

TOWER HAMLETS



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London Borough of Tower Hamlets

Integrated Impact Assessment Accompanying Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Regulation 19 Draft Local Plan

Report for Consultation –
Main Report



September 2017

Amec Foster Wheeler Environment
& Infrastructure UK Limited



Report for

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4	Report for Consultation	01/09/17
5	Report for Consultation	20/09/17



Non - Technical Summary

Introduction

This Non-Technical Summary (NTS) provides an overview of the Integrated Impact Assessment (IIA) of the emerging Local Plan for the London Borough of Tower Hamlets (the Council). The IIA is being carried out on behalf of the Council by Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) to help integrate sustainable development into the emerging Local Plan. This report presents the results of IIA of the latest Draft Local Plan and builds on initial assessment work that accompanied 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft' which was consulted on between 11th November 2016 and 2nd January 2017.

The following sections of this NTS:

- ▶ provide an overview of the draft Local Plan;
- ▶ describe the approach to undertaking the IIA of the draft Local Plan;
- ▶ summarise the findings of the IIA of the draft Local Plan; and
- ▶ set out the next steps in the IIA of the Local Plan.

The Draft Local Plan

Once adopted the Draft Local Plan will replace the borough's current Local Plan (comprising the Core Strategy and Managing Development Document).

The Local Plan is a critical tool for a planning authority to plan proactively and positively for development by focusing on the community needs and opportunities in relation to places, housing, economy, infrastructure, local services and other areas across the Borough. It also seeks to establish planning policies that seek to safeguard the environment, aid resilience and adaptation to climate change and enhance the natural and historic environment.

The new Local Plan will set out a vision, strategic priorities and a planning policy framework to guide and manage development in the borough to 2031, in line with the planning policy requirements set out by national government and the Greater London Authority (GLA).

In order to deliver the vision, the Draft Local Plan proposes two key objectives to frame policies:

- ▶ Key Objective 1: Managing Growth and Shaping Change; and
- ▶ Key Objective 2: Sharing the Benefits of Growth.

The first objective seeks to ensure that growth contributes to identified social and economic need. The second objective seeks to ensure that growth helps reduce social, economic and environmental inequalities and promote community cohesion, existing health inequalities must also be reduced. Each objective is elaborated through principles and implementation considerations.

The Draft Local Plan establishes planning policies for the following topics:

- ▶ Achieving sustainable growth;
- ▶ Creating attractive and distinct places;
- ▶ Meeting housing needs;
- ▶ Delivering economic growth;
- ▶ Revitalising town centres;
- ▶ Supporting community facilities;



- ▶ Enhancing open spaces and water spaces;
- ▶ Protecting and managing the environment;
- ▶ Managing waste; and
- ▶ Improving connectivity and travel choice.

Each topic includes Strategic Policies that set out key principles and more detailed policies that relate to specific matters within the topic.

The London Plan identifies the City Fringe/Tech City (including Whitechapel), Isle of Dogs and South Poplar, and Lower Lea Valley as Opportunity Areas and it is proposed to reflect these in the Draft Local Plan, in order to ensure the proper planning of infrastructure provision across the area. In consequence, the Draft Local Plan establishes planning policies under the heading of 'Delivering Sustainable Places' for the following sub-areas:

- ▶ City Fringe;
- ▶ Central Area;
- ▶ Lower Lea Valley; and
- ▶ Isle of Dogs and South Poplar.

At the same time the Draft Local Plan identifies the potential for the Central part of the Borough to be treated in the same strategic manner as the Opportunity Areas. The Draft Local Plan also acknowledges that the Borough is a collection of 24 hamlets or places that sit within the sub-areas and the need for new development to reflect that.

Although the Draft Local Plan, once adopted will run to 2031, the current version does not set out the scale of housing and employment to be provided to that date. It will need to do so in order for it to be found sound. The Draft Local Plan discusses the implications of the current target for housing provision in the Borough, which is capacity led, and sets out the Council's commitment to working with the GLA and other local authorities in updating the Strategic Housing Land Availability Assessment and to arrive at a revised housing target that reflects the capacity of sites and their ability to deliver over time.

The options considered in an earlier version of the Local Plan (which are not being consulted on) relate to:

- ▶ Tall buildings;
- ▶ Housing density;
- ▶ Tenure split for housing;
- ▶ Achieving a mix of dwellings in terms of size (number of bedrooms);
- ▶ Ceiling height;
- ▶ Protection of Preferred Office Locations (POLs) from housing development;
- ▶ The period over which vacant employment premises must be marketed for;
- ▶ Town centres;
- ▶ The mix of retail and non-retail units in centres;
- ▶ The period over which vacant retail premises must be marketed for;
- ▶ Safeguarding waste sites;
- ▶ Targets for reducing carbon emissions;
- ▶ Car parking standards;
- ▶ Cycle parking standards; and

- ▶ Delivering the vision.

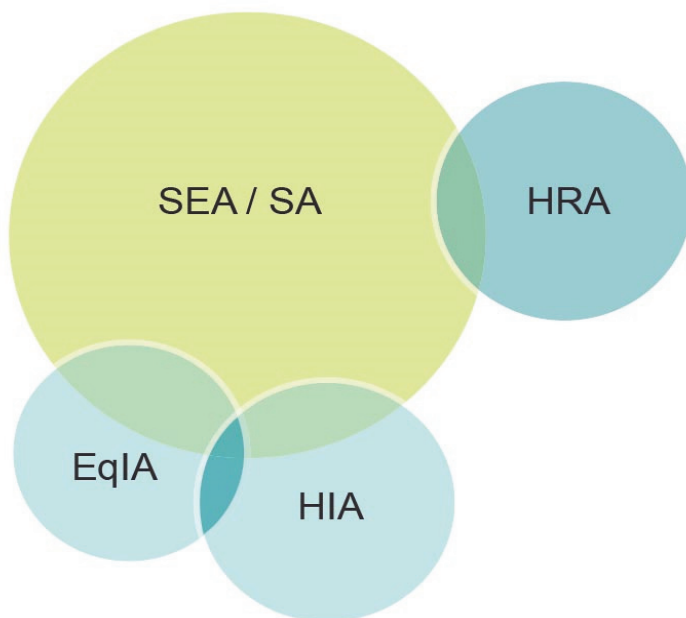
More detail in relation to options is provided in **Section 3.2** of the Main Report and **Appendix J**. The stage at which the Local Plan is at is important as it influences what the IIA can do and what can be assessed at this point in time.

Integrated Impact Assessment

This IIA incorporates:

- ▶ Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) – that consider the potential for significant economic, social and environmental effects;
- ▶ Health Impact Assessment (HIA), which focusses on health and well-being and how the Draft Local Plan contributes to these;
- ▶ Equalities Impact Assessment (EqIA), which helps the Council to consider its duties under the Equality Act 2010 and Public Sector Equality Duty, which requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Habitats Regulations Assessment (HRA);
- ▶ Habitats Regulations Assessment (HRA); Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the ‘Habitats Regulations’) requires that competent authorities (including the Borough Council) assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any ‘likely significant effects’ (LSE) on any European site.

There is some overlap between the different forms of assessment that make up the IIA and this is shown in the diagram below.



How has the Draft Local Plan Been Appraised?

To support the appraisal of the Draft Local Plan a set of SA Framework was developed. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Local Plan and the objectives contained within other plans and programmes reviewed for their relevance to the SA and Local Plan. The objectives are accompanied by a set of guide questions and criteria that have been used to assess options, policies and strategic sites. The SA objectives are shown in **Table NTS 1**.

Table NTS 1 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 conserve 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.

Policies, options and strategic sites in the Draft Local Plan have been appraised using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.

Table NTS 2 Scoring System for the Sustainability Appraisal

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

As part of the IIA the Draft Local Plan was also assessed using other methodologies associated with HIA, EqIA and HRA. These approaches are discussed in **Section 2** of the Main Report and accompanying appendices.

The National Planning Policy Framework (NPPF) sets out planning policy at the national level and this has been used to help identify any policy gaps.

Key Findings and Recommendations from the IIA

The Draft Local Plan that is being consulted on sets out intention for strategic planning for the Borough to be more closely aligned with the London Plan by placing greater emphasis on the Opportunity Areas within the Borough identified in the London Plan. It includes a vision, two key objectives, implementing considerations and a set of policies to control development in the Borough. A number of strategic sites are also proposed; the scale of these sites and associated timescales for their development means that many are carried forward from previous planning policy documents.

