence' for the site, within which new housing development is assumed likely to have a significant effect in combination. This area forms the basis of the Epping Forest Strategic Access Management and Monitoring Strategy (SAMM) that is relied on by councils local to the SAC as mitigation for the potential effects of housing growth in their administrative areas.

8.2.14 Four allocation sites are present within this refined 6.2km zone assuming ‘as the crow flies’ straight-line distance only. These are:

- 3.6 - Hackney Wick Station
- 3.7 - Hepscott Road
- 3.8 - Sweetwater
- 3.4 - Bromley by Bow

8.2.15 These allocations have therefore been screened in for further consideration at Appropriate Assessment.

### Assessment of potential effects

8.2.16 The SIP for Epping Forest SAC identifies that Epping Forest is subject to high recreational pressure with a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. It is anticipated that population and visitor numbers are likely to continue to increase. Increased recreational pressure as a result of additional housing and new employment space within the Borough as set out under Policy HF1 and EG2 of the Local Plan is considered to be a risk to this Habitats Site.

### Conclusions

8.2.17 Likely Significant Effects cannot be ruled out for Epping Forest SAC as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

## 8.3 Lee Valley SPA and Ramsar

### Air Quality

8.3.1 This section considers the potential adverse effects on integrity of Lee Valley SPA & Ramsar Site from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.3.2 The SIP for Lee Valley is the source of screening assessment set out in Table 7-2, as *Air Pollution: risk of atmospheric nitrogen deposition* is listed in that document as a ‘Threat’, but specifically only in association with the qualifying feature A021(NB) Bittern (*Botaurus stellaris*) and an associated action on Natural England to ‘Investigate the potential impacts of air pollution’.

8.3.3 Lee Valley SPA is a large and fragmented Habitats site, with distinct and separate component areas of waterbodies extending from Ware in the north, approximately 26km south to Clapton. In considering the unique underpinning SSSIs, not all of these sites are designated for Bittern and those locations close to the Local Plan ZOI (Walthamstow Reservoirs, Walthamstow Marshes SSSI) are not designated for the species. Bittern are predominately associated with components of the SPA and

Ramsar further north, notably Turnford & Cheshunt Pits SSSI, over 10km north of the SPA/Ramsar components which are the focus of this assessment in proximity to LBTH. It is therefore concluded that this aspect of the SIP is not targeted at the Habitats sites component parts within the identified Zol.

- 8.3.4 The SSSI Units underpinning the SPA and Ramsar sites for Lee Valley have all been recently assessed (2022) by Natural England to be Favourable. This applies to Units in proximity to the A503 (identified at Regulation 18 HRA Screening as the point of greatest consideration for air quality where it bisects the SPA and Ramsar) as well as Units more distant from the A503. SSSI Units outside the SPA/Ramsar but contiguous with it include those not in favourable condition, but this is clearly stated to be due to hydrological supporting processes and invasive non-native species. There is no indication of an existing adverse effect from the highway on the site condition, which could be considered to apply equally to any supporting habitat of the SPA and Ramsar.
- 8.3.5 On the basis of the points above of no detectable adverse effect associated with air quality on the SPA and Ramsar (via underpinning SSSI Units), and the absence of the qualifying feature for which triggers the SIP consideration of air quality as a threat within the overall Lee Valley SPA, it is considered that air quality can be discounted from further consideration of Likely Significant Effects on the Lee Valley SPA and Ramsar sites.

**Recreational Pressure due to public access / disturbance**

- 8.3.6 This section considers the potential adverse effects on integrity of Lee Valley SPA and Ramsar from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.
- 8.3.7 The basis of this assessment lies with the precautionary approach taken for maximum trip distance within an Inner London location of 7.2km for residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.
- 8.3.8 The closest Proposed Allocation is Hackney Wick Station, which is located 3.83km from the SPA / Ramsar with a total of 800 units allocated as part of this development site. A further 17 Proposed Allocations fall within the 7.2km Zol.
- 8.3.9 All other proposed allocations fall outside of this Zol and therefore increased recreational pressure on the SPA / Ramsar as a result of these allocations can be scoped out of further assessment and not considered further within this screening exercise.
- 8.3.10 The 7.2km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site and ensuring all relevant Habitats sites were included

in the Screening stage. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area than the 7.2km applied at this screening stage.

8.3.11 The results obtained from Epping Forest surveys of visitor pressure (Liley *et al*, 2018) identified a threshold of 6.2km where visitor numbers from outside this area dropped to ‘very low’.

8.3.12 The results obtained from a similar survey at Burnham Beeches (Liley *et al*, 2018) under an identical methodology identified that visitor numbers dropped to a ‘low’ threshold from 5km from the Habitats sites.

8.3.13 Walthamstow Reservoirs Site of Scientific Interest (SSSI) comprises of 10 SSSI units which overlap with the SPA / Ramsar designation. A recent assessment of all SSSI units was carried out in March 2022<sup>32</sup>, which concluded that all 10 units were in favourable condition, with the following commentary provided:

*‘An assessment was carried out looking at bird data provided by the BTO and LWT. The assessment was based upon the guidelines for the selection of ornithological SSSI’s and the monitoring specification for the site. All features are assessed across all units regardless of location. Condition is assessed across the whole site. The site remains an important stronghold for wintering birds including Cormorant, Tufted Duck and Shoveler. For Cormorant and Tufted Ducks numbers exceed the target for the site, for Shoveler numbers have declined in recent years however this is due to them being more widely dispersed across the South-east now and the decline is not as a result of recreational disturbance or a lack in suitable habitat at the site....All features are in a favourable condition.*

8.3.14 It should be noted that the HRA prepared for the London Plan (AECOM, 2019) stated that for Lee Valley SPA / Ramsar that *A single London Plan policy (Policy H1: Increasing Housing Supply) may result in increased urbanisation and demand for recreational greenspace, and has the potential to impact upon the SPA/Ramsar site*. It further added that *‘Future updates to the London Plan and any HRA work will need to take account of the results of planned long-term visitor monitoring of the site’*.

**Assessment of potential effects**

8.3.15 The SIP for Lee Valley SPA identifies that areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog

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<sup>32</sup> [Site feature condition \(naturalengland.org.uk\)](https://naturalengland.org.uk).

walking which have the potential to affect SPA and Ramsar populations directly or indirectly. The closest proposed allocation is Hackney Wick Station, 3.83km from the designated site. Increased recreational pressure as a result of additional housing and new employment space within the Borough as set out under Policy HF1 and EG2 of the Local Plan could be directed at the green spaces in the north-east of the Borough, notably Victoria Park and Hackney Marshes, which form a continuous corridor of green infrastructure north to these Habitats sites.

