



Sustainability Appraisal for the Core Strategy:  
Adoption Statement  
London Borough of Tower Hamlets

September 2010



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# 1 Introduction

## 1.1 BACKGROUND

1.1.1 The primary purpose of the Local Development Framework is to assist in the regeneration and sustainable development of Tower Hamlets by implementing the spatial aspects of building One Tower Hamlets. The Core Strategy is the principal document in the LDF as it sets the borough's spatial strategy to 2025. The Core Strategy provides a 15 year plan that will shape what the London Borough of Tower Hamlets (LBTH) looks like in the future.

1.1.2 Other Development Plan Documents that will support the Core Strategy are:

- Development Management DPD - setting out detailed policies to support development decisions;
- Sites and Placemaking DPD - setting out place and site specific proposals for the borough, including key site allocations;
- Proposals Map – setting out specific boundaries within which particular policies apply;
- Any Area Actions Plans that are required; and
- In addition, any Supplementary Planning Documents required to help support and add further detail to the DPD policies.

1.1.3 The Core Strategy was submitted to the Secretary of State on 18 December 2009 for an independent examination by an appointed Inspector. The Examination in Public enabled stakeholders to submit representations on the content of the Core Strategy.

1.1.4 As part of this process, a Sustainability Appraisal (SA) of the Core Strategy was also submitted. The Core Strategy was formally adopted by Full Council on 15 September 2010..

1.1.5 In accordance with Regulation 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004 this statement sets out:

- How environmental considerations have been integrated into the Core Strategy;
- How the environmental report has been taken into account;
- How consultation responses have been taken into account;
- Reasons for choosing the Core Strategy as adopted in light of other reasonable alternatives dealt with; and
- Measures that are to be taken to monitor significant environmental effects of the implementation of the Core Strategy.

## 1.2 SUSTAINABILITY APPRAISAL

1.2.1 A sustainability appraisal (SA) has been undertaken as part of the Core Strategy process. The Sustainability Appraisal considers the potential impacts of a plan on the environment, the economy and society. It does this by assessing the extent to which the plan will help achieve a set of objectives that cover a range of issues, including air quality, landscape, water, health and the population. The Sustainability Appraisal also has to satisfy the requirements of the EC Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (known as the Strategic Environmental Assessment [SEA] Directive).

## 1.3 ADOPTION STATEMENT

1.3.1 This document is the Adoption Statement for the LBTH Core Strategy Sustainability Appraisal and has been prepared in accordance with the provisions of Regulation 16 (4) of the



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Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). It is the last stage in the SA process. The Statement must include the following information:

- How environmental considerations have been integrated into the plan or programme;
- How the Environmental Report has been taken into account;
- How opinions expressed in relation to the consultations on the Environmental Report have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

#### 1.4 ADOPTED CORE STRATEGY PUBLICATION

1.4.1 The Core Strategy, the accompanying SA Report, the CS Adoption Statement and this document will be available on the London Borough of Tower Hamlets (LBTH) website at:

<http://www.towerhamlets.gov.uk>

1.4.2 The documents will also be available to be inspected free of charge at the offices of The London Borough of Tower Hamlets from 9:00am – 5:00pm and at Idea Stores and libraries at normal opening hours. To further raise awareness, adverts notifying the public of the adoption of the Core Strategy will be placed in East End Life and East London Advertiser newspapers. Letters will be sent to all statutory stakeholders and local public who commented on the Core Strategy (Submission Version).



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## 2 Integration of the SA

### 2.1 HOW SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE CORE STRATEGY

2.1.1 An integral part of the process of preparing the Core Strategy has been to undertake a SA to ensure the integration of social, environmental and economic considerations into the development of the Core Strategy vision, objectives and policies. In undertaking the SA the requirements of the SEA Directive and the SEA Regulations have been incorporated into the SA.

2.1.2 The SA was initiated during the evidence gathering stage, initially culminating in the production of the SA Scoping Report in May 2008. The Core Strategy went through three distinct iterations and at each stage in the preparation of the Core Strategy options have been tested against the SA framework of objective and criteria to predict and evaluate the effects of the Core Strategy, recommend enhancement measures and where necessary suggest ways of mitigating adverse effects. A Sustainability Report was published at each stage culminating in the final SA submitted alongside the Core Strategy in August 2009.

### 2.2 HOW THE ENVIRONMENTAL REPORT HAS BEEN TAKEN INTO ACCOUNT

2.2.1 This section will review how the SA engaged with the Core Strategy throughout the various iterations of its development. The SAs prepared for the three iterations of the Core Strategy were;

- SA of the Core Strategy Consultation Document – Options and Alternatives (OA) (July 2008);
- SA of the Core Strategy Consultation Document – Options and Alternatives for Places (OAP) (February 2009); and
- SA of the Core Strategy 2025 Proposed Submission Document (PSD) (August 2009).

2.2.2 How each Sustainability Report was taken into account is considered in turn.

#### *SA OF THE CORE STRATEGY CONSULTATION DOCUMENT - OPTIONS AND ALTERNATIVES (OA)*

2.2.3 The SA of the Core Strategy OA (July 2008) was the first iteration of the SA and was undertaken when the Core Strategy was at a relatively early stage. As such, whilst the essential ambition and structure of the Core Strategy remained consistent throughout the latter iterations, substantial revisions were made to certain aspects of the Core Strategy as the options became increasingly refined. Four tables of recommendations were set out in the SA of the Core Strategy OA, which in turn were;

- Recommendations on the Spatial Themes and Guiding Principles;
- Recommendations on the Overarching Options;
- Recommendations on the Key Issues; and
- Recommendations on the Specific Options.

