

London Borough of Tower Hamlets

# Sustainability Appraisal Scoping Report (Consultation Draft)

For the London Borough of Tower Hamlets Local Plan

November 2015

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# 1. Introduction

The Sustainability Appraisal (SA) is a required process for assessing the social, economic and environmental impacts of planning documents, including a Local Plan. It aims to ensure that policies contained in planning documents promotes sustainable development by establishing a systematic evaluation method, which will take account of social, economic and environmental considerations and impacts at all stages of plan making process.

This scoping report forms the first stage of the required Sustainability Appraisal which informs and accompanies the first steps developing a new Local Plan for Tower Hamlets.

This document identifies the scope and level of detail of information to be included in the Sustainability Appraisal. It sets out the context, objectives and approach of the assessment to facilitate the Sustainability Appraisal process being proportionate and relevant to the Local Plan that is being assessed.

This report will inform a statutory consultation with key agencies that hold environmental responsibilities; these agencies include Historic England, Natural England, and the Environment Agency. Other environmental organisations, partners and residents are also invited to make comments. The purpose of this is to obtain feedback on the scope of content and level of detail of the Sustainability Appraisal in the next stage.

## 1.1. The Local Plan

LBTH is in the process of preparing a new Local Plan. The Local Plan will set out the borough's vision, objectives and a planning policy framework for the next 15 years. This new Local Plan will replace the borough's Local Development Framework which consisted of the *Core Strategy 2009* and *Managing Development DPD 2013*. The Local Plan will reflect changes regarding policies following the adoption of the *National Planning Policy Framework (NPPF)*. It will also reflect significant changes that have since taken place, particularly continued population growth and increasing demand for housing, jobs and infrastructure.

The Sustainability Appraisal applies to all documents that form part of the new Local Plan. This includes all Development Plan Documents and Area Action Plans.

## 1.2. Requirements

### 1.2.1 Sustainability Appraisal

The Sustainability Appraisal is a legal requirement for the preparation and development of the Local Plan. The *UK Planning and Compulsory Purchase Act 2004* require a local planning authority to carry out a Sustainability Appraisal of each of the proposals in a Local Plan during its preparation.

Sustainability Appraisals incorporate the requirements of the *Environmental Assessment of Plans and Programmes Regulations 2004* (commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations'), which implement the requirements of the *European Directive 2001/42/EC* (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. SEA ensures that environmental issues are incorporated and assessed in decision-making throughout the entire plan making process.

The Strategic Environmental Assessment Directive stipulates that the aim of the SEA is to: *"provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"* (Article 1).

It identifies factors that need to be considered. These include but are not limited to: biodiversity, population, human health, fauna, flora, soil, water, climatic factors, material heritage and landscapes.

### 1.2.2 UK Guidance for preparing an SEA/ SA

In addition, to the environmental requirements of a SEA, the Sustainability Appraisal is much broader and must also consider economic and social factors that could be impacted by the making and implementation of the Local Plan. Unlike, the SEA there are no specific directives that stipulate requirements for a Sustainability Appraisal. Instead guidance<sup>1</sup> is published by the Department for Communities and Local Government (DCLG) that promotes a combined process to assess social, economic and environmental effects.

In summary, a Sustainability Appraisal must meet the legal requirements for an SEA set out in the EU Directive. It must also incorporate social, environmental and economic aspects which are not specified but are locally determined through the analysis of baseline information and relevant objectives and evidence in policies and plans. This will form the basis of a framework through which the local plan policies will be assessed.

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<sup>1</sup> [www.pas.gov.uk](http://www.pas.gov.uk)

The purpose of this report – the Sustainability Scoping Report – is to identify the range of key local social, environmental and economic issues which affect Tower Hamlets. This is to ensure that the local plan policies do not exacerbate existing issues and meet the identified needs.

### **1.2.3 Related processes that sit outside the Sustainability Appraisal**

The following processes and assessments are requirements for assessing Local Plans, but sit outside of the Sustainability Appraisal.

#### **1.2.3.1 Equality Analysis**

An *Equality Analysis* (EA) is a requirement under the UK *Equality Act 2010* and *Public Sector Equality Duty*. It serves as a mechanism for ensuring that ‘due regard’ is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals.

It is a separate process to that of the Sustainability Appraisal, however given that there is some overlap of purposes, the Equality Analysis should be read in conjunction with this report.

An Equality Analysis Quality Assurance assessment has been undertaken on this Scoping Report. This indicates that a full Equality Analysis is not required at this stage. Instead steps will be taken to ensure that due regard for the nine protected characteristics are embedded in the Local Plan process and policies. A full Equality Impact Analysis will be undertaken on the Local Plan.

The Equality Analysis Quality Assurance assessment is attached as Appendix 3.

#### **1.2.3.2 Health Impact Assessment - London Plan**

A Health Impact Assessment (HIA) was also undertaken, as per the requirements of the London Plan. The HIA flags where there are gaps in data and where health as a cross-cutting issue can be incorporated across a number of thematic areas to support healthy communities. In summary, this report is structured to meet the requirements of the EU on Environmental Impact Assessment, associated regulations at the national level, and the findings of local processes and assessments.

Again, this is a separate process to that of the Sustainability Appraisal and is regulated by different legislation. Given the overlap of purposes, HIA findings have been incorporated into identifying sustainability issues relating to health in Appendix B and the Sustainability Appraisal Framework.

The Health Impact Assessment Screening is attached as Appendix 2E.

#### **1.2.1.1 Habitats Regulations Assessment**

The Local Plan may also require a Habitats Regulations Assessment (HRA) as set out in the Conservation of *Habitats and Species Regulations 2010*. A separate screening assessment was carried out that screened potential considerations and impacts that relate to the undertaking and implementation of the Local Plan in relation to European habitats and species. It concluded that a Habitats Regulation Assessment is not required at this stage, but an assessment should be undertaken to determine whether a Habitats Regulations Assessment may be required for future drafts of the plan. If a Habitats Regulations Assessment is required, the Sustainability Appraisal should incorporate this. Figure 1 highlights the differences of purpose and emphasis between the HRA, SEA, and Sustainability Appraisal.

	<b>Habitats Regulations Assessment</b>	<b>Strategic Environmental Assessment</b>	<b>Sustainability Appraisal</b>
Aim of process is to...	Maintain the integrity of the Natura 2000 network & its features	Provide for a high level of protection of the environment	Promote sustainable development
Emphasis of process is on...	Preventing development that could harm European sites	Providing information on environmental impacts, consultation, documenting decisions	Consideration (and where necessary balancing) of social, economic and environmental impacts
	'protection led'	'baseline led'	'objectives led'
Level of detail, quantification			

Figure 1: Differences of purpose between HRA, SEA and SA.  
Adapted from Source: <http://www.levett-therivel.co.uk/AAinE.htm>

### 1.3. Sustainability Appraisal Process

This stage and this report, define the scope of the rest of the Sustainability Appraisal. It sets the context, objectives and defines the scope of the overall Sustainability Appraisal, so that the Appraisal may be proportionate to the scope of the Local Plan. It does so through five sequential steps as follows.

- **Stage A1:** Relevant policies, plans and programmes are reviewed to scope and define preliminary sustainability objectives and indicators to be included in the Sustainability Appraisal framework.

- **Stage A2:** Existing information and data relating to these objectives and indicators is collated. This serves to provide a baseline against which positive and negative impacts may be assessed throughout the rest of the Sustainability Appraisal process. It also serves to highlight data gaps which may need to be addressed in gathering and updating the evidence base to carry out the Sustainability Appraisal. This step also provides an opportunity to test and refine the objectives and indicators identified in the previous step.
- **Stage A3:** Sustainability issues are identified from the work undertaken in the previous two steps. This serves to provide another level of refinement of sustainability objectives.
- **Stage A4:** Sustainability Appraisal Framework. The previous steps inform the framework. Sustainability objectives are tested for strategic compatibility with the SEA Directive, and tested for conflicts between objectives. Appropriate indicators and where applicable targets are identified which assist to measure progress towards objectives.
- **Stage A5:** Relevant consultation bodies are then consulted on the scope of the Sustainability Appraisal. The purpose of this is to ensure that the right level of detail and issues have been captured and are adequately reflected in the Framework. There are opportunities for wider consultation later in the Sustainability Appraisal process.

This initial stage sets the scene from which to then undertake the following stages of the Sustainability Appraisal process, which are beyond this report. These stages are:

- **Stage A (this report):** Establishing the context, defining objectives and scope, developing a framework for the Sustainability Appraisal.
- **Stage B:** Using the framework to assess the Local Plan policies. This will assess the policy effects and those of possible policy alternatives.
- **Stage C:** Preparing the Sustainability Appraisal report which occurs alongside preparing the Local Plan.
- **Stage D:** Consulting with relevant consultation bodies and the general public on the Sustainability Appraisal report, alongside the Local Plan consultation.
- **Stage E:** Reporting and monitoring after the Local Plan has been adopted.