## Conclusions

- 8.3.16 Likely Significant Effects cannot be ruled out for Lee Valley SPA and Ramsar as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

## Hydrological Changes

- 8.3.17 This section considers the potential adverse effects on integrity of Lee Valley SPA and Ramsar from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development.
- 8.3.18 Development supported by the new LBTH Local Plan is likely to increase demand for water which could indirectly impact Lee Valley SPA and Ramsar as part of it forms the PWS system in London.
- 8.3.19 Potable water in the borough is supplied by Thames Water as part of its London Water Resource Zone (WRZ). The London WRZ is supplied primarily from surface water resources of the River Thames and River Lee (80%), either directly or via storage reservoirs, with the remainder comprising groundwater abstractions. The London WRZ is an integrated system and so direct and specific supply relationships cannot necessarily be made – i.e. it is rarely possible or appropriate to identify a particular ‘source’ for water supply to a specific area. Consequently, direct effects on specific European sites as a result of development within the borough cannot necessarily be identified or quantified.
- 8.3.20 The water resources planning process helps to ensure that growth in water demand does not affect European sites. The Water Industry Act 1991, as amended by the Water Act 2003 and Water Act 2014, requires that all water companies must publish a Water Resources Management Plan (WRMP) that sets out their strategy for managing water resources across their supply areas over the next 25 years and beyond. WRMPs use calculations of Deployable Output (DO) to establish supply/demand balances; this enables water companies to identify those WRZs with potential supply deficits over the planning period. The calculations account for any reductions in abstraction that are required to safeguard European sites and so the WRMP process (with other regulations) helps ensure (as far as is achievable) that future changes in demand will not affect any European sites.

- 8.3.21 Thames Water has accounted for the growth supported by the London Plan in forecasting for the 2019 WRMP and has predicted future deficits from the beginning of the new planning period due to the projected increase in population and the effects of climate change. Thames Water broadly plans to meet these deficits through demand-reduction, new resource exploitation and water transfers into the WRZs using new and existing infrastructure.
- 8.3.22 The 2019 WRMP has been subject to HRA, which has concluded that it will have no adverse effects on any European sites, including Lee Valley SPA/Ramsar and this has been updated by the Revised Draft WRMP 2024<sup>33</sup>. The WRMPs provide the best estimate of future water resource demand, and therefore it is reasonable to assume that the growth set out in the Local Plan can be accommodated without significant effects on any European sites due to PWS abstractions. Furthermore, since the WRMPs explicitly account for the growth predicted by the London Plan, 'in combination' effects between the Local Plan and the WRMP are unlikely to occur.

### **Assessment of potential effects**

- 8.3.23 Parts of the SPA and Ramsar (Walthamstow reservoirs) also form part of the PWS system in London and so it is unlikely that these designations would experience LSE as a result of competition for water resources with that required for public consumption. The WRMP HRA (and HRA of the Revised Draft) has demonstrated that there will be no LSE and/or no adverse effect on site integrity on this site as a result of the WRMP options. Local water-level management is critical to site integrity, although this is closely managed and the Local Plan will not affect the flooding / water management regime employed within the SPA / Ramsar.

### **Conclusions**

- 8.3.24 Although areas of the SPA and Ramsar (Walthamstow reservoirs) form part of the PWS system, the WRMP HRA process has demonstrated that there will be no adverse effects on this site as a result of the WRMP options. This is inherently an in-combination effect pathway as the WRMP does not provide reliable sources to assess the contribution on the LBTH Local Plan 'alone'. As it is uncertain which elements of the WRMP rely on mitigation measures, this effect pathway remains screened-in for Appropriate Assessment.

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<sup>33</sup> [Document library - Thames Water Resources Management Plan \(thames-wrmp.co.uk\)](https://thames-wrmp.co.uk)

## 8.4 In-combination assessment

- 8.4.1 The Habitats sites considered in this assessment alone sit within the geographical area surrounded by six Boroughs within Greater London: Newham, Greenwich, Lewisham, Southwark, City of London and Hackney. The London Plan developed by the Greater London Authority (GLA) also covers the LBTH Area.
- 8.4.2 For each of the Local Plans there are also reports to inform the HRA and these have been consulted where available in this in-combination assessment. The findings from this work are summarise below. Note that the preceding consideration of water resources is by necessity an in-combination assessment and is not reproduced here.
- 8.4.3 Newham Council: It is understood that a Local Plan Refresh is currently underway for Newham Council, however to support their 2018 Local Plan the HRA concluded that *'policies within the plan can be screened out and an Appropriate Assessment for the local plan is not necessary'*
- 8.4.4 Royal Borough of Greenwich: A new Local Plan is currently underway to replace their adopted Core Strategy, with consultation running from 11<sup>th</sup> July 2023 to 5<sup>th</sup> September 2023. However, there is no HRA evidence on the portal.
- 8.4.5 Lewisham Council: Consultation on the Regulation 19 Draft Local Plan was undertaken between 1<sup>st</sup> March and 25<sup>th</sup> April 2023. The supporting Habitat Regulations Assessment concluded that *'the Lewisham Local Plan will not result in a likely significant effect on any European designated sites either alone or in combination'*. (AECOM, 2022).
- 8.4.6 Southwark Council: The Southwark Plan was adopted on the 23rd February 2022. The supporting HRA stated: The policies introduced under the Southwark Plan 2022 have been shown to pose 'no significant effects, alone or in combination' when assessed against the provisions of Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). *This conclusion has been accepted by Natural England following formal consultation 31 It is not therefore not considered necessary to carry out Stage 2 (Appropriate Assessment) and Stage 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment.*
- 8.4.7 City of London: The City of London Corporation is currently consulting on the Draft City Plan 2040. The supporting HRA concluded that: *'Since no likely significant effects on European sites have been identified, no recommendations for changes to the Proposed Submission Draft City Plan or for further HRA work have been made'* (LUC, 2021).
- 8.4.8 Hackney Council: The new local plan was adopted in July 2020. There is is no HRA supporting evidence on the portal.
- 8.4.9 The London Plan (Greater London Authority) also covering LBTH and the above listed London Boroughs stated: *"it was concluded that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be*

*delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.*

- 8.4.10 No HRA documentation is available for Royal Borough of Greenwich Council and therefore it is unknown if LSE exist as a result of their Local Plans. As such, taken together, in-combination LSE cannot be ruled on Habitats sites as a result of policies in the emerging Local Plan when considered with other strategic plans.