2.2.4 The four tables of recommendations and the reasoning behind them can be found in Appendix A. The recommendations were discussed with the Core Strategy team in both meetings and workshops and fed into the following iteration of the Core Strategy, namely the Core Strategy Consultation Document – Options and Alternatives for Places (OAP).

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*SA OF THE CORE STRATEGY CONSULTATION DOCUMENT – OPTIONS AND ALTERNATIVES FOR PLACES (OAP)*

2.2.5 The SA first assessed the Guiding Principles, Vision, Preferred Strategy and Spatial Themes of the Core Strategy OAP. The SA recognised the fact that many of the recommendations of the previous SA had been taken into account, therefore reducing the need for further recommendations. A small number of recommendations were set out, in particular the Sustainability Appraisal Report recommended that the Core Strategy vision and principles could highlight:

- The intent to create a network of green and blue spaces, within which the centres will sit;
- The intent to tackle social exclusion and the need to ensure that existing residents and workers have the opportunity to benefit from the opportunities new development will bring;
- The intent to regenerate existing areas (that might be outside or on the edge of one of the identified centres) and the need to respect the character of existing areas;
- The need to adopt a long term view and recognise that some of the centres proposed are more aspirational than others; and
- The need to integrate sustainability, for example through the concept of low carbon zones and centres as renewable energy hubs.

2.2.6 The SA then assessed the Places Plans. The assessment concluded that it was clear that the Places Plans would achieve a number of SA objectives and that the next iteration of the Core Strategy should communicate how the spatial elements of the Strategy (for example the green grid, blue grid and energy/waste) relate to each place. The assessment, informed by a workshop, concluded that;

- No recommendations were made for Local Area Plans (LAPs) 1&2;
- For LAPs 3&4 there was an opportunity to tie the wet/dry recreational facilities in with the wider regeneration of the area and priority could be given to locations that are consistent with this approach;
- For LAPs 5&6 there was a need to manage the greater ecological pressure placed on Victoria and Mile End Parks and that consideration needed to be given to the potential impact of transition on existing uses and people who work in the area of Fish Island; and
- For LAPs 7&8 the spatial strategy should include proposals for improving physical accessibility to Canary Wharf from surrounding areas.

2.2.7 Overall, the assessment process identified a number of recommendations to the Core Strategy to ensure that key sustainable development issues were given sufficient weight within the document. The issues identified were:

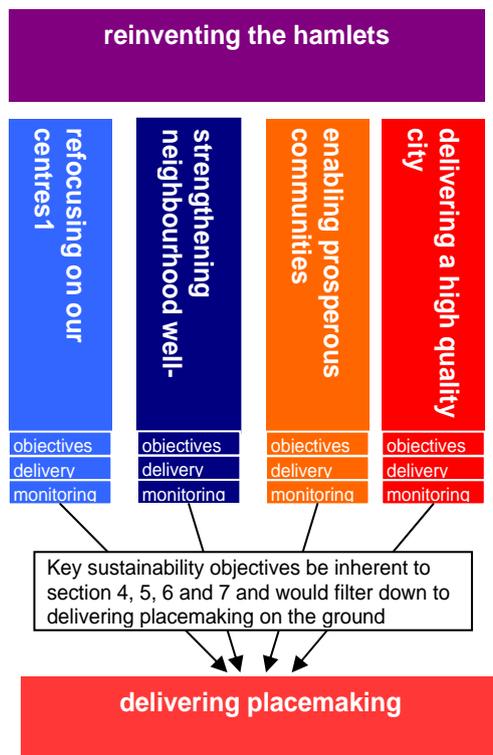
- The regeneration of derelict/underused sites;
- Improving access to waterways;
- Improving water efficiency;
- Making use of waste as a fuel source;
- Enhancing biodiversity and wildlife;
- Promoting a green economy; and
- Sustainable tourism.

SA OF THE CORE STRATEGY 2025 PROPOSED SUBMISSION DOCUMENT (PSD)

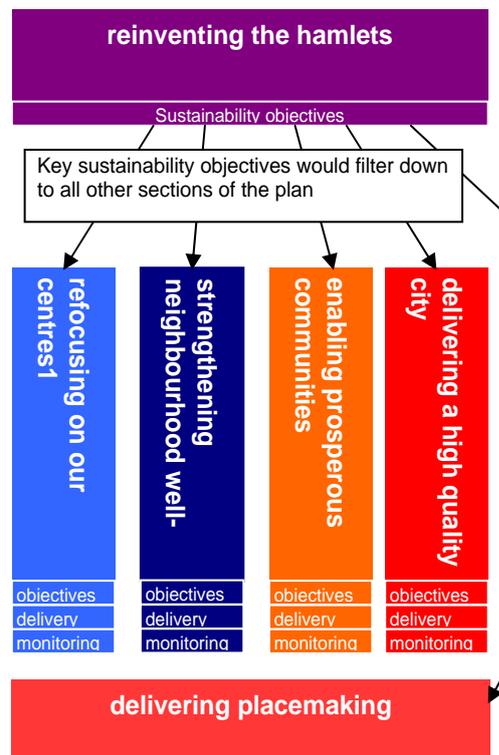
2.2.8 The SA of the Core Strategy 2025 PSD first undertook an analysis of the Core Strategy objectives. This was a comparative analysis undertaken to establish what changes had been made to the objectives in the intervening period between all three iterations of the Core Strategy. The outcome of the exercise was that the earlier recommendations that had been made were found to be reflected in the Core Strategy objectives and policies. The full assessment table can be found in Appendix B.