Figure 2 on the following page illustrates these different stages and highlights how the Sustainability Appraisal process aligns with the different stages of developing and implementing the Local Plan.

SA Process			Local Plan Process
Stages			Stages
Stage A Scoping	Setting the context and objectives, establishing the baseline and deciding on the scope	Publish SA Scoping Report	Stage 1 Evidence gathering, engagement
Stage B Testing	Developing and refining the alternatives and assessing effects	Developing draft SA Report	Stage 2 Draft Local Plan
Stage C Developing	Preparing the SA report	Publish draft SA Report	
Stage D Publishing	Consulting on the draft DPDs and the SA report	Submit SA Report (final) as part of Evidence Base	Stage 3 Submission Stage 4 Examination Stage 5 Adoption
Stage E Monitoring	Monitoring the significant effects of implementing the DPDs		State 6 Monitoring

Figure 2: How the LBTH Sustainability Appraisal process ties in with the Local Plan Process (Source: LBTH, 2015).



## **2. Stage A1: Review of policies, plans and programmes**

### **2.1. Purpose**

This section identifies key environmental protection objectives established at the international, European Union Community, national, regional and local levels that are relevant to the Local Plan and scoping of the Sustainability Appraisal. It sets the basis for defining Sustainability Appraisal objectives, indicators and the framework.

This step is guided by the SEA Directive which stipulates that the SEA must cover:

*“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (Annex 1 (a)).*

*“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex 1 (e))*

### **2.2. Method**

The Local Plan and the Sustainability Appraisal/SEA must be framed in the context of international, EU Community, national, regional and local objectives that relate to sustainability and its environmental, economic and social dimensions. To do so, a comprehensive review of all relevant policies, plans and programmes was undertaken. This can be found in Appendix 2A: Review of Policies, Plans and Programmes. The summary of this review has been used as one input to inform the proposed Sustainability Appraisal objectives set out in the Sustainability Appraisal framework in Section 4.6.

The review has sought to ensure that the Sustainability Appraisal objectives do not conflict with the objectives of other relevant policies, plans and programmes. In doing so, it assists to highlight areas of potential conflict which will need to be addressed through modification and mitigation.

### **2.3. International and EU plans, policies and programmes**

The scope of this Sustainability Appraisal is framed by requirements already set in higher tier policies and programmes. From an international perspective these requirements are derived from international agreements and European Union Directives. In general, most of these agreements and directives have been

transposed into national legislative requirements and policies, however a number of European Directives still require consideration.

## 2.4. National plans, policies and programmes

The preparation of national plans, policies and programmes should be consistent with international policy and legislation, and EU Directives. A review of national plans can be found in Appendix 2A: Review of Policies, Plans and Programmes- National Plans and Programs.

A number of these are worth noting here as they heavily influence the direction of the Sustainability Appraisal objectives and Local Plan requirements.

The **UK Sustainable Development Strategy 2005** outlines the Government's overarching objective 'to raise the quality of life in our communities'. This is further defined as the follows. These should be incorporated into the objectives for the Sustainability Appraisal.

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

A **Practical Guide to the Strategic Environmental Assessment Directive** provides information and guidance on how to comply with the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment", known as the Strategic Environmental Assessment or SEA Directive. The Guide is intended to apply to all plans and programmes in the UK which fall within the scope of the Directive. Specific guidance has however been developed for certain types of plans and programmes, particularly land use and spatial planning and transport planning.

The **National Planning Policy Framework (NPPF)** brings together policies of various topics into a consolidated set of priorities under sustainable development. It needs to be addressed when making decisions and planning development. It works to ensure that planning decisions contribute to national priorities while also allowing for local decision-making that reflects local needs and priorities. National priorities include protecting the natural environment, minimising contributions to climate change and its effects, and supporting local growth.

NPPF Paragraph 152 is particularly relevant to defining sustainability objectives. It states that:

*"local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these*

*dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.”*

The **National Planning Policy Guidance** provides guidance on the use and interpretation of the NPPF and is also a material consideration for the preparation of a Local Plan and associated sustainability appraisal.

## **2.5. Regional and sub-regional plans, policies and programmes**

The scope of the Sustainability Appraisal is framed by requirements set in regional and sub-regional level plans which in turn should generally comply with those at international and national tiers. A full list of those reviewed and their relevant objectives and indicators can be found in Appendix 2A: Review of Policies, Plans and Programmes- Regional and Sub-Regional Plans and Programs.

The **Mayor’s London Plan (last updated March 2015)** which is the Spatial Development Strategy for Greater London is worth note. It sets out a regional vision and policies that cover housing, transport, employment and the environment amongst others. The Local Plan is bound to and will be tested against its general conformity and compliance with the London Plan.

## **2.6. Tower Hamlets plans, policies and programmes**

The **Core Strategy (2009)** along with **Managing Development DPD (2013)**, constituted Tower Hamlets’ Local Development Framework. The new Local Plan is replacing the existing Local Development Framework to reflect changes in national policies following the adoption of the NPPF, along with reflecting changes in the borough.

Similar to this Sustainability Appraisal of the Local Plan, the Core Strategy and **Managing Development** also underwent a Sustainability Appraisal during their preparation process. The Sustainability Objectives of this appraisal are listed below and form one strand of input into formulating the Sustainability Objectives for the new Local Plan in Appendix 2C: Method for developing the Sustainability Objectives.

Sustainability Objectives for the assessment of the Core Strategy 2009:

- To give all residents quality, affordable housing.
- To give all residents the opportunity of an occupation providing self-worth and good livelihood, particularly in deprived areas.
- To improve health, promote healthy lifestyles and reduce health inequalities.
- To create safe and secure environments and reduce crime.

- To reduce the need to travel, reduce private vehicular transport and encourage the use of public transport, cycling and walking.
- To combat fuel poverty, reduce energy consumption and promote renewable forms to reduce greenhouse gas emissions.
- To improve water quality and reduce water use.
- To conserve, enhance and where appropriate create species, habitats, green spaces and watercourse.
- To improve air quality.
- To minimise flood risk within the borough and elsewhere, and promote the use of sustainable urban drainage systems.
- To minimise waste requiring disposal and to increase recycling and recovery.
- To reduce the impact of noise.
- To promote good quality in urban design, and the conservation and appreciation of the historic environment.
- To create sustainable communities through the regeneration and efficient use of land and buildings with links to appropriate infrastructure.
- To provide accessible social and community facilities and open spaces.
- To reduce poverty and ensure equality of opportunity for all residents.
- To ensure that the plan does not negatively affect existing residents of Tower Hamlets, and particularly disempowered groups.

The Tower Hamlets' **Community Plan 2015** was published in September 2015. The principles and themes outlined in the Community Plan are highly relevant to the Sustainability Objectives and Local Plan. The Plan continues the principles of 'One Tower Hamlets' which are: equality, cohesion, and community leadership. The cross-cutting priorities of the plan are empowering residents and building resilience; promoting healthier lives; increasing employment; and responding to population growth.

## **2.7. Summary of Policy and Plan Objectives**

By reviewing the relevant International, National, Regional and Local policies and plans (provided in full in Appendix 2A), the following list of common objectives has been drawn.

This list forms one input, alongside the baseline information contained in Appendix 2B, into formulating the sustainability objectives. These inputs will be collated, combined and assessed, to create a comprehensive list of sustainability objectives in the Sustainability Appraisal Framework in Section 4.

This process is illustrated in Appendix 2C: Method for developing the Sustainability Objectives.

1. Place the public and community at the centre of planning processes and policy objectives.
2. Plan for and meet the challenges of population growth.
3. Foster trans-boundary cooperation and co-delivery of strategies and services to address issues where appropriate.

4. Improve the quality of life for all residents and reduce deprivation, including child poverty and fuel poverty.
5. Facilitate the development of a wide choice of housing tenures, sizes and affordability level that meet lifetime and energy efficiency standards and caters for all, including the need for specialist housing.
6. Protect human health and reduce health inequalities, through provision of adequate health facilities and by influencing the wider determinates of health.
7. Improve the safety and security of all, and promote community cohesion.
8. Improve access to community facilities, including leisure facilities.
9. Increase accessible open spaces that are high quality, connected, multi-functional and include spaces for play.
10. Promote accessible, safe and sustainable transport and reduce transport related contributions to climate change.
11. Ensure all school age residents have access to high quality and well-designed education facilities and improve access to early years provision, including childcare.
12. Increase opportunities for residents to get into training, access lifelong learning opportunities and acquire skills for employment to benefit from job opportunities.
13. Support a robust, low carbon and competitive economy that creates shared prosperity and helps all residents reach their full potential.
14. Support the vitality of diverse, inclusive and secure town centres and neighbourhoods.
15. Protect, conserve and enhance the historic environment, heritage assets and cultural heritage.
16. Promote inclusive and sustainable design and construction which contributes to a sense of place.
17. Minimise the borough's contribution to climate change and promote mitigation and adaptation measures to address the negative effects of climate change.
18. Promote energy security and increase the proportion of energy use from renewable sources.
19. Maintain biodiversity; conserve and enhance natural habitats, and landscapes of importance.
20. Encourage reduced and more efficient use of water.
21. Protect and manage the quality of water bodies, including groundwater.
22. Improve air quality.
23. Reduce and manage the risk of floods.
24. Reduce waste, enhance recycling and reuse, and promote sustainable waste management.
25. Avoid, prevent and reduce adverse effects to residents and nature of exposure to environmental noise.
26. Safeguard and enhance the quality of soil.
27. Promote development on previously developed land.