### **Conclusion**

- 8.4.11 For the impact pathways identified at HRA Stage 1 Screening, other Local Plan policies in proximity to LBTH have concluded lower risks to Habitats sites, generally no LSE, but the approaches and conclusions are not universally consistent, based on geographical locations and when the Local Plan and associated assessments were undertaken. A precautionary approach has therefore been taken to Screening and Appropriate Assessment of the LBTH Local Plan based on specific consideration of individual allocations, the existing pressures, threats and pathways associated with the Habitats sites within the ZoI, and the most robust available information to support infrastructure planning underpinning any growth within the Borough.
- 8.4.12 No specific additional impact pathways have been identified as part of the in-combination assessment (noting that any mitigation required as part of water resource planning has already been identified in that Screening assessment element).

## 9 Stage 2 Appropriate Assessment

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- 9.1.1 The following LBTH Policies were screened-in at HRA Stage 1 Screening:
- HF1 – Meeting housing needs,
  - EG2 – New employment space and
  - BO2 – Open spaces and the Green Grid networks
- 9.1.2 The impact pathways forming a basis of this screening were identified as follows:
- In the case of Policies HF1 and EG2 they have the potential for increased traffic (and therefore impacts on air quality), on Epping Forest SAC;
  - Policies HF1 and EG2 were also screened-in for the potential for increased demand on water resources (and therefore resulting in hydrological changes) to Lee Valley SPA and Ramsar; and,
  - Policies HF1, EG2 and B02 were screened-in due to potential increased recreational pressures and therefore disturbance on Epping Forest SAC and Lee Valley SPA and Ramsar..
- 9.1.3 This was further refined through HRA Stage 1 Screening discussion to exclude a number of site allocations and support a site-specific approach to Stage 2 Appropriate Assessment.
- 9.1.4 For the air quality impact pathway, allocations under HF1 and EG2 were screened-in as follows:
- 3.6 – Hackney Wick Station
  - 3.7 – Hepscott Road
  - 3.8 – Sweetwater
- 9.1.5 For the recreational impact pathway, allocations under HF1 and EG2 were screened-in as follows:
- 3.6 - Hackney Wick Station
  - 3.7 - Hepscott Road
  - 3.8 - Sweetwater
  - 3.4 - Bromley by Bow

### **BO2 – Open spaces and the Green Grid networks**

- 9.1.6 Following HRA Stage 1 Screening, it has been clarified that no delivery under this policy will extend to networks outside the Borough (and therefore any new or additional connection to habitats sites). In conjunction with the Appropriate Assessment set out for recreational impact pathways, it is not considered that this Policy has potential at a Plan level within the Borough to result in an adverse effect

on the integrity of Habitats sites. Should individual projects come forwards which do not conform to this assumption, it will be necessary to undertake a project-level HRA to ensure that any adverse effects can be avoided, or as necessary, mitigated.

### **Water Resources Impact Pathway**

- 9.1.7 HRA Stage 1 Screening comprised an inherently in-combination assessment on the potential impact pathway of water resource use and LBTH Local Plan Policies HF1 and EG2 relating to site allocations. The main source of information in informing this assessment is the Thames Water WRMP information (2019 as adopted, 2024 updated draft), which is not something that can be effectively replicated at a Borough scale due to the large geographical nature of water resources.
- 9.1.8 It is noted that water-dependent habitats sites, specifically Lee Valley SPA and Ramsar, are specifically assessed throughout the supporting HRA information for the WRMP under a number of potential strategic measures. All of the assessment outcomes for these WRMP component projects conclude either no LSE, or no adverse effect on site integrity, once mitigation is applied.
- 9.1.9 As this conclusion on water resources has been reached for certain WRMP component projects after the application of mitigation, this impact pathway has been included within this Appropriate Assessment for the LBTH Local Plan as a potential contributor to the need for these infrastructure projects and therefore an in-combination impact pathway may be present.
- 9.1.10 Providing the mitigation measures identified with the WRMP assessments are implemented, the LBTH Local Plan HRA has concluded that this impact pathway will not result in an adverse effect on site integrity of Lee Valley SPA (and Ramsar designation) and this impact pathway will not be considered further in this HRA.

## **Epping Forest SAC**

### **Epping Forest – Recreation**

- 9.1.11 Following detailed consideration of access routes and clarification over Policy BO2 that new recreational access routes will not be created to improve links to Epping Forest SAC, a refined consideration of access routes within the 6.2km potential Zol has been applied.
- 9.1.12 LBTH is separated from Epping Forest SAC by extensive urban development in the Leyton area, with very limited public rights of way or desirable access routes. This contrasts with the existing extensive open green space provided closer to and within the Borough at Victoria Park and Hackney Marshes. In considering how residents access suitable green space, it is not considered likely that residents would travel past these accessible areas, as improved under Policy BO2, to contribute to pressures at Epping Forest. Access points to Epping Forest SAC via these green routes is possible, but involves journeys significantly in excess of the indicated 6.2km trip length.

9.1.13 Based on the Epping Forest Visitor Survey (Footprint Ecology, 2017), the following points are considered relevant in reaching this conclusion:

- *99% of interviewees had come for a short visit directly from home (i.e. as opposed to being on holiday or staying away from home in the area);*
- *Dog walking was the commonest activity (49% of interviewees), with other activities including walking (22%), outing with the family (9%), cycling/mountain biking (8%) and jogging/running/power walking (5%);*
- *Visits were typically relatively short, either 30 minutes to an hour (33% of interviewees) or 1-2 hours (43%);*
- *More than three-quarters (77%) of those interviewed had arrived by car. A further 14% had arrived on foot and 5% by bicycle.*
- *... the survey point with the most people entering or passing was, by some considerable margin, Connaught Water (13.2km from LBTH boundary).*
- *Besides other locations within Epping Forest (cited by 16% of interviewees), the most commonly named alternatives were the Lee Valley, Wansted, Chingford, the Roding Valley and Walthamstow Marshes/wetlands.*

9.1.14 The visitor survey conclusions indicate that any residents of LBTH are unlikely to bypass the much closer alternative green spaces of the Lee Valley and associated/linked parks and green spaces (as improved under Local Plan policies), to preferentially travel to Epping Forest (including by car) at a considerably greater distance, when the majority reasons for such visits are associated with routine activities for short durations.

9.1.15 Due to a lack of access connectivity, an adverse effect on site integrity on Epping Forest SAC from the Local Plan as a result of recreational pressure is not anticipated.

### **Epping Forest – Air Quality**

9.1.16 Following the screened-in impact pathway for air quality effects, further consideration has been given to the specific allocations identified to take account of existing Plan-level HRA outcomes and the details of the allocations themselves.