2.2.9 The review of the Core Strategy 2025 PSD objectives also identified potential revisions to how the objectives were presented to ensure that they are integrated within the Core Strategy. The two initial options, and how they could be reflected in amendments to the Core Strategy spatial vision and spatial strands diagram, are set out below:

**Option 1**



**Option 2**



2.2.10 Following revisions to the Core Strategy the diagram was amended to a version similar to Option 2 but with Delivering Placemaking remaining as one of the five spatial themes.

2.2.11 The SA then assessed the Core Strategy’s Key Principles, Big Spatial Vision and Spatial Themes, concluding that the assessment of the borough wide elements of the Core Strategy against the SA objectives demonstrates that they covered a comprehensive spectrum of issues and that many of the recommendations made in the previous SA had been taken on board.

2.2.12 The SA next assessed the Core Strategies approach to placemaking. This assessment found that some of the recommendations previously made had been fully addressed, whereas for some others it was recommended that further, more detailed work be undertaken for the development of the future Development Plan Documents to gain a greater understanding of the issues.

2.2.13 Finally, in addition to the assessment of thematic and spatial options, a number of detailed options were assessed. The recommendations that came out of the assessment exercise were to:

- Examine stronger economic role for Whitechapel taking full advantage of Crossrail and the Olympics. In particular, development helping to create economic balance across the borough;
- Consider the east of the borough as a potential location for CHP plant;
- Identify potential open space in areas of deficiency such as the Wapping/Shadwell/Whitechapel area;
- Consider Fish Island, Mile End and Bromley-by-Bow as potential locations for a new secondary school;
- The vision for Bromley-by-Bow town centre as a District Centre recognises the opportunity for regeneration and the creation of a new district centre in the east of the borough.
- Identify the role of the forthcoming Place Plans documents in engaging local communities in the regeneration process.
- That the uncertainties still outstanding for the regeneration of Poplar and Poplar Riverside including the adequate provision of open greenspace, water and energy efficiency measures and the effect of high density development on the urban heat island are clarified and appropriate parameters established.

2.2.14 A review of all three iterations of the Core Strategy and associated Sustainability Appraisal Reports, the outcomes of the workshops, discussions that had been held and consultations responses fed back concluded that the following are key areas of concern that will need to be addressed as the Core Strategy is implemented through other plans more detailed plans and/or planning applications:

- Ecological footprinting – the need to reduce the ecological and carbon footprint of the Borough. This concept covers issues around water consumption, reducing energy use and Green House Gas emissions, transport and construction/regeneration, amongst other factors. This could be achieved through the Community Plan, Development Management DPD and future related strategies;
- Issues around air quality and the implications of increasing the population in areas of existing poor air quality, which could be managed through the Air Quality Strategy and related initiatives at the Places and project level;
- Issues around climate change adaptation and reducing vulnerability to extreme weather events, including flood risk and the implications of increasing the population in areas of existing flood risk. The urban heat island effect is also relevant here. These issues could be addressed through LBTH's emergency planning procedures, climate change planning at the Borough and Places levels and at the project level;
- Social equity – issues around ensuring that host communities (those who live and work in the area) benefit from new development and are not adversely affected by it, e.g. through displacement associated with regeneration and issues around health inequality. The Statement of Community involvement should provide a framework in which to address this, including the use of Equality Impact Assessments if deemed necessary;
- Building sustainable communities – this broad term is used to encapsulate issues around infrastructure provision, including green and blue spaces that will benefit people and improve biodiversity but also issues around diversifying areas to achieve a mix of socio-economic groups, therefore this will need to be addressed as an integral part of LBTH planning and should be reflected in the DPDs and SPDs that will have an affect on these issues; and

### 2.3 BUILT HERITAGE – THE POTENTIAL FOR NEW DEVELOPMENT TO IMPACT ON EXISTING CHARACTER AND KEY FEATURES WILL NEED TO BE MANAGED THROUGH TOOLS SUCH AS CONSERVATION AREA

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MANAGEMENT PLANS AND THE DEVELOPMENT MANAGEMENT DPD. HOW OPINIONS EXPRESSED IN RELATION TO THE CONSULTATIONS ON THE SCOPING REPORT AND SA REPORT HAVE BEEN TAKEN INTO ACCOUNT

2.3.1 Regulation 12 (5) of the SEA Regulations requires consultation with the statutory consultees on the 'scope and level of detail of the information that must be included in the [environmental] report'. For the purposes of the SA the statutory consultees are the Environment Agency, English Heritage and Natural England. Regulation 13(2) requires the environmental report to be consulted on with both the statutory consultees and the public. In undertaking the SA, these requirements were met and consultations were held as follows:

- **SA Scoping Report:**
  - Consultation ran from 29 May to 3 July 2008.
- **SA of the Core Strategy Consultation Document – Options and Alternatives:**
  - Consultation ran from 21 July to 2 September 2008.
- **SA of the Core Strategy Consultation Document – Options and Alternatives for Places:**
  - Consultation ran from 5 February to 19 March 2009.
- **SA of the Core Strategy 2025 Proposed Submission Document:**
  - Consultation ran from 14 September to 26 October 2009.