Sustainability Appraisal

The SA has identified the potential for the vision, key objectives and policies to make to a range of economic, social and environmental factors. No significant policy gaps were identified. The policy appraisal matrices are provided at **Appendix J** and the appraisal of the vision, key objectives and policies are discussed in **Section 3.3** and **Section 3.4** of the main report.

Part 4 of the Regulation 19 Draft Local Plan sets out detailed guidance for the 4 sub-areas identified in the Local Plan. For each sub-area the Local Plan includes an indication of its development potential, a vision, measures to achieve the vision and a set of Development Principles covering design and the historic environment, housing, town centres and employment, environment and transport and connectivity. The Development Principles for the sub-areas are assessed as making a significant positive contribution to a range of SA objectives. The appraisal matrices are provided at **Appendix L** and the appraisal of the sub-areas is discussed in **Section 3.4** of the main report.

Twenty-one sites have been included as proposed allocations within the Regulation 19 Draft Local Plan. Many are major sites identified in the Managing Development Document (April 2013). Two strategic sites are already under construction and therefore have not been appraised.

The remaining nineteen strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The site appraisal criteria and matrices which report the outcome of this assessment for each strategic site are presented at **Appendix M**. The findings of this appraisal are presented in **Table 3.5**. It indicates that the majority of the strategic sites would either have positive or neutral effects on the majority of the SA objectives, with the notable exceptions of SA objectives 10 'Cultural Heritage', 13 'Biodiversity' and 15 'Flood Risk'. Performance against objectives 10 and 13 has improved when compared to the Regulation 18 Local Plan because account has been taken of the Design Principles, in the Local Plan for each site, where relevant, and the extent to which these would help avoid or mitigate significant negative effects. The matrices at **Appendix M** provide a commentary on the appraisal of sites at Regulation 18 and 19 stage and why these have changed. Whether or not an effect will happen will, in some cases, be dependent on how a site is designed and the mix of uses agreed. The majority of the strategic sites give rise to potential negative effects on these objectives owing to their location relative to heritage assets, designated sites and flood risk areas respectively. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan.

Health Impact Assessment

The HIA used the NHS Healthy Urban Development Unit (HUDU) Rapid HIA Assessment Matrix to analyse the impact of the Local Plan and the results are summarised in **Section 3.6** and **Appendix G**. The results suggest that policies will help to secure development that will contribute to a range of positive effects. These relate to factors like housing, transport and mobility, access to healthy food; access to work and training; minimising the use of resources; and climate change. A recommendation arising from the previous HIA, undertaken at the Regulation 18 stage was that the Local Plan could reference designing out crime principles more generally, e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010) and the recommendation has been incorporated in the Regulation 19 Draft Local Plan in Policy D.DH2 'Creating attractive and safe streets and spaces.'

Equalities Impact Assessment

The EqIA was undertaken of the Local Plan and the results are summarised in **Section 3.7** and **Appendix H**. The Local Plan is a Borough wide document that will potentially impact on all of those who live, work and visit the Borough. There are policies in the Draft Local Plan which, while not focussed on people who share one or more of the nine Protected Characteristics identified under the Equality Act 2010, could have significant positive effects. These include policies relating to housing, employment, transport and mobility and inclusive design. The provision of adaptable and accessible housing will bring positive outcomes for the disabled and others. The safeguarding and provision of accommodation for Gypsies and Travellers are also positive. Based on the Equality Analysis Quality Assurance Checklist at **Appendix H**, a Full EqIA is not necessary at this stage in the process as the Draft Local Plan exhibits due regard to the Council's Public Sector Equality Duty. Rather steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop.

A suggestion arising from undertaking the Equality Analysis Quality Assurance Checklist at the Regulation 18 stage was that the policy team consider consulting with or briefing other groups meeting during the consultation period on the Draft Local Plan, e.g. groups identified in the Council's Single Equality Framework, e.g. Community Forums, Local Voices and other relevant local groups if they were meeting during the period over which the document was being consulted on. The Council agreed with this recommendation and undertook additional consultation at Regulation 18 stage. At the Regulation 19 stage, contact will be made with all groups contacted at the Regulation 18 stage.



Habitats Regulations Assessment

The HRA 'screening' undertaken has reviewed the available data and the draft plan and the results are presented in **Appendix I**. The initial assessment conclusion is that the plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.

The HRA assessed the potential for the plan to affect five European sites within 15km of the LBTH area: Epping Forest SAC, Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA and Lee Valley Ramsar. It is considered that the plan is unlikely to have any measurable effects on sites beyond this due to the absence of reasonable impact pathways; with regard to the sites considered, Richmond Park SAC and Wimbledon Common SAC will also be unaffected due to the distances and absence of impact pathways.

Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to minimise the residual risk and suggested amendments to policies/supporting text may be required. A recommended change in relation to Policy D.ES2 'Air Quality' was previously put forward to ensure that project level air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area. The supporting text to the Local Plan has been amended as recommended.

A potential issue in relation to recreational pressure was highlighted in the HRA and the supporting text to Policy D.ES3 has been amended to highlight the potential need for consideration of impacts in relation to this issue at the project level.

These suggestions will be explored with Natural England through consultation on the Draft Local Plan and this report.

Compliance with the NPPF

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

Monitoring

The Regulation 19 Local Plan includes proposals for monitoring which is welcomed. The proposed indicators have been compared against the SA objectives and a gap has been identified in relation to SA objective 16 'Contaminated Land' and the related SEA topic of soils.

Mitigation and Enhancement

A set of recommendations have been provided to help address potential negative effects and enhance positive effects. These are set out in **Table 3.10** of the Main Report. A number of recommendations made earlier in the process have been incorporated in the Draft Local Plan. Outstanding recommendations will be considered later in the plan making process.

Next Steps

This IIA Report is being issued for consultation alongside the Draft Local Plan. The consultation will run from 2nd October to 13th November (5pm) 2017.

The findings of the IIA Report, together with consultation responses and further evidence base work, will be used to help refine the Local Plan. There is a consultation information section in the Local Plan or see www.towerhamlets.gov.uk/localplan



How to Comment on this Report

Details of how to respond to the consultation are provided below.

This Consultation: How to Give Us Your Views

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

Please provide your comments by 5pm on 13th November 2017. Comments should be sent to:

By email: localplan@towerhamlets.gov.uk

By post: FREEPOST

Local Plan Consultation, D&R Strategic Planning

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1. Introduction

1.1 Background

- 1.1.1 The London Borough of Tower Hamlets (the 'Council') has engaged Amec Foster Wheeler to undertake an Integrated Impact Assessment (IIA) of the emerging Local Plan for the Borough. The IIA will incorporate Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). An earlier IIA Report (published in November 2016) accompanied 'Tower Hamlets 2031: Managing Growth and Sharing the Benefits – Consultation Draft' which was consulted on between 11th November 2016 and 2nd January 2017. This latest IIA report accompanies 'Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing the Benefits' the Regulation 19 version of the Local Plan.

1.2 The Draft Local Plan

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

Policy Context

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

National Planning Policy Framework (NPPF)

- 1.2.6 The National Planning Policy Framework (NPPF) (March, 2012) sets out the government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of Local and Neighbourhood Plans, and is a material consideration in planning decisions. It states that in order to be considered sound, a Local Plan should be consistent with national planning policy.
- 1.2.7 The NPPF sets out (at paragraphs 150-157) that each local planning authority should prepare a local plan for its area. Local plans should set out the strategic priorities and policies to deliver:
- ▶ the homes and jobs needed in the area;
 - ▶ retail, leisure and other commercial development;

- ▶ infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management and energy;
- ▶ health, security, community and cultural infrastructure and other local facilities;
- ▶ climate change mitigation and adaptation; and
- ▶ conservation and enhancement of the natural and historic environment, including landscape.

The NPPF and Sustainable Development

1.2.8 The NPPF cross references Resolution 42/187 of the United Nations General Assembly, which defined sustainable development as:

“Meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

1.2.9 The NPPF also cross references the UK Sustainable Development Strategy: Securing the Future.

1.2.10 Paragraph 6 of the NPPF reiterates the requirements of section 39 (2) of the PCPA 2004:

“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”

1.2.11 Paragraph 7 of the NPPF states:

“There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- ▶ **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- ▶ **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- ▶ **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”

1.2.12 Paragraph 14 of the NPPF sets out a presumption in favour of sustainable development and states:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- ▶ local planning authorities should positively seek opportunities to meet the development needs of their area;
- ▶ Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - ▶ any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - ▶ specific policies in this Framework indicate development should be restricted.