9.1.17 The locations of the proposed site allocations were considered relative to Epping Forest SAC. Three site allocations were shortlisted due to an identified receptor pathway. These were: Hackney Wick Station, Hepscott Road, and Sweetwater.

9.1.18 All three of these sites are located within the administrative boundary of the LLDC and as such have already been subject to HRA. The LLDC Local Plan HRA concluded that there would be no LSE on Epping Forest SAC providing the following mitigation is implemented:

*“Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where: ... An air quality assessment shows*

*that a proposed development would result in significant effects on habitats within European Sites.”*

- 9.1.19 None of the extant planning applications for the three shortlisted site allocations have been supported by project level HRA to date. Where air quality assessments have been undertaken for the already consented schemes, these determined that effects would be not significant and in most cases below traffic data screening criterion (for human health). In general, parking was limited to blue badge holders only.
- 9.1.20 Notwithstanding the above, traffic data calculations were undertaken for these three sites to determine the ‘worst case’ number of trips that could travel on roads within the vicinity of Epping Forest SAC (both within London Borough of Waltham Forest and Epping Forest District Council’s administrative areas). These figures were then compared to JNCC’s decision-making thresholds to determine whether potential effects could be screened out as ‘de-minimis’ or whether further assessment was required to consider effects due to LBTH’s Local Plan, both ‘alone’ and ‘in-combination’.
- 9.1.21 It was noted that:
- The shortlisted sites have an existing land-use that was unable to be taken into account during the traffic data calculations. They are therefore likely to be a significant overestimation of the net change in traffic due to the emerging Local Plan.
  - These represent total change within LBWF and EFDC and not the specific change on roads that lie within 200m of Epping Forest SAC.
  - These assume that all cars will have tailpipe emissions (i.e. they have internal combustion engines) which is very worst case / unrealistic as the percentage of EVs is predicted to increase, especially given the policy context, the expansion of the Ultra Low Emission Zone, and measures with Tower Hamlets Transport Strategy regarding EV charging provision.
- 9.1.22 The subsequent qualitative assessment included evidence and trend data relevant to trip length, trip destination, travel demand, modal shift, car ownership, cycling and transition to a zero-emission vehicles. This qualitative evidence supports:
- LBTH’s has the lowest level of car-ownership among all London boroughs.
  - Many trips are short in length and internal to the borough.
  - That the LBTH’s emerging Local Plan is likely to make a negligible contribution to in-combination effects at Epping Forest SAC.
  - An increase in active travel modes, particularly cycling.
  - The borough is well placed / has characteristics to enable significant growth in cycling.
  - LBTH has a very strong and accessible public transport network with further improvements proposed.
  - The wider climate change agenda will also support in facilitating modal shift.

- 9.1.23 LBTH's Transport Strategy has not been quantitatively assessed but contains a series of short-term and long-term actions that will be taken to support the overall objectives of the Local Plan and help to support growth within the Borough. Whilst the Transport Strategy focuses on the delivery of measures that encourage more trips by foot, bike or public transport, it is recognised that some people will only be able to travel using private vehicles for some of their journeys. Therefore, it also contains a suite of measures for supporting Tower Hamlets' transition to a zero-emission fleet including the provision of charging infrastructure for EVs.
- 9.1.24 When taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. This is consistent with the findings of LBWF's Local Plan HRA which concluded that trips through Epping Forest SAC would be 'de-minimis' when considering the net change in trips resulting from their Local Plan (e.g. due to replacing existing development with largely car free development).
- 9.1.25 With reference to the LLDC Local Plan HRA conclusion that "*Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where: ... An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.*" the findings of this Appropriate Assessment broadly support this conclusion, however would not seek to rely on Project level HRA as a specific mitigation measure. The conclusion of this Appropriate Assessment for the impact pathway of air quality on Epping Forest SAC is that an adverse effect of site integrity is not likely to occur when considered at a Plan level.
- 9.1.26 A Project-level HRA should be required where the assumptions set out in this assessment are deviated from.

## Lee Valley SPA and Ramsar

### Lee Valley – Recreation

- 9.1.27 LSE could not be ruled out for Lee Valley SPA and Ramsar as a result of increased recreational pressure led by Local Plan policies within the Borough at the HRA Stage 1 Screening Stage, as site allocations under Policies HF1 and EG2 could lead to additional residents (and potentially recreational users) within a proximity where such access could not be discounted. The closest allocation was identified as Hackney Wick Station, 3.83km for the Lee Valley Habitats Sites. Further consideration was therefore recommended at Appropriate Assessment.
- 9.1.28 In considering whether it is likely that residents of LBTH will access the location of the Habitats sites within the Lee Valley, it was noted in responses to the Epping Forest Visitor Surveys (Footprint Ecology, 2017) that the considerable majority of users of that site were accessing from local areas for routine and short-duration activities, notably dog walking and general walking. Those visitors also named Lee

Valley and Walthamstow Wetlands as suitable alternatives they would choose to visit for those purposes. It is therefore reasonable to conclude that the Lee Valley, the associated linked parks and green spaces, and the Habitats sites associated with the Lee Valley, would be attractive to new residents within a suitable range for the purposes of recreation and general access.

- 9.1.29 Consideration was therefore applied to the areas of the Lee Valley designated SPA and Ramsar, which are wholly within the Walthamstow Wetlands fully operational 160 hectare Thames Water reservoir site, managed by the London Wildlife Trust (LWT). The Habitats sites are therefore controlled in two specific and highly monitored and managed aspects: firstly, the safety and security consideration associated with reservoirs managed for public water supply by Thames Water, and secondly the active management and control of the site by the Wildlife Trust including published rules prohibiting access outside designated public areas, controlled site access hours, site ranger supervision and seasonal closures of specific areas of the sites.
- 9.1.30 The above measures are based on the geographical location of Walthamstow Wetlands within an existing highly urbanised area, where uncontrolled and unmanaged access would have previously led to significant adverse impacts on the qualifying features of the SPA and Ramsar sites. As the management approach does not therefore rely on specific numbers of nearby residents, but by strict segregation of recreational or incompatible uses of the site and Conservation Objectives without reliance on immediately adjacent functionally linked land, the presence of allocations within a Zol where residents or occupants may choose to access the location of the designations is not considered to give rise to an adverse effect on site integrity, providing effective management of all recreational/disturbance continues.
- 9.1.31 A conclusion of no adverse effect on site integrity as a result of recreational and disturbance pressure on the Lee Valley SPA and Ramsar sites as a result of the LBTH Local plan can therefore be reached, including the consideration of this (in place and functioning) mitigation.