## **3. Stage A2 & A3 Baseline**

### **3.1 Purpose**

This section outlines the current environmental, social and economic conditions that may be affected by the Local Plan.

The baseline is guided by the SEA Directive which states that:

*“the environmental characteristics of areas likely to be significantly affected” (Annex 1 (c); and*

*“any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC” (Annex 1 (d)).*

The identification of issues is guided by the following SEA Directive.

*“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.” (Article 1)*

### **3.2 Method**

The baseline information was compiled from the review undertaken in Section 2, and in addition from national and local data sets. Data gaps were also identified.

Baseline information has been collected for the key borough characteristics identified in the SEA Directive and highlighted as of local importance through the policy review.

The baseline information, sustainability issues and data gaps can be found in Appendix 2B. Trends were also identified where possible. This information informs the Sustainability Appraisal Framework in three ways:

Firstly, the identification of current information and issues is one input into the development of sustainability objectives.

Secondly, it provides a baseline from which to assess the potential effects of alternative proposals for the Local Plan in the following stages of the Sustainability Appraisal (beyond this report).

Thirdly it provides a baseline for future monitoring (after the adoption of a new Local Plan).

### 3.3 Likely Future Trends

The Sustainability Appraisal considers the likely future environmental, economic and social conditions without a new Local Plan. This is to help establish a new baseline against which the possible impact of any new Local Plan policies can be assessed. For some aspects, this will be difficult to predict, however for other areas, where major national and regional changes are occurring, potential impacts can be identified and highlighted. The current understanding of future trends is provided below, but this will be further influenced as the evidence base is produced through the next stage of the Local Plan process.

#### Population Change:

According to the GLA's 2014 SHLAA population projections, the borough's population is projected to increase from 280,474 in 2014 to 364,804 in 2024, an increase of 23%. This large population growth will not be uniform across different elements of the population and will lead to changes in the demographics of our borough.

The projections show that the borough's population will increase across all of the age groups, but that the greatest increases will be amongst the older working age population (ages 35 to 64).

The increasing population will also create changes in the ethnicity of residents. The largest percentage increase will be in the 'other' category, which will increase by 49% from 10,600 in 2014 to 15,769 in 2024, reflecting that the borough will be home to an increasing number of residents from many more different countries, than is currently the case. The 'White' population is also due to increase by 33% over the next ten years, whilst the 'Bangladeshi' population is due to increase by a relatively smaller 16%.

The income profile of the borough is also changing. The borough has historically had high levels of unemployment, however this has been reducing steadily and is now at its highest ever level with 68.1% of residents in employment in February 2015. The borough is now only 3.7% behind the London average. However higher than average levels of unemployment remain amongst some groups of residents and in-work poverty remains. This is also influenced by the changing housing market and welfare provision, which influence who can afford to live in the borough.

Our current local plan did not envisage this level of population increase or change and a new Local Plan will have to consider how the needs of these diverse groups are met.

#### Housing Provision

The Council is in the process of producing a new Strategic Housing Market Assessment. Early indications suggest that despite building the highest number of homes and affordable homes in the Country, the Council will still need to produce a large number of homes, of which over half will need to be affordable and about half will need to be family homes.

The last ten years has seen a reduction in the percentage of residents living in social rented housing, a small level of growth in owner occupation and large growth in the private rented sector. This trend is likely to continue.

In addition the last 5 years have seen a range of changes to housing and welfare policy which will have had a significant impact on the borough's population and will continue to do so. Cumulatively the impact has been to change the income profiles of residents able to live in the borough. The borough is likely to become more polarised between an increasingly wealthy home owning group and a reducing group of residents living in social housing.

These trends are likely to be exacerbated through the Housing and Planning Bill which proposes significant changes to how affordable homes should be delivered as well as to the tenure of affordable homes. It places increasing emphasis on affordable home ownership, rather than rent, which will change the profile of residents able to access affordable housing. It also proposes an extension in the Right to Buy policy to housing association tenants, paid for by the sale of void 'high value' council homes. The Council is concerned that this will reduce the availability of social rented homes and further change the income profile of residents able to live in the borough.

Our current Local Plan did not envisage any of the housing or welfare policies policy changes currently in operation and a new Local Plan will have to address the resulting changing need and available provision.

#### Development Pressure

The borough has seen a consistently high level of developer interest since the production of the last Local Plan. This continued even during the recent 2008 recession.

Of the strategic sites identified in the last Local Plan the majority are already at some point within the planning process. The number of new strategic sites available for development in the borough is reducing, as reflected by the significantly lower number of sites identified through the recent Call for Sites process.

The reducing number of available sites is increasing land values and creating land use pressures. The current high values of residential development mean that other land uses, including employment space, community facilities and open space, will come under increasing pressure for conversion to housing provision and there will be a reduced amount of land available for additional provision of these uses.

More and more development will come forward on smaller and more contaminated or constrained sites, leading to denser development. There will also be increasing pressure to regenerate and densify existing developments.

Our current Local Plan does not envisage this level of growth and resulting land use pressure, nor the implications for existing land uses. A new Local Plan will be required to address these new challenges and provide policies which seek to direct growth and identify new sites for the provision of needed infrastructure.



## Cohesion Challenges

The large population changes and the fast pace of development means that the borough is changing extremely rapidly. This will be felt both through different groups of residents working and living in the borough and in new buildings and places.

The Council's One Tower Hamlets policy has been successful in promoting community cohesion throughout the borough. The borough's annual residents' survey records a yearly increase in the number of residents who think that people from different backgrounds get on well together. In the 2014-15 survey this is now at 81%. As the diversity and income differentiation in the borough increases, the Council will need to work harder with partners and residents to continue this positive trend.

Our current local plan includes policies to promote mixed communities, shared housing amenity and open access to public open space, however a new Local Plan may need to consider how to strengthen these policies.

Neighbourhood Planning has also become part of the planning system since the last Local Plan. This enables groups of residents to designate an area and develop planning policies for the area. A new Local Plan is required to incorporate the emerging neighbourhood plans, as well as to ensure that there are comprehensive planning policies which connect and unite the borough.

## Changes in the Economy and Employment

The borough is currently home to a huge range of businesses, many of which are large multinational companies. However the majority of businesses in Tower Hamlets are SMEs with fewer than ten employees.

Employment projections published by the GLA estimate the number of jobs in the borough will almost double, increasing by 169,000, between 2010 and 2031 to 379,000. This growth is higher than the growth projected for London.

The changing global economy, emerging employment sectors and working trends, including the rise of remote working and self-employment, will have an impact on the type of employment spaces required in the borough. In addition the growing value in residential development is increasing pressure on employment space for redevelopment into housing.

These changes are likely to create a very different pattern of development pressure to that envisaged in our current Local Plan. The new Local Plan will have to consider whether to continue to encourage employment uses within Tower Hamlets and if so, where, and what infrastructure, such as high speed broadband or shared workspace, will be required to support them.

## Town Centre Uses

Regionally there is increasing pressure to diversify Town Centre uses, especially well connected Town Centres, to deliver more high density housing.

The borough's population changes and new retail trends, including the increase in online shopping and the rise of smaller chain convenience stores, are also having an impact on the nature of town centres. Town centres are increasingly

moving away from only providing retail spaces to delivering spaces for leisure and cultural activities as well as service provision.

The changing shape of development in the borough will also influence the nature and location of our Town Centres, possibly reducing the demand for certain uses in some areas but also creating opportunities for new Town Centres in emerging growth areas.

Our existing Local Plan has a strong focus on Town Centres, with policies designed to improve their vitality and viability, but it did not envisage the changing growth areas and trends which a new Local Plan will have to consider.

### Connectivity and Transport Infrastructure

The borough's growth and connectivity is being enabled by the provision of strategic transport connections including Crossrail. However the rapid increase in growth will place a huge strain on existing transport infrastructure.

The new Housing Zone and Opportunity Area means that development space is being opened up on the eastern boundary of the borough. This area has suffered from low connectivity, especially across the borough boundary into Newham. This new development provides an opportunity for this to be improved, enabling the borough to become a gateway from central London to the east.