The Consultation Summary Report for each of these can be found on LBTH's website at:

[www.towerhamlets.go.uk](http://www.towerhamlets.go.uk)

## 2.4 THE REASONS FOR CHOOSING THE PLAN OR PROGRAMME AS ADOPTED, IN THE LIGHT OF THE OTHER REASONABLE ALTERNATIVES DEALT WITH

2.4.1 In preparing the Core Strategy a range of options were put forward that formed different approaches to addressing the key planning issues facing LBTH. This included options set out in both the Core Strategy – Options and Alternatives and the Core Strategy – Options and Alternative's for Places. The SAs of these two iterations of the Core Strategy set out the detailed results of these assessments in Appendix A and Appendices C&D respectively.

2.4.2 The information developed for the previous withdrawn Local Development Framework group of documents (withdrawn September 2007) considered detailed thematic options where were utilised to inform the spatial options developed for the Core Strategy OA.

2.4.3 The Core Strategy – Options and Alternatives presented two overarching options for growth:

- Option A: Refocus Development on Centres; and
- Option B: Allow for organic growth across the borough.

2.4.4 The SA found that under Option A the concept of Centres provides a basic positive land use organising principle against which the future spatial development of the borough could be planned. It also provides the basis for planning for existing town centres within the borough, ensuring that they adopt complimentary, rather than competing roles.

2.4.5 The preferred Option chosen for the Core Strategy took elements from both Options in that it enables growth to be refocused in and around town centres while supporting regeneration of areas and locations outside of town centres. As such a combination of the two options was chosen.



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2.4.6 The Core Strategy – Options and Alternatives also presented a number of specific options relating to specific themes such as climate change and enabling prosperous communities. The results of the assessment of these specific options can be found in Appendix C of the SA of the Core Strategy OA. The results of the assessments of specific options were used to form the basis of what would later become the Strategic Objectives and Spatial Policies of the adopted Core Strategy.

2.4.7 The focus of the Core Strategy OAP was on the 24 places. It presented a number of spatial themes across the borough, the preferred approach to addressing each theme and, where applicable, alternative options. These were assessed as a part of the SA and the detailed assessment can be found in Appendix C of the SA of the Core Strategy OAP.

2.4.8 For all optioneering exercises, LBTH considered the outcomes of the SA with the outcomes of an Equalities Impact Assessment, Habitats Regulations Assessment and consultation responses in deciding the most appropriate way forward. The Core Strategy, as adopted, has been found sound following examination by an independent Planning Inspector and is supported by a variety of evidence base documents which considered alternatives to provide a preferred approach. As such the Core Strategy represents a sustainable approach to key planning issues in the borough.

## 2.5 THE MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE PLAN OR PROGRAMME.

2.5.1 The SEA Directive requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken (Article 10.1 refers).

2.5.2 Guidance on monitoring from ODPM states<sup>1</sup>:

*“Local planning authorities should adopt an integrated approach to monitoring local development frameworks that takes full account of the monitoring needs of Sustainability Appraisal and the SEA Directive.”*

2.5.3 Local Planning Authorities are required to prepare an Annual Monitoring Report. The indicators will need to include consideration of the following topics in order to meet the requirements of the SEA Directive:

- Biodiversity;
- Population;
- Human health;
- Fauna;
- Flora;
- Soil;
- Water;
- Climatic factors;
- Material assets;
- Cultural heritage;
- Landscape.

2.5.4 The Core Strategy needs to ensure that monitoring of outcomes and effects is undertaken. It is recommended that this be undertaken through LBTHs Annual Monitoring Report processes in order to demonstrate compliance with the SEA Directive.

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<sup>1</sup> Local Development Framework Monitoring: A Good Practice Guide, ODPM, March 2005  
12262229

# Appendix A Core Strategy – Options and Alternatives Paper Recommendations

Set out below are the recommendations from the SA of the Core Strategy OA (July 2008). They are in four tables:

- Table A1 - Recommendations on the Spatial Themes and Guiding Principles;
- Table A2 - Recommendations on the Overarching Options;
- Table A3 - Recommendations on the Key Issues; and
- Table A4 - Recommendations on the Specific Options.

**Table A1**

<b>Recommendations on the Spatial Themes and Guiding Principles</b>	
<b>Recommendation</b>	<b>Reason</b>
Consider amending 'tackling climate change' to 'living within environmental limits.'	This amendment would recognise that the drivers the Core Strategy is responding to are broader than climate change – our contribution to climate change is symptomatic of our ability to live within the earth's resources.
Under governance consider adding - We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.	The principles relating to governance refer to the decision making process, in the context of using sound science but they could also acknowledge the need to avoid 'balancing' different considerations to achieve integrated or 'win-win-win' solutions.
Provide text to explain the thinking behind each principle.	There is a need to explain terms like 'social infrastructure' etc. and to provide more detail on the principles and what they mean.
Governance – the second bullet point relating to using sound science responsibly could be amended to recognise uncertainty (through the precautionary principle) as well as public attitudes and values.	To reflect the wording the UK Strategy and recognise that there can be uncertainty in the scientific community on relevant issues and how to tackle them.
Governance – could promote longer term thinking when investment decisions are taken.	We understand this is implicit within the principles but could be made explicit as it has implications for how projects are evaluated.