For decision-taking this means:

- ▶ *approving development proposals that accord with the development plan without delay; and*
- ▶ *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - ▶ *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - ▶ *specific policies in this Framework indicate development should be restricted.”*

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

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

1.2.14 Paragraph 165 of the NPPF states that:

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

National Planning Practice Guidance

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

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

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

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

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

London Plan

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

- 1.2.19 The Further Alterations to the London Plan (FALP) was adopted in March 2015. The FALP has increased Tower Hamlets minimum ten-year housing target from 28,850 to 39,314 dwellings. Employment provision will also increase significantly, with 35,000 new jobs forecast between 2011 and 2036. The FALP identifies a number of Opportunity Areas in the Borough.
- 1.2.20 The FALP defines Opportunity Areas as areas that can accommodate at least 5,000 jobs or 2,500 new homes or a combination of the two. The London Plan allocates three Opportunity Areas in the borough: City Fringe, Isle of Dogs and South Poplar and Lower Lea Valley (which also includes part of the Olympic Legacy area and the Poplar Riverside Housing Zone and extends into part of London Borough of Hackney and Newham), as areas of particular focus for future growth. These cover more than 50% of the borough.
- 1.2.21 Opportunity Area Planning Frameworks (OAPFs) have been prepared for the City Fringe/Tech City (2015) and Lower Lea Valley (2007). The Planning Framework for the Isle of Dogs and South Poplar Opportunity Area is under preparation.
- 1.2.22 The Lower Lea Valley OAPF was published by the Mayor of London in January 2007 and set out his views on how the Lower Lea Valley as whole should change through the intensification of existing activities, the upgrading of facilities and buildings, and the managed release of industrial land to provide a broader range of land uses.
- 1.2.23 The guidance in Appendix 8 of the Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, replaces the Lower Lea Valley OAPF where the two areas overlap.
- 1.2.24 The Mayor's planning priorities for the Queen Elizabeth Olympic Park and the surrounding areas are set out in Policy 2.4 of the London Plan and the OLSPG. This is now being taken forward through a Local Plan prepared by the London Legacy Development Corporation (LLDC), discussed below.
- 1.2.25 The London Plan and associated Supplementary Planning Guidance (SPG) also includes a range of policies relating to new development, which the Local Plan should not seek to duplicate.

London Legacy Development Corporation

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

Overview of the Draft Local Plan

1.2.28 The structure of the Draft Local Plan is summarised below.

- ▶ Part 1: Setting the Scene - This section of the Local Plan outlines the key characteristics of the borough and some of the key issues, challenges and opportunities it faces, both now and in the future;
- ▶ Part 2: Vision and Objectives - This section sets out the long term vision of how Tower Hamlets will embrace its role as the engine of London's growth and make best use of its assets. This vision is linked to a series of overarching objectives and principles;
- ▶ Part 3 Policies - This section sets out the policies that the Council will use to guide and manage development and the use of land across the borough, covering a number of themes, including housing, economy and jobs, town centres, social infrastructure, transport and open spaces. The policies are divided into two types:
 - ▶ Spatial policies. These set out overarching principles that explain how the vision and objectives of the plan will be achieved; and
 - ▶ Development management policies. These set out general criteria that the Council will use to determine planning applications (as shown in blue and numbered with the prefix 'DM' under each topic).
- ▶ Part 4: Delivering Sustainable Places - This section of the Local Plan explains how specific areas of the borough will grow and develop over the next 15 years. It identifies the priorities and principles that will shape the future planning of these areas and a list of sites where significant housing and employment-related uses alongside key infrastructure will be accommodated;
- ▶ Part 5: Monitoring and Delivery - This section sets out a range of implementation approaches including development management, partnership working, neighbourhood planning, infrastructure delivery and development viability. It provides key monitoring indicators and targets which will be used as a basis for monitoring the effectiveness of the plan policies within the annual monitoring report;
- ▶ Part 6: Appendices - This section of the Local Plan includes a glossary of terms and abbreviations, a summary of the borough's future housing supply and a series of standards on how certain policies will be implemented.

Vision and Objectives

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

1.2.30 The proposed vision within the Draft Local Plan is:

"As the centre of London expands east, Tower Hamlets will embrace its role as a key focus for London's growth, making best use of the economic benefits from Canary Wharf, the City of London and Stratford. The connections between the borough and surrounding areas will be improved, whilst maintaining our distinct east-end identity.

This growth will be primarily delivered in the City Fringe, the Lower Lea Valley and Isle of Dogs and South Poplar and at key locations along transport corridors. The benefits of the transformation of our borough will be shared throughout Tower Hamlets, including all our residents, ensuring no one is left behind.

Tower Hamlets will continue to be home to a wide range of diverse communities. We will support our existing communities and welcome new residents to make their home within liveable, mixed, stable, inclusive and cohesive neighbourhoods, which contribute to a high quality of life and more healthy lifestyles.

These neighbourhoods will contain a broad mix of housing types, prioritising family and affordable housing, and will be served via a range of excellent, shared and accessible community, cultural and recreation facilities and infrastructure. These will be green, safe and accessible to all, promoting walking and cycling and the use of public transport as well as making best use of our network of parks and waterways, including Victoria Park, Mudchute Park and Mile End Park; the Thames and Lea rivers; and our dock basins and canals.

Neighbourhoods will be transformed with high quality buildings and well-designed spaces, while the character of the borough's 24 places that make Tower Hamlets unique will be protected and enhanced: ensuring a sensitive balance between, and integration of, old and new. High standards of environmental sustainability will result in improvements in air quality, carbon emissions, recycling and climate change mitigation. Innovative and smart technology will enhance the provision of services. This will ensure the on-going social and environmental sustainability of greater levels and higher densities of development.

Alongside high quality residential neighbourhoods, Tower Hamlets will play a significant role in London's global economy, ensuring it remains an evolving, creative and dynamic borough.

The strategic roles of Canary Wharf as a global financial and business hub and the City Fringe and Whitechapel as emerging hubs for life sciences, bio-tech and digital industries will be supported. This is alongside nurturing and developing our thriving small-and-medium enterprise sectors, properly recognising the need to support the entrepreneurial and business-focussed dynamism of many of our residents and workers, preserving our remaining industrial heritage and promoting our historic and distinctive town centres, markets and heritage and cultural attractions.

This economic growth will be sustained through the enhancement of our public transport network."

- 1.2.31 The vision acknowledges the Borough's role as a key focus for London's growth and places emphasis on the Borough's role as a home to a diverse range of communities; existing communities will be supported and new residents welcomed.
- 1.2.32 In order to deliver the vision, the Draft Local Plan proposes two key objectives to frame policies:
- ▶ Key Objective 1: Managing the Growth and Shaping Change; and
 - ▶ Key Objective 2: Sharing the Benefits of Growth.
- 1.2.33 The first objective seeks to ensure that growth contributes to identified social and economic need. The second objective seeks to ensure that growth helps reduce social, economic and environmental inequalities and promotes community cohesion. Existing health inequalities must also be reduced. Each objective is elaborated through principles and implementing considerations.

Spatial Policies and Development Policies

- 1.2.34 Spatial Policies are overarching policies that set out the strategy for a particular topic. They are supported by more detailed policies to manage development. The Local Plan includes policies on the following topics:
- ▶ Achieving sustainable growth;
 - ▶ Creating attractive and distinct places;
 - ▶ Meeting housing needs;
 - ▶ Delivering economic growth;
 - ▶ Revitalising town centres;
 - ▶ Supporting community facilities;
 - ▶ Enhancing open spaces and water spaces;
 - ▶ Protecting and managing the environment;

- ▶ Managing waste; and
- ▶ Improving connectivity and travel choice.

Sub-Area Strategies

- 1.2.35 The London Plan identifies the City Fringe/Tech City (including Whitechapel), Isle of Dogs and South Poplar, and Lower Lea Valley as Opportunity Areas and these are reflected in the Draft Local Plan, in order to ensure the proper planning of infrastructure provision across the area. In consequence, it establishes planning policies under the heading of placemaking for:
- ▶ City Fringe;
 - ▶ Central Area;
 - ▶ Lower Lea Valley;
 - ▶ Isle of Dogs and South Poplar.
- 1.2.36 At the same time, the Draft Local Plan identifies the potential for the Central part of the Borough to be treated in the same strategic manner as the Opportunity Areas. The Draft Local Plan also acknowledges that the Borough is a collection of 24 hamlets or places that sit within the Opportunity Area and the need for new development to reflect that.
- 1.2.37 The London Plan identifies a 10-year minimum housing supply target of 39,314 homes for Tower Hamlets over the period 2015-2025. This is equivalent to a minimum requirement of 3,931 homes per annum. The London Plan does not set out specific housing targets for Local Plans beyond 2025 but expects boroughs to roll forward their annual target. The Local Plan for Tower Hamlets will cover the period between 2016 and 2031 and will seek to deliver 58,965 dwellings, equivalent to 3,931 dwellings per year.
- 1.2.38 The Local Plan must also plan for future anticipated job growth in the Borough from 285,000 to 410,000 jobs by 2031.
- 1.2.39 Part 4 of the Draft Local Plan provides the policy context for growth within the four sub areas, it includes:
- ▶ An indication of the development potential of the sub area, including new homes, employment and infrastructure needs);
 - ▶ A vision for each of the sub areas;
 - ▶ A set of objectives to achieve the vision;
 - ▶ A set of development principles (covering topics like design and the historic environment and town centres and employment); and
 - ▶ Site allocations – with more detail on each of these, including anticipated land uses and infrastructure, design principles and requirements.