The current Local Plan does not plan for this level of growth and connectivity requirements. In addition the new growth areas require up to date infrastructure and connectivity planning, which our new Local Plan will have to plan for.

### Service Provision Changes

Since 2010 the national government has adopted a savings process which has reduced funding available for Local Government and has frozen spending on Health and Education. The current government has indicated that this is due to continue until at least 2018. However the local impact will be felt well into the future as it has already changed how many of these services are provided, with many public sector services seeking to merge services and reduce the number of buildings they operate from.

The education system has also changed following the introduction of Free Schools, which are not under Local Authority control and which follow a different system for their establishment. This has created uncertainty in our planning for schools places and how the Council delivers new schools.

Our existing Local Plan did not envisage the level of public sector change and our new plan will have to consider future delivery models for these services, which may influence their land use.

### Environmental Challenges

Parts of Tower Hamlets, particular around major roads have some of the poorest air quality levels in London. As development pressures increase and more constrained sites are brought forward either for new development or change of use, it is likely that residential development will increase near major roads.

The majority of the borough is located within a nationally designated Flood Zone. The areas within the highest flood zone risk are also the areas which have been identified as GLA opportunity areas which will experience growth in the next 10-15 years.

Carbon dioxide is the key greenhouse gas causing climate change. Whilst the government has delayed the delivery of zero carbon homes there remain significant drivers to reduce carbon emissions in line with the Mayor of London's objective of delivering a 60 per cent reduction in CO2 by 2025, and the 80% cut required under the 2008 Climate Change Act. Growth in population and employment is likely to make it challenging to reduce emissions, as will the increasing number of smaller households which tend to have higher per capita emissions.

As the borough increases in density, the likelihood of parts of the borough being subjected to the urban heat island effect increases.

Our existing Local Plan did not envisage the level of population and development growth and therefore did not make provision for the level of environmental impact. Our new Local Plan will have to consider these impacts and risks and ways of mitigating them.

### **3.4 Sustainability Issues**

The following highlights the key sustainability issues relevant to the Local Plan and these reflect the challenges and priorities set out in the Community Plan, 2015. The underlying evidence base which informs these issues is contained in Appendix 2B.

- **A Growing and Changing Population:** Tower Hamlets was the second fastest growing borough in England and Wales for the year 2013/14 (based on proportion). High growth is predicted to continue. The increasing population will also create changes in the age and ethnicity of residents. The largest percentage increase will be in the 'other' category, which will increase by 49% from 10,600 in 2014 to 15,769 in 2024, reflecting the increasing 'hyper diversity' of the borough. The biggest growing age group is of residents aged 35 to 64.
- **Increasing income inequality and enduring deprivation:** Tower Hamlets is one of the most relatively deprived areas in London and England for multiple deprivations. Since 2007, the borough has improved in its overall relative position in the country. However the proportion of children and older persons living in income deprived families is significantly high. In addition income inequality is high and increasing.
- **Relatively High Unemployment and Skills Gap:** Tower Hamlets is a major location for employment in London, attracting a large daytime population of employees. However there is a major skills gap between local residents and the jobs available, reflected in a rising but lower than London average employment level. The median income in the borough is also lower than the UK and London average, reflecting low average skill

levels. Fewer adult residents hold higher qualifications or any qualifications than the London average.

- **Varying economic strengths of local town centres:** Current vacancy rates in our town centres vary from around 1.25% to 15.5%. In addition levels of fast-food outlets, betting shops and payday loan stores are higher than ideal and have socio-economic and health implications. Town Centre uses are changing, with increasing cultural and social activities and a move away from traditional retail provision.
- **Undersupply of housing:** The Council is in the process of producing a new Strategic Housing Market Assessment. Early indications suggest the Council will need to produce a large number of homes, of which over half will need to be affordable and about half will need to be family homes, reflecting a current lack of both tenures. In 2015, there was a waiting list of 19,810 households on the Council's housing waiting list.
- **Overcrowding and lack of suitable homes:** Overcrowding is a major issue in the borough. According to the 2011 census, 32,235 households had too few rooms than what they required. This represented 34.8 per cent of all households in the borough.
- **Housing Affordability Gap:** Housing has been getting less affordable in the borough. This is reflected in both high sale and private rental values. Between 2010 and 2015 house prices rose by 46% from £341,900 to £499,060. The percentage of social housing stock is also reducing and affordable housing products are diversifying and becoming more expensive. The changes to welfare provision is limiting the ability of the low paid and unemployed to live in the borough.
- **Pressure on School Places:** The expected housing and population growth in the borough increase the need for school places. Current forecast is that there will be about 9,000 more 4-16 year olds needing a school place over the next 10 years. Over the extra capacity already planned for, that means the equivalent of 2-3 new primary schools. The growth in primary numbers in previous years is now feeding through to secondary schools and the borough will require 2-3 new secondary schools over the next 10 years. However fluctuating birth rates across London, as well as increasing family mobility, means that this figure will need regular revision.
- **Lack of Early Years / Childcare places:** In 2013 the Government introduced a new statutory duty on Councils to ensure adequate provision of 15 hours of childcare for disadvantaged two year olds. The borough's demographics mean that Tower Hamlets needs to provide the highest number of places. The Council is currently under providing by 1,398

places. In 2017 the duty will increase to 30 hours for disadvantaged 2 year olds and all 3 and 4 year olds, increasing the need to provide places.

- **High Health Inequalities:** Residents in the borough have lower life expectancies than average, but life expectancies are improving. There are significant health inequalities amongst residents in the borough. This is reflected in the variation of life expectancies between the most and least deprived residents. Tower Hamlets has higher than average premature death rates from cancer, respiratory disease and circulatory disease.
- **Poor Children's Health Indicators:** Children in Tower Hamlets have amongst the highest levels of obesity nationally as well as poor oral health. Vitamin D deficiency is also a concern amongst mothers and children. Lower than average percentages of children achieving a good level of development at the end of reception year at school is also a concern.
- **Relatively high levels of crime and concern about crime:** Whilst total crime figures and most crime types are reducing in the borough, the rate of crime is still higher than that for London and England. In addition residents reported crime as the top concern in Tower Hamlets and public confidence with the police is only at 60%.
- **Pressure on transport capacity:** There is a need to increase the current and future capacity on trains, underground, overground, DLR, buses and local roads. 'Pinch points' around the borough need to be addressed, particularly those identified in the Isle of Dogs. There is a need to further encourage active modes of transport, particularly for local trips. There is a need to address road space conflicts between cyclists, pedestrians and motorists. This is particularly pertinent for 'pinch points' which have been identified through modelling.
- **Lack of Open space:** Tower Hamlets has just over 232 hectares of open space which is 1.2 hectares per 1,000 residents. This is well below the National Playing Fields Standard of 2.4 hectares per 1,000. With increasing development creating new open space is a challenge.
- **Poor Air Quality:** Tower Hamlets produces the third highest level of total carbon dioxide emissions of the 33 Local Authorities in Greater London. Air pollution levels for the borough overall exceed targets set by the Government's Air Quality Strategy, 2014. Transport contributes to the majority of pollution in the borough. The close proximity of much of the borough to large arterial roads is of much concern, due to the impact on vulnerable groups such as children, the elderly and those with existing medical conditions. Air pollution has significant implications on health and life expectancy and is considered to be the second largest contributor to deaths after smoking.

- **Increasing rates of Fuel Poverty:** In 2013, 7.6% households in Tower Hamlets were estimated to be experiencing fuel poverty. This was an increase from the previous year, in which 7.3% of all households in the borough were estimated to be experiencing fuel poverty.
- **Rising Heat Island Effect:** London generates its own microclimate, known as the Urban Heat Island (UHI), which can result in the centre of London being up to 10°C warmer than the rural areas around London. The 2003 summer heatwave resulted in about 600 excess deaths in London. The hot temperatures in 2006 resulted in extremely high demands on London's power supply network and subsequent 'brown outs', due to the high cooling demand.
- **Low levels of biodiversity:** There are large areas in the borough which are considered to have deficient access to nature and biodiversity.
- **Low recycling rates:** The Council's recycling rates are below the London average, but rising steadily. The wet recycling rate is particularly low, which reflects the relatively small amount of garden waste produced, due to the nature of the housing stock. Whilst individual local authorities no longer have borough specific recycling targets, all local authorities are working towards 50% recycling rates (the National target).
- **Pressures on Waste Processing Capacity:** Our current safeguarded waste sites are both in areas transitioning away from industrial use and into residential use through their inclusion within the Poplar Riverside Housing Zone and the Fish Island area of the LLDC. The resulting increasing land values, as well as regional and local housing targets, creates pressure for alternative use for these sites.
- **Poor Water Quality:** For the 3 years between 2011/12 to 2013/14 the quality of the Lower Lea has remained unchanged. The quality of the water is reported as moderate, its chemical status is moderate and ecology is poor.
- **High level of flood risk, especially in areas of expected development:** A considerable proportion of the borough is within flood zones 2 and 3 (areas of highest risk). This includes those areas expected to accommodate high levels of development, including around the river Lea and Isle of Dogs. Over a third of Tower Hamlet's surface area is covered by buildings, roads and car. This high level of surface sealing exacerbates the risk of surface water level flooding. There is one critical drainage area identified in Tower Hamlets Plevna Street and Launch Street however the Isle of Dogs is also considered at risk from Surface Level Flooding, especially the potential to exceed the capacity of the drainage network.