## 10 Conclusions

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- 10.1.1 This document provides guidance on the likely data sources, information requirements and the process of HRA Screening and Appropriate Assessment. It also provides a discussion of where the ecological implications of the LBTH Local Plan have been considered and which Habitats sites are vulnerable to known pressures, threats and existing impacts.
- 10.1.2 There are no Habitats sites within LBTH's administrative area, however there are three Habitats sites that fall within the identified precautionary 7.2km Zol of the Borough boundary (Epping Forest SAC; Lee Valley SPA and Ramsar site) and as such impact pathways for these Habitats sites from the policies of the Local Plan have been carefully considered.
- 10.1.3 A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HF1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 Appropriate Assessment. These policies were identified to have potential for Likely Significant Effects on nearby Habitats sites relating to increased or re-distributed traffic (and therefore impacts on air quality), water resource implications, and increased public access, recreational and disturbance pressures.
- 10.1.4 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 10.1.5 Policy BO2 was subject to further consultation with the Plan-making body (LBTH) and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 10.1.6 Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1 resulted in a conclusion when taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. This is consistent with the findings of LBWF's Local Plan HRA which concluded that trips through Epping Forest SAC would be 'de-minimis' when considering the net change in trips resulting from their Local Plan (e.g. due to replacing existing development with largely car free development).
- 10.1.7 Air quality considerations at Appropriate Assessment for Lee Valley SPA and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway, but also that the qualifying feature (Bittern) for

which air quality is indicated as a possible pressure or threat is not anticipated to be present within the components of the SPA/Ramsar within the Zone of Influence of LBTH.

- 10.1.8 Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plan. It is acknowledged that under some scenarios and strategic projects, this conclusion is supported by the use of mitigation measures.
- 10.1.9 Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways between LBTH (as opposed to ‘as the crow flies’ distances), the reasons for visits to Epping Forest as derived from published visitor surveys, and the presence of more extensive and equally attractive green spaces closer to LBTH for those activities.
- 10.1.10 Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements within the Zone of Influence of LBTH (a component of the overall SPA and Ramsar in the Lee Valley) being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access. This mitigation for existing significant recreational and disturbance pressure is considered to be in place, effective and functioning in a manner that is not dependent on Local Plan allocations and overall resident numbers.
- 10.1.11 The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 10.1.12 For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified. In two instances this has included consideration of mitigation, but these measures are already in place and functioning, or proposed to address in-combination effects as part of strategic infrastructure delivery, not reliant on specific actions undertaken by LBTH.
- 10.1.13 Should separate Plans of projects come forwards which deviate from the assumptions set out here in this Plan-level HRA, a Project -level HRA should be undertaken to confirm that the conclusions set out here remain accurate and address any additional avoidance or mitigation measures, as necessary.

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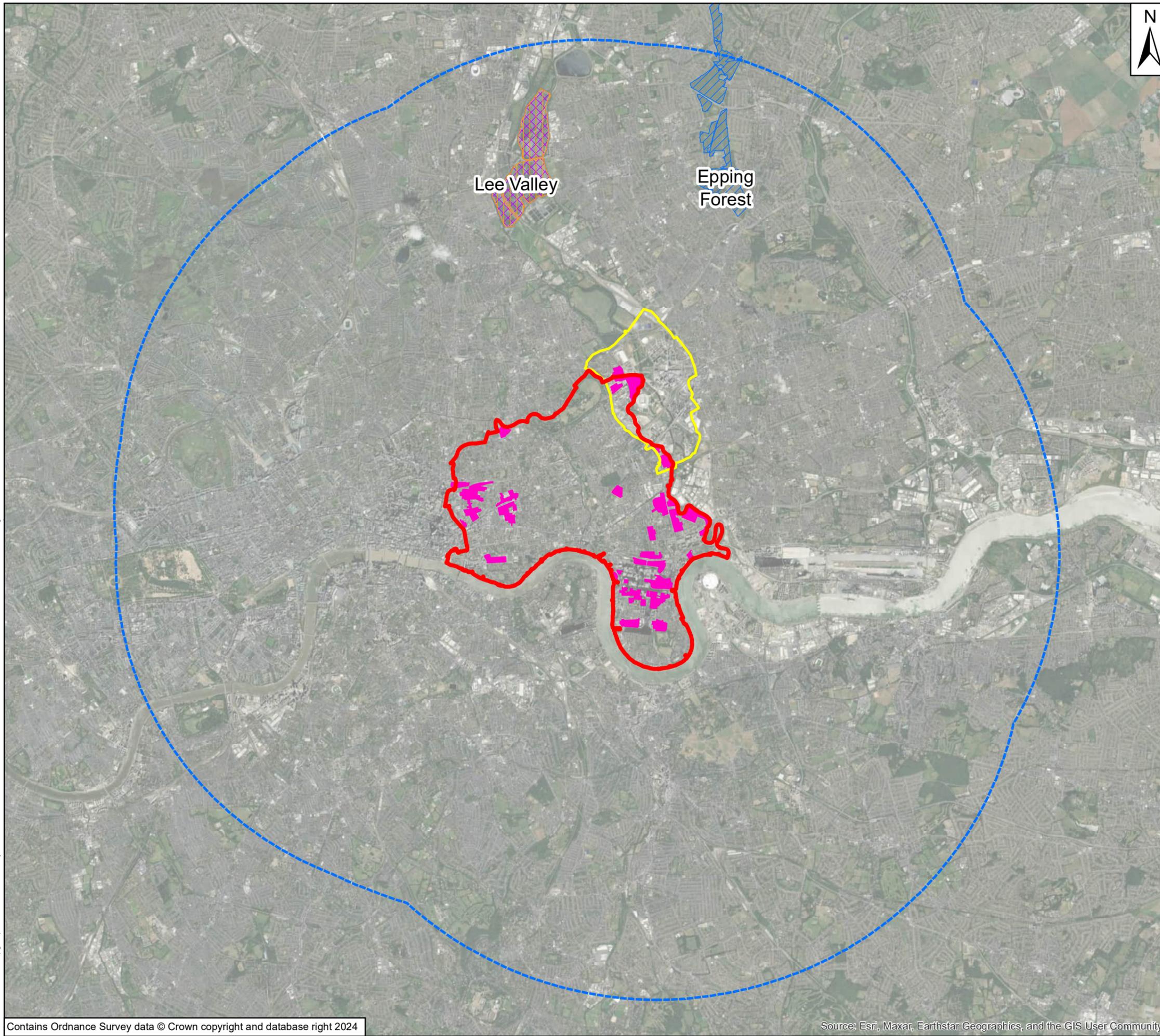
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## Figures