1.3 Scope of the Integrated Impact Assessment (IIA)

- 1.3.1 This IIA incorporates Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA). Each of these components are discussed in turn below and builds on earlier work that was reported in the previous IIA Report (November 2016).

Sustainability Appraisal (SA)

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

Strategic Environmental Assessment (SEA)

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

Health Impact Assessment (HIA)

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

Equalities Impact Assessment (EqIA)

- 1.3.6 An EqIA is not a statutory requirement but is a tool to assist the Council in complying with requirements under the UK Equality Act 2010 and Public Sector Equality Duty, which require public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. EqIA serves as a mechanism for ensuring that 'due regard' is given to minority groups in decision-making and the activities of the Council. This includes policies, procedures, projects and proposals. Legislation identifies nine protected characteristics and the EqIA considers the potential for effects on these.
- 1.3.7 The protected characteristics are:
- ▶ Gender;
 - ▶ Race;
 - ▶ Disability;
 - ▶ Sexual orientation;
 - ▶ Religion/belief;
 - ▶ Marriage and Civil Partnership;
 - ▶ Age;
 - ▶ Gender reassignment; and
 - ▶ Pregnancy / maternity.
- 1.3.8 The EqIA is presented at **Appendix H** and the approach to EqIA is discussed in **Section 2.9** of this report.

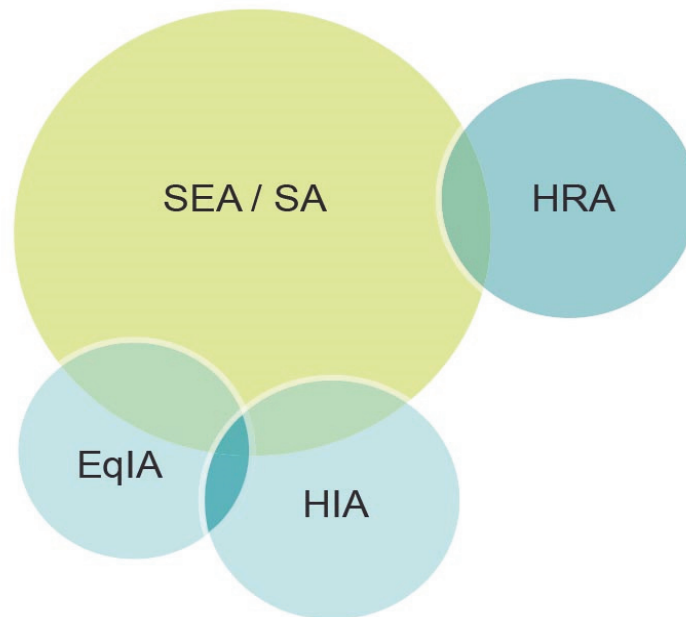
1.4 Habitats Regulations Assessment

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

Integrating the Different forms of Assessment

- 1.4.2 There are overlaps between the different forms of assessment as follows, see **Figure 1.1**:
- ▶ **HRA** – HRA requires an assessment of likely significant effects on European sites. European sites are a component of the many features that will be considered under the biodiversity topic, identified in the SEA Directive. The datasets collected will be useful to both assessment processes. The range of mitigation measures identified in the HRA in order to avoid, minimise or lessen any effects on a European site may also need assessment under the SEA Directive. Whether a plan or programme has an effect on European sites identified under the Habitats Directive is also a key consideration in determining whether the SEA Directive applies to a plan or programme;
 - ▶ **EqIA** – The SEA Directive requires consideration of issues relating to population and the datasets collected to provide a baseline for the topic will be useful to both assessment processes;
 - ▶ **HIA** – The SEA Directive requires consideration of issues relating to human health and the datasets collected to provide a baseline for the topic will be useful to both assessment processes. Potential effects on European sites will include recreational disturbance which may have an effect related to health; and
 - ▶ There are also potential overlaps between HIA and EqIA because of the nature of the topics covered.
- 1.4.3 IIA provides the opportunity for each form of assessment to inform the other, whilst ensuring that each strand of the assessment meets relevant expectations and requirements in relation to reporting.

Figure 1.1 Overlaps between the different forms of assessment



1.5 Purpose of this Report

- 1.5.1 This report accompanies the Regulation 19 draft Local Plan.
- 1.5.2 The purpose of this report is to respond to the comments made on the Scoping Report and November 2016 IIA Report, and to present the resulting revised approach to, and results of, the IIA of the Regulation 19 Draft Local Plan, including consideration of options (reasonable alternatives), where relevant.
- 1.5.3 This report complies with relevant requirements set out in the SEA Regulations and a checklist is provided at **Appendix B** to demonstrate this.

1.6 Structure of this Report.

- 1.6.1 The remainder of this report is structured as follows:
- ▶ Section 2 sets out the approach to the IIA, reviewing key information from the scoping stage and then details the approach to the different elements of the IIA;
 - ▶ Section 3 presents the results of the IIA and assessments that it covers;
 - ▶ Section 4 sets out conclusions and next steps; and
 - ▶ A separate volume of appendices contains more detailed information for the different elements of the IIA, including baseline information, relevant plans and programmes, detailed matrices etc.

1.7 How to Comment on this IIA Report

- 1.7.1 This IIA Report has been issued for consultation alongside the Draft Local Plan from 2nd October to 13th November (5pm) **2017**. Details of how to respond to the consultation are provided below.

This Consultation: How to Give Us Your Views

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

Please provide your comments by 5pm on 13th November 2017. Comments should be sent to:

By email: localplan@towerhamlets.gov.uk

By post:

FREEPOST

Local Plan Consultation

D&R Strategic Planning

London Borough of Tower Hamlets

PO Box 55739

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2. Approach to the IIA

2.1 Overview

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

2.2 Key Sustainability Issues

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

- ▶ **Housing affordability gap:** Housing has been getting less affordable in the borough. This is reflected in both high sale and private rental values. Between 2010 and 2015 house prices rose by 46% from £341,900 to £499,060. The percentage of social housing stock is also reducing and affordable housing products are diversifying and becoming more expensive. The changes to welfare provision is limiting the ability of the low paid and unemployed to live in the borough;
- ▶ **Pressure on school places:** The expected housing and population growth in the borough increase the need for school places. Current forecast is that there will be about 9,000 more 4-16 year olds needing a school place over the next 10 years. Over the extra capacity already planned for, that means the equivalent of 2-3 new primary schools. The growth in primary numbers in previous years is now feeding through to secondary schools and the borough will require 2-3 new secondary schools over the next 10 years. However fluctuating birth rates across London, as well as increasing family mobility, means that this figure will need regular revision;
- ▶ **Lack of early years / childcare places:** In 2013 the Government introduced a new statutory duty on Councils to ensure adequate provision of 15 hours of childcare for disadvantaged two year olds. The borough's demographics mean that Tower Hamlets needs to provide the highest number of places. The Council is currently under providing by 1,398 places. In 2017 the duty will increase to 30 hours for disadvantaged 2 year olds and all 3 and 4 year olds, increasing the need to provide places;
- ▶ **High health inequalities:** Residents in the borough have lower life expectancies than average, but life expectancies are improving. There are significant health inequalities amongst residents in the borough. This is reflected in the variation of life expectancies between the most and least deprived residents. Tower Hamlets has higher than average premature death rates from cancer, respiratory disease and circulatory disease;
- ▶ **Poor children's health indicators:** Children in Tower Hamlets have amongst the highest levels of obesity nationally as well as poor oral health. Vitamin D deficiency is also a concern amongst mothers and children. Lower than average percentages of children achieving a good level of development at the end of reception year at school is also a concern;
- ▶ **Relatively high levels of crime and concern about crime:** Whilst total crime figures and most crime types are reducing in the borough, the rate of crime is still higher than that for London and England. In addition, residents reported crime as the top concern in Tower Hamlets and public confidence with the police is only at 60%;
- ▶ **Pressure on transport capacity:** There is a need to increase the current and future capacity on trains, underground, overground, DLR, buses and local roads. 'Pinch points' around the borough need to be addressed, particularly those identified in the Isle of Dogs. There is a need to further encourage active modes of transport, particularly for local trips. There is a need to address road space conflicts between cyclists, pedestrians and motorists. This is particularly pertinent for 'pinch points' which have been identified through modelling;
- ▶ **Lack of open space:** Tower Hamlets has just over 232 hectares of open space which is 1.2 hectares per 1,000 residents. This is well below the National Playing Fields Standard of 2.4 hectares per 1,000. With increasing development creating new open space is a challenge;
- ▶ **Poor air quality:** Tower Hamlets produces the third highest level of total carbon dioxide emissions of the 33 Local Authorities in Greater London. Air pollution levels for the borough overall exceed targets set by the Government's Air Quality Strategy, 2007. Transport contributes to the majority of pollution in the borough. The close proximity of much of the borough to large arterial roads is of much concern, due to the impact on vulnerable groups such as children, the elderly and those with existing medical conditions. Air pollution has significant implications on health and life expectancy and is considered to be the second largest contributor to deaths after smoking;
- ▶ **Increasing rates of Fuel Poverty:** In 2013, 7.6% households in Tower Hamlets were estimated to be experiencing fuel poverty. This was an increase from the previous year, in which 7.3% of all households in the borough were estimated to be experiencing fuel poverty;