- **High Noise Complaints:** The Chartered Institute of Environmental Health calculates the rate of noise complaints per thousand of population for all London boroughs. In 2013/14 in Tower Hamlets this was 22%, amongst the highest in London and above the London average of 17.4%.
- **Heritage under pressure from development:** High levels of development and associated drivers of land prices and population growth, place pressure on heritage conservation. This pressure is compounded by the borough's location on the city fringe which has a mass of tall buildings. The demand for development could result in less consideration to the impact of appropriate scale of new buildings on the wider area. The Tower of London is a UNESCO world heritage site, a status which could be threatened unless its surroundings are protected.
- **Emerging design issues:** Increasing development is raising issues around sunlight, daylight and wind effects. In addition the borough may wish to undertake local view assessments to understand whether there are local views which should be protected, in addition to those protected by the London Plan. Finally the opportunity areas in the borough are located in areas of high archaeological importance.

### 3.5 Data gaps and limitations

A list of specific data gaps for each factor can be found in Appendix 2B.

The baseline information collected highlights a general shortage of information to be able to fully assess the likely current and future state of the environment, as required by the SEA directives. This is further compounded by the interconnectedness of the drivers and effects of the factors. Where there are data gaps, this should be addressed in the following stages of the Local Plan evidence base where appropriate.

Another limitation that needs to be highlighted is the use of different data sets and the predominance of insufficient time to show a trend. The identification of trends overall is therefore a gap. These limitations are not specific to Tower Hamlets. Many authorities have data gaps. This is even more so given the context of rapid change which can make data sets that are a few years old, of little significance.

Much of the data is collected or collated by external bodies. Therefore, the London Borough of Tower Hamlets has little control over the temporal and spatial scope of the data and whether collection methods may change in the future, which would restrict reliable comparisons. It is important to recognise these limitations.

The use of indicators also presents certain limitations. Indicators do not explain why things have or are happening, and the secondary effects of those changes. Therefore, some caution must be taken in realising that the information collected around indicators may be a simplification of issues and their interactions.

Similarly, it may be a small component in what is required to meet the objective. Qualitative information will also be needed, and expert judgements may still need to be made in some circumstances.

Relevant baseline information will be updated during the SA process as and when new data is published. For example, following the completion of emerging technical reports on specific thematic areas.



## 4. Stage A4 Sustainability Appraisal Framework

### 4.1 Purpose

The Sustainability Appraisal Framework is central to the Sustainability Appraisal assessment process. The framework provides a way in which emerging policies can be assessed in terms of their likely sustainability effects.

### 4.2 Method

The objectives provide a list of locally defined objectives which describe what we as a borough would like to achieve with our new Local Plan.

The review of the plans, policies and programmes and the identification of key sustainability issues from the baseline information provide the information that is required to enable a set of SA objectives to be formulated. Appendix 2C shows the inputs and process of developing the Sustainability Objectives.

The framework will be used to complete the final sustainability appraisal of the Local Plan policies. Against each objective is a set of questions which are designed to assess the emerging policies. Where it is considered that the policy will make a noticeable contribution to the achievement of the objective, through a positive response to the prompt questions, a significant positive effect will be recorded. Where it is considered that the policy will make will materially hinder achievement of the objective, through a negative response to the prompt questions, a significant negative effect will be recorded. Where it is considered that the policy will not have a significant effect on the objective, through a neutral response to the prompt questions, a significant neutral effect will be recorded.

The nature of the effect will be described in accordance with the SA Regulations. Reference to baseline information will be made where available to justify the effect recorded, but in some instances an element of professional judgement may be required.

It should also be noted that sustainability objectives are separate from the evolving Local Plan objectives; although the two processes influence each other and there may be some overlap of objectives in terms of key local issues.

### 4.3 Sustainability Objectives

1. **Equality:** Reduce poverty and social exclusion and promote equality for all communities.
2. **Liveability:** Promote liveable, safe, high quality neighbourhoods with good quality services

3. **Health and wellbeing:** Improve the health and wellbeing of the population and reduce health inequalities.
4. **Housing:** Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.
5. **Transport and mobility:** Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.
6. **Education:** Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.
7. **Employment:** Reduce worklessness and increase employment opportunities for all residents
8. **Economic Growth:** Create and sustain local economic growth across a range of sectors and business sizes.
9. **Town Centres:** Promote diverse and economically thriving town centres.
10. **Design and Heritage:** Enhance and protect heritage and cultural assets; distinctive character and an attractive built environment.
11. **Open space:** Enhance and increase open spaces that are high quality, networked and multi-functional.
12. **Climate change:** Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.
13. **Biodiversity:** Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.
14. **Natural Resources:** Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.
15. **Flood risk reduction and management:** To minimise and manage the risk of flooding
16. **Contaminated Land:** Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.

## 1.1 How Sustainability Objectives meet the requirements of the SEA Directive

The above SA objectives have been assessed to ensure that suitable balance is provided between the three elements of sustainability: environment, economy, social.

Table 1 shows how the Sustainability Objectives meet the requirements of the SEA Directive. Each Sustainability Objective has been assessed as to which SEA Directive dimensions it may assist to address.

SEA Directive issue	Sustainability Objectives
Biodiversity	11, 12, 13
Population	1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 14
Human health	1, 2, 3, 4, 5, 6, 7, 8, 11, 12, 14
Fauna	13, 15
Flora	13, 15

Soil	11, 13, 15, 16
Water	11, 13, 15
Air	6, 12, 14
Climatic factors	1, 3, 6, 9, 10, 11, 12, 13, 14, 15
Material assets	2, 10
Cultural heritage	10
Landscape	11, 13, 16

**Table 1: Relation of Sustainability Objectives to the SEA Directive's issues**

## 1.2 Compatibility between objectives

As mentioned previously, conflicts may exist between objectives and what they aim to achieve. Appendix 2D shows the compatibility and potential conflicts between the Sustainability Objectives. The potential conflicts which the matrix in Appendix 2D highlights are as follows.

Housing and:

- biodiversity,
- water resources and use,
- water bodies,
- air quality,
- flood risk and management,
- waste,
- noise,
- soil,
- heritage and
- open space.

The potential for conflicts between achieving the housing objective and the above objectives rests upon the way in which planning for housing will occur and ensuring that housing is delivered in a sustainable manner. These are matters that the Local Plan will need to address.

There are also potential for conflicts between

- economy and employment; and :
- noise,
- soil,
- heritage and
- open space.

The potential for conflicts in achieving the economy and employment objective and the objectives above may arise particularly around the prioritisation of space and land to meet different objectives. This is a particularly pertinent issue in Tower Hamlets where available space and land is minimal.

Highlighting these potential inconsistencies between different Sustainability Objectives allows the framework to try to balance these issues, or determine where the priorities should lie. Where possible, a win-win or compromise situation should be sought. However if a compromise is not possible, trade-offs may be required which should be documented and transparent

### 1.3 Sustainability Appraisal Framework

The following Sustainability Appraisal Framework sets out indicators and targets, where applicable, with which to measure the sustainability of the Local Plan.