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**Figure 1 – Habitats Sites within a 7.2km Zol of LBTH allocated sites**

**Figure 2 – Allocated Sites within Epping Forest SAC buffer zones and Air Quality Zol**



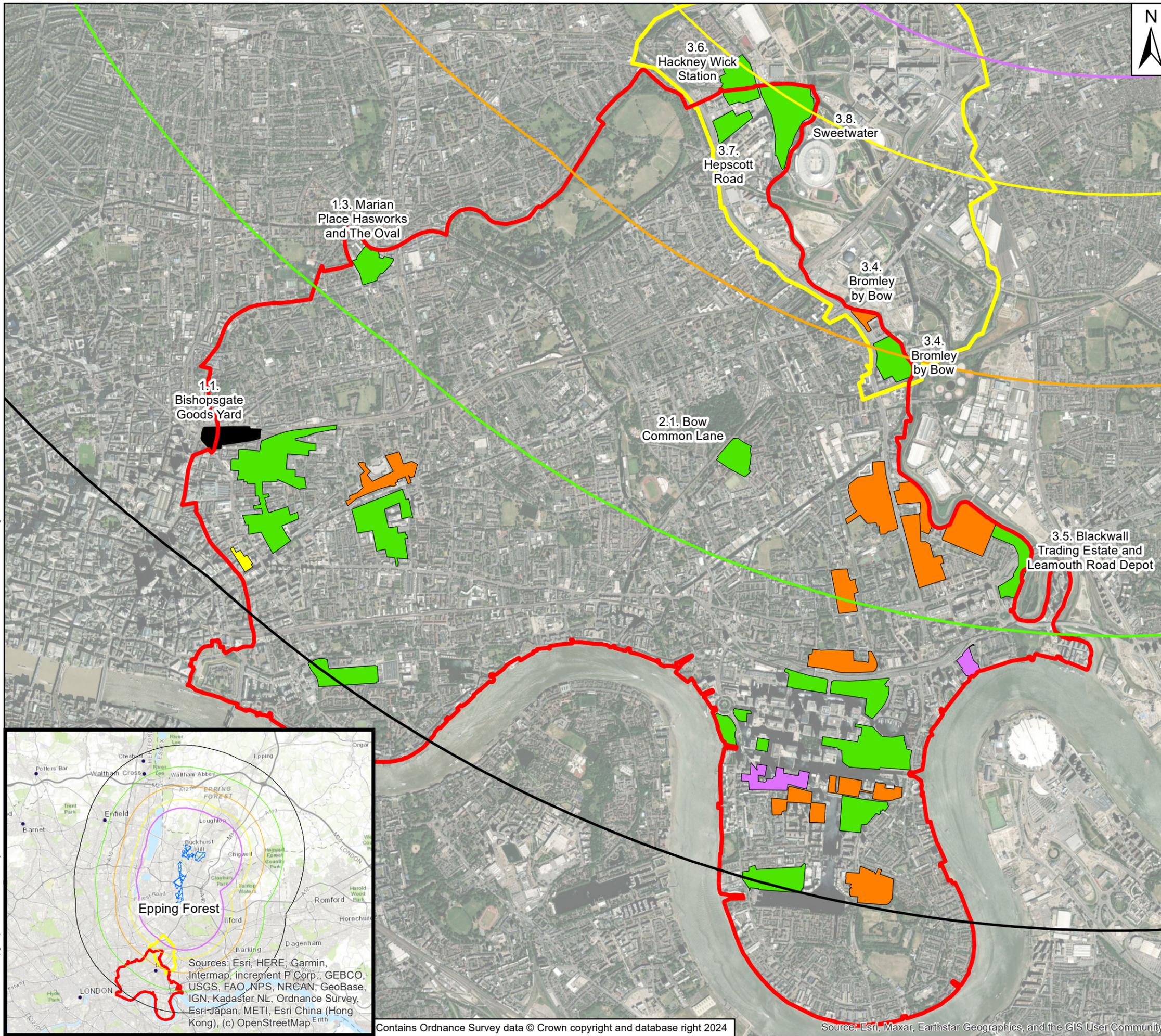
**Key**

- London Borough of Tower Hamlets (LBTH)
- London Legacy Development Corporation (LLDC)
- 7.2km Zone of Influence (Zoi)
- Special Area of Conservation
- Special Protection Area
- Ramsar Site - Wetland of International Importance
- Allocated Sites



<small>Client:</small>	London Borough of Tower Hamlets
<small>Project:</small>	London Borough of Tower Hamlets New Local Plan
<small>Title:</small>	Habitat Sites within a 7.2km Zoi of LBTH allocated sites

<small>Drawing No:</small>	Figure 1	<small>Drawn:</small>	SD
<small>Date:</small>	19/06/2024	<small>Checked:</small>	XXX
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### Key

- London Borough of Tower Hamlets (LBTH)
- London Legacy Development Corporation (LDCC)
- Special Area of Conservation

#### Air Quality Zol Buffers of SAC

- 3.4km of SAC
- 4.2km of SAC
- 5.5km of SAC
- 7.2km of SAC
- 9.2km of SAC

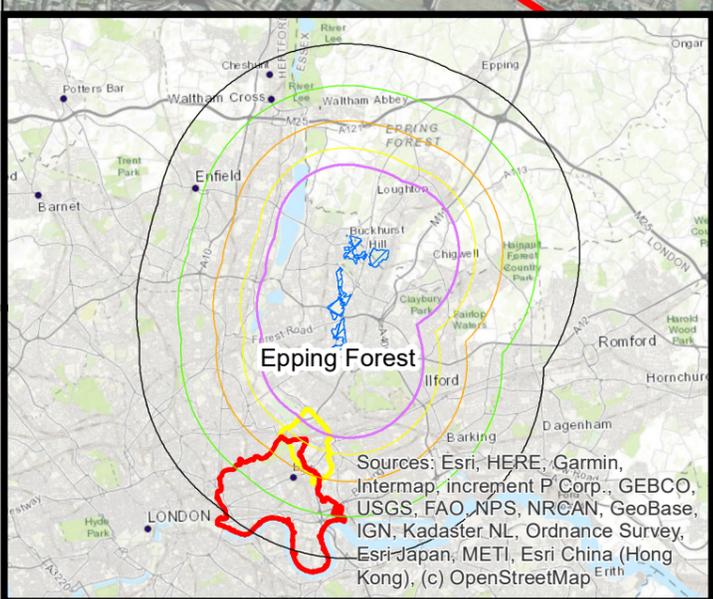
#### Allocated Sites-Air Quality Zol Buffers