- ▶ **Rising Heat Island Effect:** London generates its own microclimate, known as the Urban Heat Island (UHI), which can result in the centre of London being up to 10°C warmer than the rural areas around London. The 2003 summer heatwave resulted in about 600 excess deaths in London.¹ The hot temperatures in 2006 resulted in extremely high demands on London's power supply network and subsequent 'brown outs', due to the high cooling demand;
- ▶ **Low levels of biodiversity:** There are large areas in the borough which are considered to have deficient access to nature and biodiversity;
- ▶ **Low recycling rates:** The Council's recycling rates are below the London average, but rising steadily. The organic recycling rate is particularly low, which reflects the relatively small amount of garden waste produced, due to the nature of the housing stock. Whilst individual local authorities no longer have borough specific recycling targets, all local authorities are working towards 50% recycling rates (the National target);
- ▶ **Pressures on waste processing capacity:** Current safeguarded waste sites are both in areas transitioning away from industrial use and into residential use through their inclusion within the Poplar Riverside Housing Zone and the Fish Island area of the LLDC. The resulting increasing land values, as well as regional and local housing targets, creates pressure for alternative use for these sites;
- ▶ **Poor water quality:** For the 3 years between 2011/12 to 2013/14 the quality of the Lower Lea has remained unchanged. The quality of the water is reported as moderate, its chemical status is moderate and ecology is poor;
- ▶ **High level of flood risk, especially in areas of expected development:** A considerable proportion of the borough is within flood zones 2 and 3 (areas of highest risk). This includes those areas expected to accommodate high levels of development, including around the river Lea and Isle of Dogs. Over a third of Tower Hamlet's surface area is covered by buildings, roads and car. This high level of surface sealing exacerbates the risk of surface water level flooding. There are four critical drainage areas identified in Tower Hamlets Lower Lee Valley, Millenium Quarter and Crossharbour, Wood Wharf and Fish Island. Development offers the opportunity to reduce flood risk in these areas;
- ▶ **High noise complaints:** The Chartered Institute of Environmental Health calculates the rate of noise complaints per thousand of population for all London boroughs. In 2013/14 in Tower Hamlets this was 22%, amongst the highest in London and above the London average of 17.4%;
- ▶ **Heritage under pressure from development:** High levels of development and associated drivers of land prices and population growth, place pressure on heritage conservation. This pressure is compounded by the borough's location on the city fringe which has a mass of tall buildings. The demand for development could result in less consideration to the impact of appropriate scale of new buildings on the wider area. The Tower of London is a UNESCO world heritage site, a status which could be threatened unless its surroundings are protected;
- ▶ **Emerging design issues:** Increasing development is raising issues around sunlight, daylight and wind effects. In addition, the borough may wish to undertake local view assessments to understand whether there are local views which should be protected, in addition to those protected by the London Plan. Finally, the opportunity areas in the borough are located in areas of high archaeological importance; and

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

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

2.3 Evolution of the Baseline

- 2.3.1 The SEA Directive requires the assessment to consider relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. The Scoping Report provided information on the current state of the baseline and trends that is included in **Appendix D** of this report.
- 2.3.2 There are two external factors that will influence planning policy in the Borough without the Local Plan: The NPPF and the London Plan. The NPPF is important, particularly Paragraph 14 which instructs that where a plan is absent, silent or out of date planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in the NPPF indicate development should be restricted.
- 2.3.3 The London Plan is important because it sets out the anticipated quantum of housing and employment development in the Borough to 2036 (housing supply monitoring targets are identified to 2025) and three Opportunity Areas City Fringe, Lower Lea Valley and Isle of Dogs & South Poplar, where significant growth is anticipated (see paragraphs 1.2.18 to 1.2.25 above).
- 2.3.4 The NPPF and the London Plan combined are likely to have a strong influence on how the Borough will develop if a Local Plan were not in place for any reason. The absence of a Local Plan would not mean that development in the Borough would come to a halt. Proposals would be considered against the London Plan (including targets for housing and employment growth) and the provisions of the NPPF, including the presumption in favour of sustainable development.

2.4 Links to other Plans and Programmes

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

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

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

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

2.6 Sustainability Appraisal of the Proposed Policies and Strategic Allocations

- 2.6.1 The SA Framework is attached as **Appendix F** to this document. It includes a set of objectives and guide questions that have been used to frame the appraisal of policies against each objective. The Draft Local Plan also contains a number of strategic sites. A set of specific, tailored criteria have been prepared to assist with the assessment of these sites against SA Objectives, helping to ensure consistency and transparency in the appraisal. **Table 2.1** sets out the scoring system used to record potential effects.
- 2.6.2 Policies have been assessed by Section (e.g. Housing, Economy and jobs, Town Centres etc.) with a separate matrix produced for each section and each policy assessed individually within that matrix. The matrix identifies potential effects for each policy and whether or not they are considered significant; for each objective there is also an opportunity to record any suggested mitigation (or changes to policy) and any assumptions and uncertainties.
- 2.6.3 The strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The exercise has been updated as part of the IIA for the Regulation 19 version of the Local Plan taking account of the design principles in the Local Plan that provide more detail on how each site should be developed. Two scores are therefore presented for each site in the detailed appraisals at **Appendix M**, the first is the score given at Regulation 18 stage and the second is the score at Regulation 19 stage, the latter takes account of any relevant development principles for the site and the extent to which these might mitigate any effects identified at Regulation 18 stage. So, for example, if the Council's requirements for a particular site include an Idea Store (a facility offering a range of services to the local community, including public computers, courses and library services) the site has been appraised on that basis. Where a site is appraised as having a potential significant negative effect in relation to SA objective 10 'Design and Heritage' because of proximity to a Conservation Area, account has been taken at the Regulation 19 stage of any relevant Development Principles for the site. The actual effect will depend on factors like scale, massing, layout, materials etc. Historic England has provided additional guidance on SA/SEA and regard has been had to this guidance in undertaking the appraisal of sites.²
- 2.6.4 The site appraisal criteria and matrices which report the outcome of this appraisal for each strategic site are presented at **Appendix M**. The findings of this appraisal are presented in **Table 3.5** and summarised thematically in **Section 3.4** of this report.

² <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf>

Table 2.1 Scoring System

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

2.7 Cumulative, Synergistic and Secondary Effects

- 2.7.1 The SEA Directive and SEA Regulations require that the secondary, cumulative and synergistic effects of the Local Plan are assessed. It will be important to consider the combined sustainability effects of the policies and proposals of the Local Plan both alone and in-combination with other plans and programmes.
- 2.7.2 Consideration has therefore been given to the potential for cumulative effects that the Local Plan policies and strategic sites could have, including the potential for in-combination effects with other plans and programmes.