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
<b>1. Equality:</b> Reduce poverty and social exclusion and promote equality for all communities.	Will the Strategy / Policy... <ul style="list-style-type: none"> <li>Reduce poverty and social exclusion?</li> <li>Promote social cohesion and integration?</li> <li>Promote equity between population groups?</li> <li>Reduce fuel poverty?</li> </ul>	<ul style="list-style-type: none"> <li>Improve the borough's relative ranking for indices of multiple deprivations (IMD).</li> <li>Reduce the percentage of children living in income deprived households.</li> <li>Reduce the percentage of older persons (aged 65 and over) living in income deprived households.</li> <li>Reduce the number of households in fuel poverty.</li> <li>Increase the percentage of residents who feel that people from different backgrounds get along.</li> </ul>	English Indices of Deprivation 2010; LBTH Indices of Deprivation Summary 2011; 80:20 pay ratio (London's Poverty Profile, 2014); Public Health Outcomes Framework; Tower Hamlets Annual Residents Survey 2015
<b>2. Liveability:</b> Promote liveable, safe, high quality neighbourhoods with good quality services	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>Improve access for all residents to services, facilities and amenities near their home? Such as schools, early years provision, council</li> </ul>	<ul style="list-style-type: none"> <li>Increase the number of school places including places for child care and early education, in line with pupil place projections.</li> <li>Provide increases in infrastructure in line with the</li> </ul>	LBTH Annual Pupil Place Planning; the LBTH Leisure Strategy; LBTH Idea Store Strategy; LBTH

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
	<p>services, libraries and idea stores, community and faith facilities, leisure centres, open space and play areas and neighbourhood shops</p> <ul style="list-style-type: none"> <li>• Ensure appropriate infrastructure is delivered alongside development, including transport and utilities.</li> <li>• Promote high quality public realm?</li> <li>• Reduce the impacts of noise, vibration and pollution on public realm?</li> <li>• Reduce opportunities to commit crime and anti-social behaviour?</li> <li>• Improve perceptions of safety and reduce the fear of crime?</li> </ul>	<p>Leisure Strategy, Idea Store Strategy and Open Space Strategy.</p> <ul style="list-style-type: none"> <li>• Increase the number and quality of play spaces</li> <li>• Improve the number of residents who consider Tower Hamlets a good place to live.</li> <li>• Reduce rate of noise complaints</li> <li>• Reduce crowding on rail services</li> <li>• reduce 'excess wait time' on buses</li> <li>• reduce traffic delay</li> <li>• Reduce the crime rates per 1,000 people.</li> <li>• Reduce in the proportion of people who perceive crime as a top personal concern</li> </ul>	<p>Open Space Strategy; LBTH ARS, 2015; Public Health Outcomes Framework; Office of National Statistics Local Profiles; Tower Hamlets Annual Residents Survey 2015</p>
<p><b>3. Health and wellbeing:</b> Improve the health and wellbeing of the population and reduce health inequalities.</p>	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Protect and enhance access to an adequate level of provision of health / leisure / community/ open space facilities?</li> <li>• Improve mental and physical health and wellbeing?</li> <li>• Reduce proliferation of activities with negative health externalities?</li> <li>• Reduce health inequalities?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase healthy life expectancy.</li> <li>• Increase proportion of children who achieve a good standard of development</li> <li>• Increase participation rates in sport and recreation.</li> <li>• Reduce levels of excess weight among children and adults.</li> <li>• Reduce the number of excess</li> </ul>	<p>Life expectancy of women and men; Mortality rates; Sport England Active People Survey; CLG Indices of Deprivation; LBTH JSNA 2015; Public Health Outcomes Framework; Tower</p>

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
		<p>winter deaths</p> <ul style="list-style-type: none"> <li>• Increase levels of social inclusion (proxy measure: % of adult carers who have as much social contact as they would like).</li> <li>• Reduce the number of people who experience common mental health disorders</li> </ul>	Hamlets mental health strategy and JSNA, 2013
<p><b>4. Housing:</b> Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.</p>	<p>Will the Strategy /Policy...</p> <ul style="list-style-type: none"> <li>• Increase access to good housing?</li> <li>• Meet good housing design standards, including for energy and heat efficiency?</li> <li>• Increase mix of housing types and sizes?</li> <li>• Create opportunities for providing specialist and supported housing</li> <li>• Protect or increase levels of affordable housing?</li> </ul>	<ul style="list-style-type: none"> <li>• Provide 3,931 additional units in LBTH by 2035 (GLA SMHA, 2013)</li> <li>• Contribute to meeting the need for affordable and family housing, as identified in the latest Strategic Housing Assessment.</li> <li>• All new housing developments to meet EU target of near zero energy buildings by 2020</li> <li>• Reduce rate of statutory overcrowding</li> </ul>	LBTH Housing Needs Assessment 2014 (interim findings - draft); GLA SMHA, 2013;
<p><b>5. Transport and mobility:</b> Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p>	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Improve connectivity both within the borough and to neighbouring boroughs and wider London?</li> <li>• Encourage a shift to more sustainable forms of travel and away from private vehicle use?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase cycling network and support to increase share of all trips made by bicycle.</li> <li>• Enhance mode split in favour of active transport, and secondly public transport.</li> <li>• Meet Mayor of London's Transport Plan targets for mode split.</li> </ul>	LBTH Health Profile, 2014; LBTH Cycle Strategy, 2015; LBTH LIP

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
	<ul style="list-style-type: none"> <li>• Link new development with sustainable transport provision?</li> <li>• Increase transport efficiency?</li> <li>• Improve safety of the transport network?</li> <li>• Improve accessibility of the transport network?</li> <li>• Enhance capacity of the transport network?</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction in the vehicle (miles / km) travelled per person per year?</li> <li>• Mode Share Increase the percentage of journeys made by means other than the car.</li> <li>• Reduce the percentage of Principal Road Network where maintenance should be considered.</li> <li>• Reduce the number of persons killed and seriously injured on roads within the borough.</li> <li>• Reduce the total number of casualties from road traffic accidents within the borough.</li> <li>• Reduce CO2 emissions from ground based transport.</li> <li>• Reduce crowding on rail services</li> <li>• reduce 'excess wait time' on buses</li> <li>• reduce traffic delay</li> </ul>	
<p><b>6. Education:</b> Increase and improve the provision of and access to childcare, education and training facilities</p>	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Improve opportunities and facilities for formal, informal and vocational learning for all ages?</li> <li>• Support the Local Authority to fulfil its statutory duties for provision of school places and childcare places?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase the number of school places, in line with pupil place projections.</li> <li>• Increase the number of early education and child care places in line with population projections</li> <li>• Reduce the proportion of 16-18 years olds not in education,</li> </ul>	<p>Department for Education; Office for National Statistics in NOMIS; Labour Market Survey, 2014; CLG Indices of Deprivation, 2010; Office for National</p>



Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
and opportunities for all age groups and sectors of the local population.	<ul style="list-style-type: none"> <li>Contribute to upskilling and meeting the skills gap?</li> </ul>	<p>employment or training.</p> <ul style="list-style-type: none"> <li>Increase the proportion of residents who attain an NVQ Level Four or higher.</li> <li>Reduce current deprivation score for education and skills.</li> <li>Reduce the proportion of residents with no qualifications.</li> </ul>	Statistics, in NOMIS Labour Market Survey, 2014.
<b>7. Employment:</b> Reduce worklessness and Increase employment opportunities for all residents	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>Improve access to employment, especially for local people?</li> <li>Tackle barriers to employment, such as affordable childcare and skill levels?</li> <li>Improve access to employment for those groups currently experiencing above average worklessness, including BME women.</li> </ul>	<ul style="list-style-type: none"> <li>Increase proportion of residents who are employed.</li> <li>Reduce worklessness amongst high priority groups</li> <li>Increase number of jobs available to borough residents.</li> <li>Reduce the employment rate gap between Tower Hamlets and London</li> <li>Increase the median wage of residents</li> </ul>	BRES, 2012 in LBTH, 2014; NOMIS-Official Labour Market Statistics Local Authority Profile- Tower Hamlets, 2014.
<b>8. Economic Growth:</b> Create and sustain local economic growth across a range of sectors and business sizes.	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>Improve the resilience of local businesses and local economy?</li> <li>Support a range of business types and sizes?</li> <li>Stimulate regeneration and support employment opportunities for the borough's residents, particularly those in deprived areas?</li> <li>Provide the infrastructure and workspace required for new and</li> </ul>	<ul style="list-style-type: none"> <li>Retain office and employment space.</li> <li>Measure business use conversion to other uses.</li> <li>Increase number and range of businesses operating in the borough</li> </ul>	Emerging Evidence Base for Economic Growth Strategy

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
	existing businesses?		
<b>9. Town Centres:</b> Promote diverse and economically thriving town centres.	<ul style="list-style-type: none"> <li>Support the vitality of diverse town centres that serves the needs and wellbeing of residents?</li> <li>Promote the correct locations for different town centre designations, which take into account future growth scenarios?</li> </ul>	<ul style="list-style-type: none"> <li>Reduce the town centre retail unit vacancy rates.</li> </ul>	Town centre vacancy rates reported in LBTH, Annual Monitoring Report, 2013;
<b>10. Design and Heritage:</b> Enhance and protect heritage and cultural assets; distinctive character and an attractive built environment.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>Protect sites, features and areas of historical, archaeological and cultural value and their setting?</li> <li>Conserve townscape and neighbourhood character?</li> <li>Promote high quality architecture and design?</li> <li>Promote location sensitive density and design?</li> <li>Protect valued local views?</li> <li>Protect and enhance cultural assets and spaces for cultural activities?</li> <li>Help achieve a planned and aesthetically balanced skyline as seen in protected views</li> </ul>	<ul style="list-style-type: none"> <li>Achieve a reduction in the number of entries on the Heritage at Risk register.</li> <li>Protect historic buildings, including listed buildings, buildings on the local list and areas and buildings in the conservation strategy.</li> </ul>	Historic England's Heritage at Risk Register.
<b>11. Open space:</b> Enhance and increase open	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>Contributes to meeting the increasing need for open space?</li> <li>Link existing open spaces?</li> </ul>	<ul style="list-style-type: none"> <li>Increase the number of eligible open spaces managed to Green Flag standards.</li> <li>Increase the amount of all types</li> </ul>	LBTH website and Green Flag Award website; Open space (hectares) per 1,000