**Table A2**

<b>Recommendations on the Overarching Options</b>	
<b>Recommendation</b>	<b>Reason</b>
Consider the role of corridors within Option A.	The corridors between centres could have an important function in terms of accessibility to centres, gateways to them (with implications for the quality of development along them) and the provision of an appropriate range of activities outside of centres in locations that provide transport choice.
Whatever option is adopted - Pool developer contributions.	Pooling developer contributions in advance of the introduction of the Community Infrastructure Fund could help ensure that objectives that cannot be achieved in one particular area are achieved elsewhere, for example the provision of renewable energy may not be practicable on one site but any under provision could be off-set elsewhere.

**Table A3**

<b>Recommendations on the Key Issues</b>	
<b>Recommendation</b>	<b>Reason</b>
Recognise the ageing population as a key issue under strengthening neighbourhood well being.	The ageing population has implications for health provision and the housing stock.
Recognise energy security as a key issue.	The security and reliability of energy is a key issue and the Core Strategy could recognise this.
Recognise ambient noise as a factor under 'Designing a High Quality City.'	Ambient noise impacts on health and the move towards a 24 hour economy along with intensification of development could impact on this.
'Need to ensure high quality well designed buildings could recognise the need for buildings to be flexible to meet changing needs.	Broadening the issue in this way recognises issues associated with an ageing population and other factors.
Under spatial theme 4 recognise that 'poor air quality may get worse with climate change'	This recognises the potential link between climate change and air quality over the plan period.
Under strengthening neighbourhood well being, add energy security as a key issue.	This recognises long term issues in relation to the capacity of the Grid and a further reason for promoting local energy generation.
The existence of contaminated sites within the borough should be added as an issue to strengthening	Tackling contamination is central to bringing land back into use.



neighbourhood wellbeing	
Make the need to manage demand for and use of water explicit as a key issue under Tackling Climate Change theme.	This recognises the need to manage water and contribute towards reduced dependence on importing water.
Under 'enabling prosperous communities' – add reference to promoting the knowledge based economy.	The knowledge based economy is already important to the economy of the Borough and there is a need to ensure growth in this sector continues.
Under 'enabling prosperous communities' – add need to identify and plan for potential clusters.	Clusters could have a role in promoting economic growth within the Borough and the Core Strategy could have a role in promoting these, examples include activities within the knowledge based economy.
Under 'tackling climate change' – add need to reduce ecological footprint.	This issue recognises that the use of natural resources is a key issue both during construction and operation. Climate change is not the only driver; there are wider issues around resource availability.
Under 'enabling prosperous communities' - recognise Issue of displacement of existing employment activities when sites are redeveloped.	This will continue to be an issue as sites are redeveloped and the Core Strategy needs to set the approach to mitigating this.

**Table A4**

<b>Recommendations on the Specific Options</b>	
<b>Recommendation</b>	<b>Reason</b>
<b>Spatial Theme 1: Climate Change</b>	
Consider adding targets for the development and refurbishment of all buildings as an action/option.	The Code for Sustainable Homes is acknowledged in the actions but this only relates to new build dwellings. Refurbishments and conversions for residential use will be assessed under Eco-Homes and other buildings can be assessed against the Building Research Establishments Environmental Assessment Method (BREEAM), the actions allude to the possibility of using this and we suggest the actions go further and confirm that it will be used as the basis for setting the standard for non-residential development.
Consider an action relating to integrated energy and waste concept strategies.	Early consideration of the potential for on-site energy provision and provision of on-site waste facilities is beneficial, particularly if communal facilities are to be provided, e.g. Combined Cooling, Heat and Power. Integrated Energy and Waste Concept Strategies are an established way of assessing potential and the Core Strategy could flag this up. Strategies could be prepared for sites and areas, e.g. town centres or major



	development sites. They could also consider issues around micro-climate.
Define zero carbon.	We understand the term to mean no net carbon emissions from all energy uses in the home and the amount of energy taken from the grid is less than or equal to the amount put back through renewable technologies.
Consider undertaking a climate change vulnerability study.	Intensification of uses within the Borough could exacerbate the urban heat island effect and there could also be issues around the capacity of drainage infrastructure. A climate change vulnerability study for the Borough as a whole could be undertaken to consider such issues.
Consider an action around the provision of exemplar schemes or schemes with an educational element.	There could be a potential link between Education for Sustainable Development and Global Citizenship and Zero or low carbon initiatives.
<b>Spatial Theme 2: Designing a High Quality City</b>	
Consider specific actions relating to noise.	<p>The European Directive on the Assessment and Management of Environmental Noise (END) has identified the importance of “Quiet Areas”. The END requires Member States to produce action plans in order to protect these areas against any increase in noise in the future.</p> <p>The Local Development Framework (LDF) could have a role in identifying areas of relative quiet in the Borough which should be protected or created.</p> <p>The LDF could have a role in identifying areas where noise (and other issues associated with the 24 hour city) will be managed. This could be particularly relevant with the promotion of mixed-use development in centres.</p>
Consider an action relating to the provision of strategic sites for the storage and distribution of construction materials.	The scale of development in the Borough is huge and will give rise to lorry movements associated with the movement of materials etc. onto construction sites. A possible action is the identification of strategic sites that could be used to store and transfer materials; Helping to reduce lorry movements and transport costs. Potentially suitable sites could be safeguarded.
Consider an additional action/option relating to biodiversity.	The Core Strategy could promote ecological budgeting – options are to seek no net loss or an overall increase in ecological value for a site – a high level strategy but would need clarification in a lower tier document.
Have an action to tackle Areas of Deficiency for Nature Conservation (AODs).	AODs are defined by the Mayor as being more than 1 kilometre from a site of a least borough importance for nature conservation. There are two large AODs in Tower Hamlets.
Air Quality – Consider an action around the control of industrial premises/intensification of existing	Controlling existing industrial uses that impact on air quality will be important as it will affect the ability of areas to accommodate a mix of uses.