2.8 Approach to the HIA

- 2.8.1 The NHS London Healthy Urban Development Unit (HUDU) has developed a Rapid Health Impact Assessment Tool (April 2017). It is designed to rapidly assess the likely health impacts of development plans and proposals, including planning frameworks and masterplans for large areas, regeneration and estate renewal programmes and outline and detailed planning applications. HUDU advise that it should be used prospectively, at the earliest possible stage during plan preparation or prior to the submission of a planning application, to inform the design, layout and composition of a development proposal.
- 2.8.2 The assessment matrix identifies eleven topics or broad determinants that make up the tool:
- ▶ Housing quality and design;
 - ▶ Access to health care and other social infrastructure;
 - ▶ Access to open space and nature;
 - ▶ Air quality, noise and neighbourhood amenity;
 - ▶ Accessibility and active travel;

- ▶ Crime reduction and community safety;
- ▶ Access to healthy food;
- ▶ Access to work and training;
- ▶ Social cohesion and lifetime neighbourhoods;
- ▶ Minimising the use of resources; and
- ▶ Climate change;

- 2.8.3 Under each topic, Section 2 of the tool identifies examples of planning issues which are likely to influence health and wellbeing and the section also provides supporting information and references.
- 2.8.4 Health impacts may be short-term or temporary, related to construction or longer-term, related to the operation and maintenance of a development and may particularly affect vulnerable or priority groups of the population. Where an impact is identified, actions should be recommended to mitigate a negative impact or enhance or secure a positive impact.
- 2.8.5 The results of the exercise are discussed in **Section 3** of this report and the completed tool is enclosed as **Appendix G**.

2.9 Approach to the EqIA

- 2.9.1 Under the Equality Act 2010 and Public Sector Equality Duty, the requirement to conduct an equality analysis is designed to provide a mechanism for ensuring that “due regard” is given to minority groups in the decision-making and activities of the Council. Specifically, a public authority must, in the exercise of its functions, have due regard to the need to:
- ▶ Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - ▶ Advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - ▶ Foster good relations between people who share a protected characteristic and those who do not.
- 2.9.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:-
- ▶ Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - ▶ Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - ▶ Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 2.9.3 The Council has developed a two-stage approach to the analysis of equality issues. The first stage (which can be repeated as a proposal develops) involves completion of a Quality Assurance Checklist. The checklist is a tool to assess that due regard is embedded and evidenced in a proposal. Further analysis may be undertaken as a natural progression from the Quality Assurance Checklist when there are concerns about the impacts of the ‘proposal’ and, or, evidencing of due regard. This more in-depth analysis is backed by formal consultation, further research, evidence, data collection and analysis.

- 2.9.4 Initial work in the November 2016 IIA focussed on completion of the Quality Assurance Checklist and determined that more detailed work was not necessary. The checklist has been updated in light of changes to the Draft Local Plan and is included in **Appendix H** of this report. **Section 3** of this report discusses the results of the exercise and whether or not more detailed work is considered necessary.

2.10 Approach to the HRA

- 2.10.1 Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') states that if a land-use plan "(a) is likely to have a significant effect on a European site³ or a European offshore marine site⁴ (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site" then the plan-making authority must "...make an appropriate assessment of the implications for the site in view of that site's conservation objectives" before the plan is given effect. The process by which Regulation 102 is met is known as Habitats Regulations Assessment (HRA)⁵. An HRA determines whether there will be any 'likely significant effects' (LSE) on any European site as a result of a plan's implementation (either on its own or 'in combination' with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site's integrity. The Borough Council has a statutory duty to prepare the Local Plan and is therefore the competent authority for the HRA.
- 2.10.2 Regulation 102 essentially provides a test that the final plan must pass; there is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options) and so the report does not provide a formal conclusion to the HRA process. However, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, and so at the Draft Plan stage potential mechanisms by which the Local Plan could affect European sites are identified and (if necessary) measures suggested to ensure significant effects do not occur. The November 2016 IIA Report included a HRA and this has been updated to reflect changes to the Local Plan.
- 2.10.3 The HRA of the Regulation 19 Draft Local Plan uses the principles of 'screening' to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the emerging plan. Screening is therefore used to 'screen-out' European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g. if sites or interest features are clearly not vulnerable (both exposed and sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways). For the Local Plan, the screening process has been used on the plan 'as a whole'; on the European sites themselves; and on the key components of the plan (the policies and allocations). The screening takes account of measures that are intended for inclusion in the plan to avoid significant effects.
- 2.10.4 The current European Commission (EC) guidance⁶ suggests a four-stage process for HRA as shown in **Box 1**, although not all stages may be necessary.

³ Strictly, 'European sites' are: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') apply; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of UK Government policy when considering development proposals that may affect them. "European site" is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

⁴ 'European offshore marine sites' are defined by Regulation 15 of *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended); these regulations cover waters over 12 nautical miles from the coast.

⁵ The term 'Appropriate Assessment' has been historically used to describe the process of assessment; however, the process is now more usually termed 'Habitats Regulations Assessment' (HRA), with the term 'Appropriate Assessment' limited to the specific stage within the process; see also Box 1.

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

Box 1 – Stages of Habitats Regulations Assessment**Stage 1 – Screening**

This stage identifies the likely impacts upon a European site of a project or plan, either alone or 'in combination' with other projects or plans, and considers whether these impacts are likely to be significant.

Stage 2 – Appropriate Assessment

Where there are likely significant effects, or effects are uncertain, then 'appropriate assessment' is required. This stage considers the impacts of the plan or project on the integrity of the relevant European sites, either alone or 'in combination' with other projects or plans, and with respect to the sites' structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.

Stage 3 – Assessment of Alternative Solutions

Where adverse impacts are predicted, this stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of European sites.

Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain

This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI). The EC guidance does not deal with the assessment of IROPI.

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

2.11 Working on the IIA

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

Who undertook the IIA and when

- 2.11.2 Along with the 'Our Borough, Our Plan: A new Local Plan first steps', the Council prepared and consulted on a draft Scoping Report for the SA of the Local Plan. The SA is incorporated in the IIA. The consultation on the Scoping Report ran from 14 December 2015 to 8 February 2016.
- 2.11.3 The IIA for the Draft Local Plan has been undertaken by Amec Foster Wheeler, working in conjunction with Council officers.
- 2.11.4 Work on the assessment stage commenced in February 2016 following completion of the Scoping Report and analysis of consultation responses by the Council with support from Amec Foster Wheeler. Responses to the Scoping Report are attached at **Appendix A**.
- 2.11.5 Other milestones to date are:
- ▶ An inception meeting in February 2016 to agree the methodology for the IIA, initial timetable, approach to integrating the IIA and plan making;
 - ▶ A workshop with officers in March 2016 on the IIA methodology and key challenges, including consideration of options and assessment of allocations;

- ▶ An initial review of emerging policies in May 2016 and a short note (for Council use only) setting out the results of this work, including recommendations; and
- ▶ An initial review of the approach to the spatial strategy and strategic allocations in July 2016 and a short note (for Council use only) setting out the implications for the Local Plan and IIA; and
- ▶ Further notes (for Council use only) on draft policies in September and October 2016;
- ▶ Draft Report and Addendum for Cabinet meeting on the 2nd November 2016 (superseded by the November 2016 IIA Report);
- ▶ Consultation on the Draft IIA Report between 11th November 2016 and 2nd January 2017;
- ▶ Work on the updated IIA to accompany the Regulation 19 Draft Local Plan (the results of which are set out in this report, which was undertaken between March and August 2017).

Comments on the IIA to Date

- 2.11.6 As outlined above, consultation took place on the Scoping Report between December 2015 and February 2016. Comments were received from the three statutory consultees (Historic England, the Environment Agency and Natural England). As a consequence, changes were made to the baseline information, plans and programmes and there was also a detailed amendment to the wording of the SA objective relating to design and heritage to better reflect national policy, see **Appendix A** for a summary of the comments received and the responses to them.
- 2.11.7 Consultation was also undertaken on the draft IIA Report between November 2016 and January 2017. Comments were received from Historic England and the Environment Agency, comments were submitted on behalf of a site owner. The comments related to the consideration of cultural heritage and flood risk in the appraisal of sites and the suitability of a site for employment and how that should be reflected in the appraisal of the site, see **Appendix A** for a summary of the comments received and the responses to them.