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
spaces that are high quality, networked and multi-functional.	<ul style="list-style-type: none"> <li>• Provide open space in areas of scarcity?</li> <li>• Improve the quality of open space?</li> <li>• Protect or improve public accessibility of open space now and in the future?</li> </ul>	of public open space (green, hard, play, sports etc)	people (LBTH, AMR 2012/13)
<p><b>12. Climate change:</b> Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</p>	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Support the delivery of developments with a reduced need for energy?</li> <li>• Reduce emission of greenhouse gases?</li> <li>• Increase the proportion of energy generated from renewable sources?</li> <li>• Increase the number of district energy systems (combined heat and power)?</li> <li>• Reduce fuel poverty?</li> <li>• Reduce impact of climate change, including flooding and urban heat island effect?</li> <li>• Ensure new and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change?</li> <li>• Promote construction?</li> <li>• Deliver development in accessible locations and robust transport infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce energy consumption across all sectors, including consumption of domestic electricity.</li> <li>• Reduce carbon emissions.</li> <li>• Reduce energy consumption across all sectors, including consumption of domestic electricity.</li> <li>• Reduce carbon emissions.</li> <li>• Support EU target for near zero energy buildings for 2020</li> <li>• Support GLA target for delivery of district energy systems.</li> <li>• Support national target of reducing carbon emissions by at least 80% by 2050.</li> <li>• Support London's CO2 emissions reduction target of 60% of 1990 levels by 2025</li> <li>• Improvements in the energy efficiency ratings for buildings (residential and non-residential)</li> <li>• Ensure that a significant</li> </ul>	<p>Neighbourhood Statistics, ONS, 2013; Fuel poverty sub-regional statistics; Department of Energy and Climate Change; UK Carbon Plan; Low Income High Cost (LIHC) indicator (DECC 2013). Energy Performance of Buildings Directive 2010/31/EU; Mayor of London climate change and mitigation and energy strategy 2011</p>

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
		proportion of the energy supply of new development is gained on-site and from a renewable source and/or from a decentralised, renewable or low-carbon, source	
<b>13. Biodiversity:</b> Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Conserve and enhance diverse and varied habitats?</li> <li>• Improve connectivity between wildlife sites?</li> <li>• Integrate further biodiversity provision within new developments?</li> <li>• Improve people's access to nature?</li> </ul>	<ul style="list-style-type: none"> <li>• Increase wildlife habitats</li> <li>• Protect European, national and locally designated sites</li> </ul>	Mayor of London's Biodiversity Strategy, 2002 Tower Hamlets Biodiversity Strategy 2014
<b>14. Natural Resources:</b> Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	Will the Strategy/Policy... <ul style="list-style-type: none"> <li>• Improve water quality, reduce piped water use and reduce waste water?</li> <li>• Minimise the production of waste across all sectors and increase reuse, recycling, remanufacturing and recovery rates?</li> <li>• Make appropriate provision for waste management facilities to meet the London Plan apportionment target?</li> <li>• Maintain or improve soil quality?</li> <li>• Promote development on brownfield sites?</li> </ul>	<ul style="list-style-type: none"> <li>• Improve the biological river quality</li> <li>• Minimise waste and increase rates of reuse and recycling in line with DEFRA and EU standards</li> <li>• Reduce residual household waste per a household</li> <li>• Increase waste sent for refuse, recycling or composting</li> <li>• Make improvements to air quality in line with UK Air Quality Strategy requirements.</li> <li>• Reduce the number of air quality hotspots.</li> </ul>	LBTH AMR, 2013/14; ONS, 2013; European Waste Framework Directive 2008; Defra, 2007; TH Contaminated Land Strategy 2013; UK Air Quality Strategy London Air Quality Network LBTH, Clear Zone Plan, 2010; TH Air Quality Action Plan 2003.

Sustainability Objective	Appraisal prompt questions	Indicators / Targets	Reference
	<ul style="list-style-type: none"> <li>• Help protect residents from existing poor air quality?</li> <li>• Reduce emissions of Nitrogen Dioxide/Particulate matter PM10?</li> <li>• Contribute towards achieving national and international standards for air quality?</li> </ul>		
<p><b>15. Flood risk reduction and management:</b> To minimise and manage the risk of flooding</p>	<p>Will the Strategy/Policy...</p> <ul style="list-style-type: none"> <li>• Minimise the risk of all types of flooding to people and property?</li> <li>• Promote the use of sustainable urban drainage systems.</li> <li>• Ensure developers reduce Surface Water Runoff Rates ( with stricter requirements in Critical Drainage Areas?</li> <li>• Incorporate the EA TE2100 PLAN?</li> </ul>	<ul style="list-style-type: none"> <li>• Not grant planning permission when contrary to Environment Agency advice on flooding and water quality grounds</li> <li>• Increase the number of sustainable urban drainage systems in the borough</li> <li>• All Developments Reduce surface water runoff in line with London Plan</li> <li>• Safe guard corridors of land along existing defence walls.</li> <li>• Improve the Riverside and flood defences.</li> </ul>	<p>LBTH AMR 2013/14; Environment Agency TE2100 Plan;</p>
<p><b>16. Contaminated Land:</b> Improve land quality and ensure mitigation of adverse effects of contaminated land on human</p>	<ul style="list-style-type: none"> <li>• Maintain or improve soil quality?</li> <li>• Ensure mitigation of adverse effects of contaminated land on human health?</li> <li>• Promote development on brownfield sites?</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce the amount of contaminated soil</li> </ul>	<p>TH Contaminated Land Strategy 2013;</p>

<b>Sustainability Objective</b>	<b>Appraisal prompt questions</b>	<b>Indicators / Targets</b>	<b>Reference</b>
health.			

## 5. Stage A5 Consultation and Next Steps

Consultation on this document will take place alongside consultation on the Local Plan Engagement document “Our Borough, Our Plan: A New Local Plan First Steps”.

The purpose of the consultation is to gain approval on the scope and level of detail of information. The consultation feedback, as well as further research and the completion of emerging technical reports on specific thematic areas, will be used to further update the scoping report, before it is finalised.

This is stipulated by Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004. This regulation also defines which organisations should be consulted in this stage of the Appraisal. This is based on the organisations’ environmental responsibilities. These organisations are:

- The Environment Agency
- Natural England
- English Heritage

Comments from these agencies, as well as other interested organisations and residents are also welcomed.

Consultation at this stage will help to make sure that the SA will be as comprehensive and robust as possible and meet statutory requirements. It is available for consultation for a period of five weeks in order to comply with the SEA Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004, 12(6)).

In seeking comments on this report, we have asked consultees to consider the following questions:

1. Is the document clearly structured and understandable?
2. Is the review at Appendix 2A of plans and policies sufficient? Are there any other relevant plans and policies that should be taken into account? Are any of the plans or policies outdated or superseded?
3. Is the range of baseline information at Appendix 2B appropriate and/or are there any further baseline indicators that might provide useful information and where might they be sourced?
4. Do you consider that the main sustainability issues have been correctly identified and highlighted?

5. Do you consider that these proposed SA objectives, prompt questions and targets are sufficient and reflect the key sustainability issues?

Comments should be sent to:

Strategic Planning – Plan Making Team  
London Borough of Tower Hamlets  
Town Hall  
Mulberry Place  
PO Box 55739  
5 Clove Crescent  
London  
E14 2BG

Or emailed to: [planmaking@towerhamlets.gov.uk](mailto:planmaking@towerhamlets.gov.uk)

Responses from the consultees will be addressed in subsequent stages of the Sustainability Appraisal process.