- 3.4 km
- 4.2 km
- 5.5 km
- 7.2 km
- 9.2 km



<b>Client:</b>	London Borough of Tower Hamlets
<b>Project:</b>	London Borough of Tower Hamlets New Local Plan
<b>Title:</b>	Allocated Sites within Epping Forest SAC buffer zones and Air Quality Zol

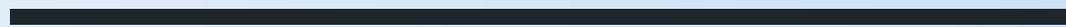
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Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster.NL, Ordnance Survey, Esri-Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap

# Appendix A

**CJEU Rulings**



## The Council for Justice of the European Union (CJEU) rulings

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A number of CJEU rulings are relevant to the HRA screening exercise and are noted below. At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgments handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament. The Supreme Court will, however, be at liberty to depart from these judgments after 31 December 2020 if they consider it appropriate to do so.<sup>34</sup>

### The Wealden Judgement

The Wealden Judgement<sup>35</sup>, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats sites were only considered alongside roads where the traffic growth associated with the individual Plan or Project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07<sup>36</sup>), which has been subsequently withdrawn namely:

- increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites

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<sup>34</sup> Freeths Habitats Regulations update 2020. Available at: <https://communications.freeths.co.uk/44/1637/october-2020/the-habitats-regulations-assessment-regime-after-31-december-2020---how-will-it-look-.asp?sid=8bf6fad5-597a-43c6-8f70-61503ec0adb9>

<sup>35</sup> Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

<sup>36</sup> *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)*. Withdrawn, but available online: <https://standardsforhighways.co.uk/dmrb/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae>

should have been carried out and quashed part of the Local Plan that would have led to an in-combination exceedance of 1,000 AADT.

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed “in combination” assessment is required in relation to changes in air quality:

1. Is your plan or project putting emissions into the air?;
2. If so, are those emissions at a level where they could actually be measured / perceived?; and
3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

### **People over Wind (The Sweetman Case)**

The Court of Justice of the European Union’s (CJEU’s) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)<sup>37</sup> (hereafter referred to as the ‘Sweetman Case’), states that:

*‘Article 6(3) ..... must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’*

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the

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<sup>37</sup> Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta Available online: <https://curia.europa.eu/juris/document/document.jsf?jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634>

Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for 'in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

## **CJEU Ruling in the Netherlands nitrogen and agriculture cases c-293/17 and c-294/17**

The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:

- An 'Appropriate Assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.
- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

Of particular relevance to the assessment of air quality effects on Habitats sites, the Court of Justice of the European Union ruled that:

"An 'Appropriate Assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.



## Kokott Ruling

In the Opinion of Advocate General Kokott in Case C-6/04 Commission v UK [2005] ECR I-9017 at paragraph 49 she noted that an assessment of plans cannot by definition take into account all effects because

*“Many details are regularly not settled until the time of the final permission” and “[i]t would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure”.*

# Appendix B

**Habitats Sites Details, Including  
Qualifying Features and  
Conservation Objectives**



Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
<b>Epping Forest SAC</b>	1630.7	<p><b>Annex I habitats that are a primary reason for selection of this site</b></p> <ul style="list-style-type: none"> <li>9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>)</li> </ul> <p>Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.</p> <p><b>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</b></p> <ul style="list-style-type: none"> <li>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>4030 European dry heaths</li> </ul> <p><b>Annex II species that are a primary reason for selection of this site</b></p> <ul style="list-style-type: none"> <li>1083 Stag beetle <i>Lucanus cervus</i></li> </ul> <p>Epping Forest is a large woodland area in which records of stag beetle are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a</p>	<ul style="list-style-type: none"> <li>J02 – Human induced changes in hydraulic conditions</li> <li>A04 – Grazing</li> <li>G01 – Outdoor sports and leisure activities, recreational activities</li> <li>H04 – Air pollution, air-borne pollutants</li> <li>M02 – Changes in biotic conditions<sup>38</sup></li> </ul>	<ul style="list-style-type: none"> <li>P – Air Pollution: impact of atmospheric nitrogen deposition</li> <li>P - Undergrazing</li> <li>P - Public Access/Disturbance</li> <li>T – Changes in species distributions</li> <li>T – Inappropriate water levels</li> <li>T – Water Pollution</li> <li>T – Invasive species</li> <li>T – Disease</li> <li>P/T – Invasive species<sup>39</sup></li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> <li>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>The populations of qualifying species, and,</li> <li>The distribution of qualifying species within the site.<sup>40</sup></li> </ul>

<sup>38</sup> Epping Forest SAC Natura 2000 form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012720.pdf>

<sup>39</sup> Epping Forest Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5732004727881728>

<sup>40</sup> Epping Forest SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/5442443424301056>

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.			
<b>Lee Valley SPA</b>	451.3	<p><b>ARTICLE 4.1 QUALIFICATION (79/409/EEC)</b>  <b>Over winter the area regularly supports:</b></p> <ul style="list-style-type: none"> <li>Bittern <i>Botaurus stellaris</i> (Europe - breeding) 6% of the GB population Five year peak mean for 1992/93 to 1996/97</li> </ul> <p><b>ARTICLE 4.2 QUALIFICATION (79/409/EEC)</b>  <b>Over winter the area regularly supports:</b></p> <ul style="list-style-type: none"> <li>Northern shoveler <i>Anas clypeata</i> (North-western/Central Europe) 1% of the population 5 year peak mean, 1993/4-1997/8</li> <li>Gadwall <i>Anas strepera</i> (North-western Europe) 1.5% of the population 5 year peak mean, 1993/4-1997/8</li> </ul>	<ul style="list-style-type: none"> <li>J02 – Human induced changes in hydraulic conditions</li> <li>H02 – Pollution to groundwater (point sources and diffuse sources)</li> <li>G01 – Outdoor sports and leisure activities, recreational activities</li> <li>K02 – Biocenotic evolution, succession</li> <li>F01 – Marine and Freshwater Aquaculture<sup>41</sup></li> </ul>	<ul style="list-style-type: none"> <li>T – Water Pollution</li> <li>T – Hydrological changes</li> <li>T – Public Access/Disturbance</li> <li>T – Inappropriate scrub control</li> <li>T – Fisheries: Fish stocking</li> <li>T – Invasive species</li> <li>T – Inappropriate cutting/mowing</li> <li>T – Air Pollution: risk of atmospheric nitrogen deposition<sup>42</sup></li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>The extent and distribution of the habitats of the qualifying features</li> <li>The structure and function of the habitats of the qualifying features</li> <li>The supporting processes on which the habitats of the qualifying features rely</li> <li>The population of each of the qualifying features, and,</li> <li>The distribution of the qualifying features within the site.<sup>43</sup></li> </ul>
<b>Lee Valley Ramsar</b>	447.9	<p><b>Ramsar criterion 2</b> - supports vulnerable, endangered, or critically endangered species or threatened ecological communities.</p> <p>Nationally important species occurring on the site:            Whorled water milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a waterboatman).</p> <p><b>Ramsar criterion 6</b> – species occurring at levels of international importance (as identified at designation).</p> <p>Over winter the site regularly supports:</p>	<ul style="list-style-type: none"> <li>Vegetation succession</li> <li>Water diversion for irrigation/domestic/industrial use</li> <li>Eutrophication</li> <li>Persistent drought</li> <li>Introduction/invasion of exotic plant species</li> <li>Recreational/tourism disturbance (unspecified)</li> <li>General disturbance from human activities</li> </ul>		