Difficulties Encountered in Undertaking the Appraisal

- 2.11.8 The main difficulty (or area of uncertainty) reported in November 2016 related to the Strategic Sites and the mix of uses they might accommodate, particularly employment. At that time this was not specified so it was difficult to assess sites against relevant objectives. The Council's view was that there were other policies in the Draft Local Plan that would be used to secure employment on such sites. One of the recommendations in the 2016 IIA Report was that the Local Plan should provide more detail about the mix of uses on strategic sites as this would assist the IIA but also help demonstrate that the plan meets the requirements of the NPPF. The Council has provided further clarity about the mix of uses to be provided on strategic sites (including employment) helping to address this area of uncertainty, although the amount of employment space to be provided on each strategic site has not yet been indicated in the Local Plan. Uncertainties and assumptions common across the appraisal are outlined below:

Uncertainties

- ▶ The exact composition and design of future development proposals, including height, density and massing is unknown and would be subject to planning approval;
- ▶ The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market), the nature and scale of any relocation of existing employment on site and the recruitment policies of prospective employers;
- ▶ The level of investment in community facilities and services that may be stimulated by new development is uncertain at this stage and will in part be dependent on site specific proposals and whether or not development will come forward;

- ▶ The exact scale of greenhouse gas emissions associated with the implementation of the policies and proposals contained in the Regulation 19 Draft Local Plan will be dependent on a number of factors including: the exact design of new development; future travel patterns and trends; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period; and
- ▶ The exact scale of waste arisings associated with the Local Plan will be dependent on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse.

Assumptions

- ▶ It is assumed that the Council will continue to liaise with Thames Water with regard to infrastructure requirements for future development;
- ▶ Measures contained in Thames Water's Water Resource Management Plan would be expected to help ensure that future water resource demands are met;
- ▶ It is assumed that, where appropriate, development proposals would be accompanied by a Flood Risk Assessment (FRA) and that suitable flood alleviation measures would be incorporated into the design of new development where necessary to minimise flood risk; and
- ▶ In accordance with the requirements of the London Plan (Policy 7.14 'Improving Air Quality') it is assumed that new development will be at least air quality neutral.

3. Appraisal of Effects

3.1 Introduction

- 3.1.1 This section sets out the key findings from the various assessments undertaken on the Draft Local Plan and should be read in conjunction with the information set out in the accompanying appendices.

3.2 Sustainability Appraisal

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

Consideration of Reasonable Alternatives

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

Options for the Spatial Strategy

- 3.2.7 There are however options in relation to how the Draft Local Plan reflects the London Plan. The intention is that the new Tower Hamlets Local Plan will move away from the Core Strategy's '24 places' approach (the hamlets that make up the Borough) to one based on four broader sub areas in the Borough and within which the 24 places would sit. These areas recognise the three existing regional spatial designations from the London Plan: the City Fringe; the Isle of Dogs and South Poplar; and the Lower Lea Valley. A new designation for the Central Area is also proposed, although this would not have the same status as the Opportunity Areas identified in the London Plan.
- 3.2.8 The Council identified 3 options for delivering the Plan vision, which were considered at the Regulation 18 stage in the November 2016 IIA Report. These are reported here in order to demonstrate that reasonable alternatives have been considered. The 3 options assessed were as follows:
- ▶ Option 1: Maintain the existing 24 places;
 - ▶ Option 2: Take forward the London Plan's designated Opportunity Areas as sub areas; and
 - ▶ Option 3: Merge Option 1 and 2 and designate the remaining part of the Borough as the central sub-area.
- 3.2.9 **Table 3.1** below sets out the appraisal of alternative approaches to delivering the vision that was presented in the 2016 IIA Report. All three options were assessed as making a significant contribution to all SA objectives. However, Option 1 has uncertainties associated with SA objectives that would benefit from a more strategic approach, for example in relation to strategic infrastructure provision that serves more than one place. Option 2 from a Borough perspective also performs similarly in some instances because it is focussed on the Opportunity Areas, so might miss opportunities to address Borough wide needs or the needs of areas outside of the Opportunity Areas. Option 3, meanwhile, would enable planning at the Borough (and cross-borough level) for key infrastructure but also ensure that local character is respected across the Borough. In terms of helping to plan for, and deliver, infrastructure relevant objectives include SA objective 5 'Transport' and the growth anticipated in the London Plan, SA objective 8 'Economic Growth.' Option 3 is judged to be the better performing option against this consideration. SA objectives where it is arguable that the 24 Places approach might perform better include SA objective 10 'Design and Heritage' because it would encourage sensitivity to existing characteristics.
- 3.2.10 The Council indicated (at the Regulation 18 stage) that its preferred approach is Option 3 because it will help plan for growth and ensure that key infrastructure is delivered. General policies in the Local Plan will be important in setting out the requirements for development in areas that are more sensitive to development under the sub area approach.
- 3.2.11 The proposed approach in the spatial strategy aligns the Local Plan with the approach in the London Plan regarding opportunity areas for the City Fringe, Lower Lea Valley and the Isle of Dogs and South Poplar. Furthermore, the approach will help ensure that the new Tower Hamlet's Local Plan will be in conformity with the London Plan. The three regional spatial designations provide an opportunity to take a more strategic approach to development and the provision of necessary infrastructure and it is anticipated that proposals will be detailed in the Opportunity Area Planning Frameworks (OAPFs) for each area. The new Central Area designation also provides the opportunity to shape emerging strategy in the London Plan, i.e. by advancing the case for a new Opportunity Area, or at least ensuring that its needs (in terms of infrastructure etc.) are acknowledged in the London Plan.
- 3.2.12 The change in emphasis from 24 places to 4 sub areas might possibly lead to concerns around the loss of local identity and character that the Core Strategy emphasised through the hamlets based approach. However, the draft Local Plan acknowledges that the 24 places sit within the 4 areas (and it is clear that the intention is not to lose the locally distinctive places). Whilst the OAPFs provide an opportunity to consider local character in more detail (2 are already complete) they are non-statutory documents.

- 3.2.13 The November 2016 IIA Report suggested that one way to offset concerns in relation to impact on local character would be for the spatial strategy to recognise the role that Neighbourhood Planning could play in shaping development. It was noted that Wapping, East Shoreditch, Limehouse, Isle of Dogs and Spitalfields (Business Area) have been designated as neighbourhood areas and that the Local Plan acknowledges these. The Regulation 18 Local Plan was amended by the Council and under Key Objective 2 of the Draft Local Plan, a commitment to support the process of Neighbourhood Planning was added. This has been carried through to the Regulation 19 version of the Local Plan. Equally there are general policies proposed in the Local Plan that seek to protect and enhance neighbourhood centres and facilities so the Local Plan provides the framework for planning that can inform the OAPFs and planning at the neighbourhood level in areas where Neighbourhood Plans are absent.
- 3.2.14 The November 2016 IIA concluded that the 'choice' between the 24 places approach and the 4 strategic areas was not anticipated to have any implications for the scale and distribution of development across the Borough, which would reflect the provisions in the London Plan. The significant economic, social and environmental effects associated with both choices were therefore considered to be similar. The relationship between the 24 places and 4 strategic areas can be likened to Russian dolls, with the places sitting within the 4 strategic areas. The key will be to ensure that the 4 strategic areas approach is implemented sensitively, with development respecting the place within which development is to be accommodated. The objectives and general policies in the Local Plan provide the opportunity to ensure that this is done, as do the OAPFs and Neighbourhood Development Plans (NDPs).

Table 3.1 SA of Alternative Options for Delivering the Local Plan Vision

SA Objective	Commentary	Option		
		Option 1: 24 Places Approach Acknowledging the Opportunity Areas in the London Plan	Option 2: Take Forward London Plan's Opportunity Areas as sub areas	Option 3: Merge Option 1 and 2 and designate the remaining part of the Borough as the Central Sub Area
1. Equality: Reduce poverty and social exclusion and promote equality for all communities.	All alternatives could contribute, Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 could provide a better basis for securing and co-ordinating investment through the Infrastructure Delivery Plan across the whole of the Borough.	+++/?	+++/?	++
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 might encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to public transport and infrastructure across the Borough.	++	+++/?	++
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.	Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 would encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to green grid and health related infrastructure.	++	+++/?	++
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	All options are considered to make a significant contribution towards this objective.	++	++	++
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Option 3 could perform better than Option 1 and 2 in terms of analysing capacity issues and securing strategic transport infrastructure across the Borough.	+++/?	+++/?	++
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	Option 1 could be more sensitive to local needs. Option 2 would focus on the Opportunity Areas. Option 3 might encourage/enable a more 'joined up' approach to planning for neighbourhoods, e.g. in relation to secondary education provision.	+++/?	+++/?	++
7. Employment: Reduce worklessness and increase employment opportunities for all residents	All options are considered to make a significant contribution towards this objective.	++	++	++