# References

## Sustainability Appraisal and Strategic Environmental Assessment

### *LBTH Sources:*

- Sustainability Appraisal for the Core Strategy 2006 (Proposed Submission Document)  
<http://modern.gov.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=12837>
- Strategic Environmental Assessment Scoping Report for South Quay Masterplan (Sept 2014). (Prepared by Land Use Consulting)  
[http://www.towerhamlets.gov.uk/pdf/5815\\_18\\_SouthQuayMasterplan\\_SEA\\_Scoping\\_Report\\_20140911.pdf](http://www.towerhamlets.gov.uk/pdf/5815_18_SouthQuayMasterplan_SEA_Scoping_Report_20140911.pdf)

### *Other:*

- A Practical Guide to the Strategic Environmental Assessment Directive  
[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)
- Implementation of Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment “the European Commission guidance”  
[www.europa.eu.int/comm/environment/eia/030923\\_sea\\_guidance.pdf](http://www.europa.eu.int/comm/environment/eia/030923_sea_guidance.pdf)
- UK Sustainable Development Strategy: Securing the Future (2005) and the UK’s Shared Framework for Sustainable Development, One Future – Different Paths (2005)

## 1. Population

### *LBTH Sources:*

- *LBTH Borough Profile website<sup>2</sup>: Population Key Facts Tower Hamlets 2013.*
- *LBTH Planning for Population Growth and Change Baseline Report 2009*

### *Other:*

- ONS. (2014). 2012-based Subnational Population Projections for England. Available at [http://www.ons.gov.uk/ons/dcp171778\\_363912.pdf](http://www.ons.gov.uk/ons/dcp171778_363912.pdf)
- ONS 2012 MYE
- ONS Census 2011

## 2. Equality

### *LBTH Sources:*

- *LBTH Indices of Deprivation Summary, 2011*
- *The Poverty Premium, Toynbee Hall, 2014*
- *Equality Impact Assessment scoping report, 2015*

## 3. Housing

<sup>2</sup> [http://www.towerhamlets.gov.uk/lgs/901-950/916\\_borough\\_statistics.aspx](http://www.towerhamlets.gov.uk/lgs/901-950/916_borough_statistics.aspx)

*LBTH Sources:*

- Affordable Housing Viability Report 2009
- Affordable Rent Programme 2011-2015
- Central Area Property Study 2007
- Criteria for Gypsies and Travellers Report 2009
- Five Year Supply of Deliverable Housing Sites 2013-2018.
- Homelessness Statement 2013-17
- Inner East London Broad Rental Market Area (BRMA)
- Managing Travellers Accommodation Report 2009
- New Housing Survey 2008
- Older Person Housing Statement 2013-2015
- Overcrowding and Under Occupation Statement 2013-2015
- Private rental market and house price trends in Tower Hamlets June 2013
- Student Accommodation Report 2009

*Other:*

- English Housing Survey 2014 (published February 2015)
- GLA Further Alterations to the London Plan (last updated March 2015)
- GLA Strategic Housing Market Assessment, 2013

#### **4. Economy and Employment**

*LBTH Sources:*

- Creative and Cultural Industries Report 2006
- Employment Land Study 2009
- Spatial Economy Study (amended 2011)
- Retail and Leisure Capacity Study 2009
- Small & Medium Office and Workspace Study 2006
- Live Work Report 2006
- Industrial Land Study 2006
- Aldgate Commercial Land and Property Study 2007
- Local Employment by Industries Research Brief 2014.
- Local Economic Assessment 2010
- Household income in Tower Hamlets, 2014

*Other:*

- NOMIS-Official Labour Market Statistics Local Authority Profile-Tower Hamlets available at:  
<https://www.nomisweb.co.uk/reports/lmp/la/1946157257/report.aspx?town=tower hamlets#tabempunemp>

#### **5. Education**

*LBTH Sources*

- LBTH Primary School Site Selection and Summary Table

*Other:*

- NOMIS Labour Market Survey, 2014
- ONS Annual Population Survey

#### **6. Safety**

#### *LBTH Sources*

- TNS-BMRB, Tower Hamlets Annual Residents Survey 2014

#### *Other:*

- Office for National Statistics Local Profiles
- Indices of Deprivation for England 2010

## **7. Health and wellbeing**

#### *LBTH Sources:*

- Planning for a healthier urban environment in Tower Hamlets, 2011 (summary and technical)
- Improving health and Well-Being Strategy
- Healthy High Streets [date?]
- Joint Strategic Needs Assessment: Life and Health in Tower Hamlets (July 2015, Tower Hamlets JSNA Reference Group).
- Tower Hamlets mental health strategy and JSNA, 2013

#### *Other authorities:*

- Air Quality in Tower Hamlets, A guide for public health professionals (Mayor of London, 2013)
- Impact of the Redevelopment of Raven Row on the Mental Well-being of the Local Community in Whitechapel, Tony Coggins and Susan Biddle, September 2014.
- Rapid Health Impact Assessment Tool, HUDU, June 2015 (2<sup>nd</sup> Ed.).
- Transforming Services Together (NHS)
- Understanding the Health Impacts of Air Pollution in London, King's College London for Transport for London and the Greater London Authority, July 2015.
- Public England. (2014). *Health Profile 2014 for Tower Hamlets*.
- Public Health Outcomes Framework <http://www.phoutcomes.info/public-health-outcomes-framework#page/3/gid/1000041/pat/6/par/E12000007/ati/102/are/E09000030/iid/90638/age/1/sex/4>

## **8. Air Quality**

#### *LBTH Sources:*

- Safer Communities: Air Quality Action Plan 2014-2018
- Clear Zone Plan 2010
- Tower Hamlets Air Quality Action Plan 2003

#### *Other authorities:*

- King's College London. London air quality network. <http://www.londonair.org.uk/LondonAir/Default.aspx>
- Defra. UK Air Quality Strategy 2007

## **9. Energy and Climate change**

*LBTH Sources:*

- Heat Map Study Report
- Climate Change Mitigation and Adaptation Report 2009
- Sustainable Energy and enhanced Biodiversity Report 2007
- The Hills Fuel Poverty Review 2012

*Other authorities:*

- Department of Energy and Climate Change. *Fuel poverty sub-regional statistics 2010-2013*, available at:  
<https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics>

## **10. Transport and mobility**

*LBTH Sources:*

- *Clear Zone Plan 2010*
- *Cycling Plan, 2009 (currently being updated as of 2015)*
- *Walking Plan*
- *Parking Stress Study*
- *Review of Car and Cycle Parking Standards*
- *Public Transport Capacity Assessment P1 and 2*
- *Transport and Utilities Baseline Review*
- *Road Safety (forthcoming)*

## **11. Biodiversity**

*LBTH Sources:*

- *Biodiversity Action Plan, 2014-2019* <http://www.towerhabitats.org/your-habitats/biodiversity-action-plan.htm>
- Biodiversity Website.  
[http://www.towerhamlets.gov.uk/ignl/environment\\_and\\_planning/sustainability/biodiversity.aspx](http://www.towerhamlets.gov.uk/ignl/environment_and_planning/sustainability/biodiversity.aspx)

*Other:*

- UK SAC Data Spread sheet available at <http://jncc.defra.gov.uk/page-1461>

## **12. Soil**

*LBTH Sources:*

- *Biodiversity Action Plan, 2014-2019* <http://www.towerhabitats.org/your-habitats/biodiversity-action-plan.htm>
- 2013 Tower Hamlets Contaminated Land Strategy

*Other:*

- European Environment Agency. *Map of soil sealing in London.* [http://www.eea.europa.eu/data-and-maps/figures/soil-sealing-in-the-capitals/london-eps-file/image\\_large](http://www.eea.europa.eu/data-and-maps/figures/soil-sealing-in-the-capitals/london-eps-file/image_large)

## **13. Flood risk reduction and management**

*LBTH Sources:*

- Flood Risk and the Core Strategy- General Sequential Test (CS)
- Strategic Flood Risk Assessment (SFRA) Level 1 (2009)
- Surface Water Management Plan (2011)

*Other:*

- <http://rsta.royalsocietypublishing.org/content/363/1831/1455>
- Flood risk assessment: local planning authorities  
<https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities>

## **14. Water resources and use**

*LBTH Sources:*

- Annual Monitoring Report 2013/14

## **15. Waste**

*LBTH Sources:*

- *Waste Evidence Base Report Update*

## **16. Noise**

No sources identified.

## **17. Town Centres**

*LBTH Sources:*

- Town Centre Policy Development Report
- Town Centre Boundaries and Balance of Uses Review
- Town Centre Spatial Strategy to 2025 (2009)
- Borough Portrait for the Town Centre Spatial Strategy
- Tackling the takeaways: A new policy to address fast-food outlets in Tower Hamlets
- Emerging Evidence Base for Economic Growth Strategy

## **18. Heritage**

*LBTH Sources:*

- Blackwall and Poplar Connections Public Realm Study
- Character Area Assessment
- Urban Structure and Characterisation Study 2009
- Conservation Strategy (check when last updated)
- LBTH Local List (War Memorials) available via LBTH Conservation website
- LBTH Local List (Other Buildings) available via LBTH Conservation website
- LBTH Archaeological Sites Interactive Map available via LBTH Conservation website
- Scheduled Achievement Monuments (SAMs) via LBTH Conservation website

## **19. Open Space**

*LBTH Sources:*

- Open Space Strategy 2006-2016
- Green Grid Strategy Map
- Green Grid Baseline Report

**20. Trans-boundary matters**

No sources identified.

## **Appendices:**

Appendix 2A: Review of Policies, Plans and Programmes

Appendix 2B: Baseline Information

Appendix 2C: Method for developing the Sustainability Objectives

Appendix 2D: Compatibility and potential conflicts between the Sustainability Objectives

Appendix 2E Health Impact Assessment Screening

Appendix 3 Equality Impact Assessment Screening