uses.	
Transport – consider an action relating to through traffic and air quality.	Through traffic is a major contributor to poor air quality in the Borough. This will be difficult to influence but could be flagged up. The Core Strategy could have a role in promoting transport choice.
Transport – consider a target for achieving modal shift from the car to other forms of transport.	The Paper includes a range of actions aimed at providing transport choice; these could be backed by a target relating to achieving modal shift, allowing forecast increases in traffic growth associated with increased housing and employment in the area.
The Core Strategy could encourage more sustainable remediation methods for contaminated soils e.g. bioremediation methods and carbon footprint of remediating a site.	These are established techniques but the Core Strategy could have a role in promoting them.
<b>Spatial Theme 3: Enabling Prosperous Communities</b>	
<b>Consider amending objective on tourism to read:</b> “support the growth of sustainable tourism in Tower Hamlets” and add actions relating to the objective of encouraging tourism that is consistent with sustainable development principles. Examples would include making links between the tourism sector and the Mayor’s Food Strategy.	Tourism can have implications for a range of SA objectives, depending on the scale and nature of activities. Objectives where the relationship is uncertain include those relating to climate change, water consumption, energy and waste.
Consider an action relating to the promotion of clusters of economic activity.	The LDF could have a role in identifying and protecting areas that would be suitable for specific clusters of economic activity, for example sectors within the knowledge based economy. The cultural sector is acknowledged in the Paper but the potential is broader than this.
Displacement of existing activity needs to be mitigated.	Redevelopment of existing areas could lead to the displacement of existing firms and jobs – need to consider this when schemes are being devised and provide appropriate mitigation/avoidance measures.
<b>Spatial Theme 4: Strengthening Neighbourhood Well-being</b>	
Consider amending this objective to read: ‘to minimise the production of waste and manage and treat the Borough’s waste sustainably’. Actions also needed in relation to monitoring waste production, and developing a target for reducing waste.	The proposed amendment to the objective reflects the need to reduce waste arisings.
Include a target for the number of	Two options are presented relating to the provision of



affordable houses to be provided over the plan period.	affordable housing. Either approach is considered appropriate in sustainability terms but needs to be backed up by an over all target for the number of affordable housing units that the Council will aim to deliver.
Add an additional action/option relating to student accommodation.	It is understood that there is a demand for student accommodation in Tower Hamlets serving students from across London. One approach would be to work with providers in the Borough to identify accommodation needs arising from within the Borough and restricting provision to meet this need, another approach would be to develop criteria for assessing projects, for example do they serve wider regeneration needs or provide accommodation that might be capable of re-use if needs change? We understand a study is currently being undertaken and the Core Strategy could refer to this.
Promote sustainable design and construction.	A set of targets has been developed for London, these could be signposted in the Core Strategy, or alternatively the Council could consider developing its own targets.
Consider an additional action/option relating to the provision of family housing.	Commuted sums towards the provision of family housing provision off-site could be considered with developers also asked to identify and bring forward potential sites.
Identify linkages with the Housing Strategy in relation t housing mix.	It is understood that revisions to the Housing Strategy that are due in September will include a matrix based approach to the provision of affordable housing/intermediate housing and market housing/larger homes - to give basis for negotiation. It would make sense for the Core Strategy to reference this so that it is formalised within the planning process.
Water neutrality needs to be developed as a concept.	Water neutrality is a big commitment but is welcomed. A water cycle study for the whole borough should be undertaken to determine the feasibility of this and the key actions required.
Consider advocating Water Cycle Studies	Applications for major proposals could be accompanied by a water cycle study.

## Appendix B Comparative Objectives Analysis

Table B1 sets out the results of the comparative analysis of the Core Strategy OA, Core Strategy OAP and Core Strategy 2025 (PSD) objectives.