<sup>41</sup> Lee Valley SPA Natura 2000 form. Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012111.pdf>

<sup>42</sup> Lee Valley Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5788502547496960>

<sup>43</sup> Lee Valley SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/6516586265706496>

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		<ul style="list-style-type: none"> <li>▪ Gadwall <i>Anas strepera</i> (North-western Europe). 456 individuals, representing an average of 1.5% of the population (Five-year peak mean for 1993/94 to 1997/98)</li> <li>▪ Northern shoveler <i>Anas clypeata</i> (North-western/Central Europe). 406 individuals, representing an average of 1% of the population (Five-year peak mean for 1993/94 to 1997/98).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unspecified development: urban use<sup>44</sup></li> </ul>		

<sup>44</sup> Lee Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1037RIS.pdf>

# Appendix C

**APIS Information for SPA and SAC  
Sites within 7.2km of the Allocated  
Sites (2023 data)**



Site	Species	Relevant Critical Load			N Deposition kg N/ha/yr			Ammonia Critical Level $\mu\text{g NH}_3/\text{m}^3$ annual mean	NH <sub>3</sub> Concentration $\mu\text{g}/\text{m}^3$		
		Relevant Habitat	Relevant CL Habitat	CL Range	Maximum	Minimum	Average		Maximum	Minimum	Average
Lee Valley SPA & Ramsar	<i>Anas clypeata</i> (North-western/Central Europe)	N/A	No comparable habitat with established critical load estimate available	N/A	18.6	14.4	15.9	3	2.2	1.5	1.7
	<i>Anas strepera</i> (North-western Europe)	N/A	No comparable habitat with established critical load estimate available	N/A	18.6	14.4	15.9	3	2.2	1.5	1.7
	<i>Botaurus stellaris</i> (Europe - breeding)	Rich fens	Rich fens	15 - 25	18.6	14.4	15.9	3	2.2	1.5	1.7
Epping Forest SAC	<i>Erica tetralix</i>	Northern Atlantic wet heaths	Northern wet heath	5 - 15	17.9	15.3	16.8	1	2.0	1.4	1.6
	European dry heaths	European dry heaths	Dry heaths	5 - 15	17.9	15.3	16.8	1	2.0	1.4	1.6
	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robur-petraeae or Ilici-Fagenion)	Atlantic acidophilous beech forests	Fagus forest on non-acid and acid soils	10 - 15	32.2	27.0	29.7	1 or 3	2.0	1.4	1.6
	<i>Lucanus cervus</i>	Broadleaved deciduous woodland	Broadleaved deciduous woodland	10 - 15	32.2	27.0	29.7	3	2.0	1.4	1.6
	<i>Triturus cristatus</i>	No comparable habitat with established critical load estimate available	No comparable habitat with established critical load estimate available	N/A	18.1	11.2	13.5	3	2.0	1.4	1.6

# Appendix D

## Annual Mean NOX Concentrations



**Table D-1 – Estimated 2023 annual mean background NO<sub>x</sub> concentrations for the area encompassing Lee Valley SPA and Ramsar**

X	Y	Total 2023 background NO <sub>x</sub> concentration (µg/m <sup>3</sup> )**
534500	187500	29.4
534500	188500	27.2
533500	188500	27.0
534500	189500	<b>30.6</b>
535500	189500	28.3
535500	190500	27.7
536500	201500	18.0
537500	201500	16.3
536500	202500	17.2
537500	202500	14.8
536500	203500	16.1
537500	203500	14.0
536500	204500	16.8
537500	204500	13.6
538500	209500	17.1
539500	209500	14.1
538500	210500	15.3
539500	210500	16.4
537500	212500	13.1
538500	212500	12.7
537500	213500	11.9

\*Exceedances of the Critical Level are shown in **bold**.

\*\*Data taken from Defra’s webpages



**Table D-2 – Estimated 2023 annual mean background NO<sub>x</sub> concentration for the area encompassing Epping Forest SAC**

X	Y	Total 2023 background NO <sub>x</sub> concentration (µg/m <sup>3</sup> )**
538500	188500	<b>31.5</b>
539500	188500	29.4
538500	189500	29.2
539500	189500	28.3
538500	190500	<b>33.6</b>
539500	190500	<b>35.7</b>
538500	191500	27.4
539500	191500	27.1
539500	192500	23.8
540500	192500	24.6
541500	192500	24.7
539500	193500	22.6
540500	193500	23.1
541500	193500	22.7
537500	194500	22.9
538500	194500	22.8
539500	194500	21.3
540500	194500	20.9
541500	194500	21.1
537500	195500	21.7
538500	195500	19.3
539500	195500	19.9
540500	195500	20.1

X	Y	Total 2023 background NO <sub>x</sub> concentration (µg/m <sup>3</sup> )**
541500	195500	19.5
537500	196500	21.3
538500	196500	19.7
539500	196500	18.5
540500	196500	18.3
541500	196500	17.6
542500	196500	20.4
540500	197500	17.6
541500	197500	16.5
542500	197500	17.0
540500	198500	17.7
541500	198500	17.2
542500	198500	16.1
543500	198500	15.5
544500	198500	15.5
540500	199500	25.3
541500	199500	19.8
542500	199500	17.7
543500	199500	15.2
544500	199500	15.0
542500	200500	22.4
543500	200500	21.6
544500	200500	17.6
544500	201500	19.9

\*Exceedances of the Critical Level are shown in **bold**. \*\*Data taken from Defra's webpages



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