**Table B1**

Core Strategy OA	Core Strategy OAP	Core Strategy 2025 (PSD)	Comments
The Strategy	The preferred approach	Refocusing on our town centres	
To refocus on and reinforce a hierarchy of successful, rejuvenated and well connected centres across the borough. These centres will be hubs for shopping, commercial, housing and civic uses. They will be important places for all members of the local community to access services. The centres will be located on main routes that are highly accessible by all forms of transport and by walking. The role, function and size of each centre will differ, reflecting an integrated hierarchy of centres across the borough and the region. The development of derelict or underused sites will contribute towards creating this pattern of use.	To have a hierarchy of interconnected centres that are hubs for shopping, commercial, housing and civic uses. They will be important places for all members of the local community to access services. The centres will be located adjacent to main routes that are highly accessible by all forms of transport and by walking. The role, function and size of each centre will differ, reflecting an integrated hierarchy of centres across the borough and the region. The development of derelict or underused sites will contribute towards creating this pattern of use	SO4) To have a hierarchy of interconnected, vibrant and inclusive town centres that are mixed use hubs for retail, commercial, leisure, civic and residential. The purpose of each town centre will differ according to its role and function.  SO5) To promote mixed use at the edge of town centres and along main streets.  SO6) To promote areas outside of town centres and edge of town centres for primarily residential and supporting uses that do not need the higher levels of accessibility that town centres require.	The new approach of refocusing on town centres provides a more detailed description of how this development is expected to take place, particularly on the town centre periphery. The focus on locating development in accordance with accessibility levels is welcomed.
<b>Strengthening neighbourhood well-being</b>	<b>Strengthening neighbourhood well-being</b>	<b>Strengthening neighbourhood well-being</b>	
To create socially balanced and inclusive communities that provide for a range of dwellings to meet the needs of the community; and  To ensure everyone has access to a home, that homes are affordable and they are high quality and	To create socially balanced and inclusive communities by providing a range of dwellings to meet the needs of the community; and  To ensure everyone has access to a decent home that they	SO7) Deliver housing growth to meet general and specialised housing demand in line with London Plan housing targets.  SO8) Ensure housing contributes to the creation of socially balanced and inclusive	There is a broad alignment between the sets of objectives, with welcome additional emphasis on energy efficient, sustainable housing.

liveable.	can afford and are of high quality and durable.	communities by offering housing choice reflecting the Council's priorities for affordable and family homes.  SO9) Ensure that all housing in Tower Hamlets is high quality, well designed, energy efficient, sustainable and durable.	
Ensure that growth is supported by necessary and adequate social and physical infrastructure in the right place at the right time.	Ensure that growth is supported by high quality social and physical infrastructure in the right place at the right time.	SO10) To deliver healthy and liveable neighbourhoods that promote active and healthy lifestyles and enhance peoples wider health and well-being.  SO11) To ensure the timely provision of social infrastructure to support housing and employment growth.	
To promote a healthy community by protecting the environment in which people live, work and play; and  To ensure neighbourhoods promote active and healthy lifestyles.	To promote a healthy community by protecting and enhancing the environment in which people live, work and play; and  To ensure neighbourhoods promote active and healthy lifestyles.	SO10) To deliver healthy and liveable neighbourhoods that promote active and healthy lifestyles and enhance peoples wider health and well-being.  SO11) To ensure the timely provision of social infrastructure to support housing and employment growth.	
To create an interlinked network of high quality, accessible green open spaces in the borough.  To create an interlinked network of areas rich in biodiversity and wildlife.	To create an interlinked network of high quality, sustainable and accessible green open spaces in the borough; and  To create an interlinked network of areas rich in biodiversity and wildlife.	SO12) To create a high-quality, sustainable, well-connected and sustainable natural environment of green and blue spaces that are rich in biodiversity and promote active and healthy lifestyles.	
To create a network of high quality, accessible and useable waterspaces; and	To create a network of high quality, accessible and useable waterspaces;	SO13) To reduce the risk and impact of flooding on people, property and the	

To reduce the risk of flooding.	To reduce the risk of flooding in the borough to people and property; and  To reduce water usage and improve water quality.	environment.	
To manage and treat the Borough's waste sustainably, minimising the amount of waste produced and maximising recycling.	To manage the borough's waste efficiently, safely and sustainably by minimising the amount of waste produced, maximising reuse and recycling, treating and disposing waste in a sustainable manner as well as using waste as a potential asset to fuel local renewable energy centres.	SO14) To plan for and manage the borough's waste efficiently, safely and sustainably, by minimising the amount of waste produced, maximising recycling, and managing non-recyclable waste using treatment methods other than landfill.	
<b>Enabling our communities</b>	<b>Enabling our communities</b>	<b>Enabling our communities</b>	
To support our major employment hubs with excellent access for local residents; and  To support a strong and dynamic economy which delivers a range of jobs and opportunities for local people.	Thriving global employment hubs at Canary Wharf and the City Fringe as drivers of the regional and local economy;  Ensure excellent access to employment opportunities;  Ensure local residents are prepared to access employment opportunities; and  Supporting existing and new businesses including small and medium enterprises, with a particular focus on research & knowledge, innovation & technology, services, green/eco and creative and cultural sectors.	SO15) To support the thriving and accessible global economic centres of Canary Wharf and the City Fringe that benefit the regional and local economies.  SO16) To support the growth of existing and future businesses in accessible and appropriate locations.	The central emphasis of the current objectives is on enhancing the economy through supporting business primarily via new office space and improving education. Promoting green industries and therefore moving towards a green economy is no longer set out in the objectives and there is a reduced emphasis on sustainable tourism.
To support a range of new businesses, enterprises and economic sectors, with a particular focus on research & knowledge,	To encourage and support the growth of sustainable tourism in Tower Hamlets.	SO16) To support the growth of existing and future businesses in accessible and ap-	



<p>innovation &amp; technology, service, green/eco and creative and cultural sectors.</p> <p>To support and encourage the growth of tourism in Tower Hamlets.</p> <p>To support a range of new businesses including small and medium enterprises, with a particular focus on research &amp; knowledge, innovation &amp; technology, services, green/eco and creative and cultural sectors.</p>		<p>propriate locations.</p>	
	<p>To improve skills, education and training in the borough and encourage and facilitate lifelong learning; and</p> <p>To support the growth and expansion of Universities as drivers of improved skills and as part of the local knowledge economy.</p>	<p>SO17) To improve education, skills and training in the borough and encourage and facilitate life-long learning.</p> <p>SO18) To promote the growth and expansion of further and higher education establishments as drivers of improved skills and a key part of the wider knowledge economy.</p>	
<p><b>Designing a high quality city</b></p>	<p><b>Designing a high quality city</b></p>	<p><b>Designing a high quality city</b></p>	
<p>Ensure people can easily and equally access places for work, learning, leisure and services both within and outside the borough</p>	<p>Ensure everyone can easily access places of work, learning, leisure and services within the borough and areas outside of the borough;</p> <p>To protect land needed for future transport infrastructure; and</p> <p>Ensure sustainable forms of transport</p>	<p>SO19) Deliver an accessible, efficient, high quality, sustainable and integrated transport network to reach destinations within and outside of the borough.</p>	<p>These two sets of objectives address largely the same issues but using two different sets of words. The current sets of objectives provide a better focus on the key sustainability issues.</p> <p>The addition of an objective of reducing carbon emissions is welcome.</p>
<p>To create people-friendly, attractive, cohesive and safe streets and public spaces.</p>	<p>To use good design as a place making and way finding tool; and</p> <p>To assist in creating</p>	<p>SO20) Deliver a safe, attractive, accessible and well designed network of streets and</p>	



	<p>an environment which people value, enjoy and feel comfortable in.</p>	<p>spaces that makes it easy and enjoyable for people to move around on foot and bicycle.</p> <p>SO21) Create streets, spaces and places which promote social interaction and inclusion and where people value, enjoy and feel safe and comfortable in.</p>
<p>To create a network of interconnected places that support positive local identity, character and a strong sense of place; and</p> <p>To promote a borough of high quality, durable and robust buildings</p>	<p>To create a network of interconnected places that support positive local identity, character and a strong sense of place; and</p> <p>To promote a borough of appropriate high quality, sustainable and robust buildings.</p>	<p>SO23) Promote a borough of well designed, high quality, sustainable and robust buildings that enrich the local environment and contribute to quality of life.</p>
<p>To create a network of interconnected places that support positive local identity, character and a strong sense of place;</p>	<p>To protect and celebrate our heritage; and</p> <p>To place heritage at the heart of regenerating our town centres to retain and enhance local distinctiveness.</p>	<p>SO22) Protect, celebrate and improve access to our historical and heritage assets by placing these at the heart of reinventing the hamlets to enhance local distinctiveness, character and townscape.</p>
	<p>Tackling Climate Change</p>	<p>SO24) Achieve a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025.</p>
	<p>Encourage renewable energy within the borough and linked into a wider network for east London.</p> <p>Ensure that all new homes reach zero carbon by 2016 and that all non domestic properties reach zero carbon by 2019</p> <p>Achieve zero carbon borough in the current century, with 20% reduction by 2025.</p>	<p>SO24) Achieve a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025.</p>

No direct comparator	No direct comparator	Delivering placemaking (place-by-place)	
<i>The strategy for places had no objectives in the Core Strategy OA.</i>	To deliver successful placemaking in Tower hamlets in order to create distinctive, healthy and great places for communities.	SO25) Deliver successful placemaking in Tower Hamlets in order to create locally distinctive, well designed, healthy and great places which interconnect, respond and integrate into the wider London area.	The strategic objective for delivering placemaking is new to the current Core Strategy and is a welcome addition.
<b>Tackling climate change</b>	No direct comparator	No direct comparator	
<p>To create a renewable energy grid across the borough in order to:</p> <p>To achieve a low carbon borough by 2025 (including reducing emissions by 60% by 2020)</p> <p>OR</p> <p>To achieve a zero carbon borough by 2025</p> <p>To ensure the built form of the borough is zero carbon in order to:</p> <p>To achieve a low carbon borough by 2025 (including reducing emissions by 60% by 2020)</p> <p>OR</p> <p>To achieve a zero carbon borough by 2025</p>	<p>Tackling Climate Change</p> <p>Encourage renewable energy within the borough and linked into a wider network for east London.</p> <p>Ensure that all new homes reach zero carbon by 2016 and that all non domestic properties reach zero carbon by 2019</p> <p>Achieve zero carbon borough in the current century, with 20% reduction by 2025.</p>	SO24) Achieve a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025.	<p>Tackling climate change was only a separate section in the Core Strategy OA and has since be integrated into 'designing a high quality city'.</p> <p>The carbon reduction targets have also been made less immediately imposing than was the case in the Core Strategy OAP. The aim of creating a zero carbon borough by 2025 has been amended to 'this century'. This is a practical amendment in line with the options set out in the Core Strategy OA.</p>