SA Objective	Commentary	Option		
		Option 1: 24 Places Approach Acknowledging the Opportunity Areas in the London Plan	Option 2: Take Forward London Plan's Opportunity Areas as sub areas	Option 3: Merge Option 1 and 2 and designate the remaining part of the Borough as the Central Sub Area
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Option 1 (the 24 Places Approach) would need to acknowledge the areas of economic growth within the Borough that are identified in the London Plan. Options 2 and 3 align to the opportunity Areas.	+++/?	++	++
9. Town Centres: Promote diverse and economically thriving town centres.	All options are considered to make a significant contribution towards this objective.	++	++	++
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Option 1 could be more sensitive to local needs.	++	+++/?	+++/?
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	Option 1 could be more sensitive to local needs, Option 2 might focus on the Opportunity Areas but Option 3 could encourage/enable investment in the green grid on a more strategic, cross borough basis.	+++/?	+++/?	++
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Arguable that the Council's carbon off-setting scheme could operate under either of these scenarios but Option 3 provides the basis for planning for strategic flood infrastructure.	+++/?	+++/?	++
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Option 1 could be more sensitive to local needs but Option 3 could encourage/enable investment in the green grid on a more strategic, cross borough basis.	+++/?	+++/?	++
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste	Option 1 could be more sensitive to local needs but Option 3 could encourage/enable planning for Borough wide schemes.	+++/?	+++/?	++
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Option 3 provides the basis for planning for strategic flood infrastructure in an integrated and comprehensive way across the Borough.	+++/?	+++/?	++
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	All options are considered to make a significant contribution towards this objective.	++	++	++

Policy and Strategic Site Options

- 3.2.15 Developing policy options is limited by the need to be in compliance with the NPPF and other national policy and also the London Plan. Consistent with the need for conformity, the Council has given consideration to each policy topic and the options (if any) available. The options identified and how they have been treated in the SA are set out in **Appendix J**. This work was first reported in the November 2016 IIA but is included in this report to assist those who wish to comment on the IIA.
- 3.2.16 Policy options have been appraised against the 16 SA objectives and in accordance with the methodology set out in Section 2 of this Report. The results of the appraisal are summarised in the following relevant sub-sections, with commentary focussing on any notable differences in performance against the SA objectives. A set of matrices that record the detailed appraisal is attached at **Appendix K**.
- 3.2.17 A general observation is that some of the options considered in the November 2016 IIA Report, e.g. appropriate mix of retail units in a frontage or the proportion of different types of housing, are detailed in nature. The SA objectives are high level objectives and so appraising detailed options against high level objectives means that there are not necessarily discernible differences between the options in SA terms. In this regard, the role of the SA is not to select options but to inform their selection; options may be preferred for a range of planning related reasons.

3.3 Vision and Objectives

- 3.3.1 The vision is set out at page 14 of the Draft Local Plan (and contained in this IIA report at paragraph 1.2.30).
- 3.3.2 The vision recognises the role of Tower Hamlets in the wider London context, making the positive case for sustainable growth and realising the associated economic and community benefits while at the same time ensuring the current Borough's distinctive identity and character are maintained. The vision identifies preferable locations for housing and economic development, outlines expected standards and sustainability outcomes and provides the infrastructure to enable it to happen.
- 3.3.3 The vision is supported by two key objectives, with each objective supported by a number of principles and the means through which they will be implemented. **Table 3.2** presents a high level gap analysis of the Draft Local Plan objectives and principles against the IIA objectives, and specifically identifies those IIA objectives that will be supported. Its completion should also help identify any areas of re-enforcement and any potential conflicts between objectives. This work was first undertaken in the November 2016 IIA Report but has been updated to reflect minor changes in the wording of the vision and objectives.

Table 3.2 Local Plan Objectives and IIA Objectives

Objective and Principles	Implemented through	Supports the following IIA Objectives
<p>Objective: Managing growth and shaping change</p> <p>Principles: Growth must contribute positively to existing, identified, social, economic and environmental needs</p> <p>Growth must be delivered alongside social and transport infrastructure, recognising that without provision of adequate infrastructure growth cannot be supported.</p> <p>Growth must be balanced, containing employment, retail and community facilities, alongside increasing residential development</p> <p>Growth must be well designed and enhance local distinctiveness, ensuring old and new are properly integrated</p> <p>Growth must respect, protect and enhance our environment</p> <p>Growth must optimise the use of the best available technological innovations</p>	<ol style="list-style-type: none"> 1. delivering Tower Hamlets' role as a key location for London's housing and employment growth, while seeking to overcome constraints to sustainable growth through regional and national investment prioritisation; 2. positively meeting our duties to deliver our strategic and local housing needs linked to effective infrastructure planning and delivery; 3. securing the timely provision of sufficient infrastructure to meet current and future needs, taking account of the cumulative impact of future development, especially in deficient areas; 4. supporting additional transport enhancements, such as an Eastern Branch to Crossrail 2, increased river crossing capacity and strategic intervention and investment to support growth the Isle of Dogs and Lower Lea Valley, prioritising walking, cycling and the use of public transport; 5. protecting a range of land uses (including a wide range of employment spaces, shops, leisure and community facilities) to support a truly mixed-use borough; 6. making the best use of our available land (through encouraging the co-location of uses, shared facilities, integrated infrastructure, the delivery of pocket parks) and ensuring connectivity between places; 7. Strengthening the role of our town centres to encourage a broad range and mix of uses and activities and meet the needs of users; 8. creating walkable communities where residents, visitors and workers can easily access shops, services and facilities within town centres and neighbourhood centres; 9. protecting the uses, spaces and places, including water spaces, which make the borough unique; 10. delivering successful place making, which preserves heritage assets, enhances local distinctiveness, character and townscapes; 11. encouraging the use of innovative building types and technologies in suitable locations and where they provide sustainable high quality internal and external living environments; 	<p>4 Housing, 5 Transport and Mobility, 7 Employment, 8 Economic growth, 9 Town Centres</p> <p>2 Liveability, 4 Housing, 5 Transport and Mobility</p> <p>2 Liveability 5 Transport and Mobility</p> <p>4 Housing, 5 Transport and Mobility, 7 Employment, 8 Economic growth, 9 Town Centres</p> <p>2 Liveability, 4 Housing, 5 Transport and Mobility, 7 Employment, 8 Economic growth, 9 Town Centres</p> <p>2 Liveability, 5 Transport and Mobility, 11 Open space</p> <p>2 Liveability, 5 Transport and Mobility, 9 Town Centres, 14 Natural resources</p> <p>2 Liveability, 5 Transport and Mobility, 9 Town Centres.</p> <p>2 Liveability, 7 Employment, 8 Economic growth, 9 Town Centres, 10 Design and heritage, 13 Biodiversity,</p> <p>2 Liveability, 7 Employment, 8 Economic growth, 9 Town Centres, 10 Design and heritage, 13 Biodiversity,</p> <p>2 Liveability, 12 Climate change, 13 Biodiversity, 14 Natural resources</p>

Objective and Principles	Implemented through	Supports the following IIA Objectives
<p>Objective: Sharing the benefits of growth</p> <p>Principles: Growth must deliver social, economic and environmental net gains jointly and simultaneously and reduce inequalities by benefiting the lives of existing residents</p> <p>Growth must promote community cohesion, ensuring the accessibility of spaces, places and facilities</p> <p>Growth must enable community leadership and engagement</p> <p>Growth must bring an improved quality of life, health benefits and reduce health inequalities</p>	<ol style="list-style-type: none"> 12. requiring developments to reach the highest standards of environmental sustainability and deliver a robust built environment which is designed to adapt to, and reduce the effects of, climate change; 13. achieving a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025; 14. addressing poor air quality through a range of solutions, including a continuing modal shift away from polluting vehicles including through traffic. 1. reducing existing spatial inequalities and barriers and preventing the future polarisation of areas or communities, through optimising regeneration opportunities, in particular in the Lower Lea Valley, Isle of Dogs and South Poplar; 2. maximising opportunities to create a more connected and well-managed network of open spaces, habitats and waterways via new and improved green links and spaces (including the Leaway and Whitechapel Greenspace) and public realm works; 3. ensuring housing development contributes to the creation of socially balanced and inclusive communities and offer housing choice reflecting the Council's priorities for genuinely affordable and family homes; 4. helping to close the current skills gap, through improving access to education and training and increasing the mix of employment sectors. 5. optimising the economic benefits from the borough's proximity to world-class visitor attractions (including the Tower of London World Heritage Site) and encouraging visitors to explore more of the borough; 6. creating buildings, streets, spaces and places which promote social interaction and inclusion, which are accessible to all and which people value, enjoy and feel safe and comfortable in. 7. maximising the benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf, acting as a catalyst for investment; 8. delivering healthy streets and neighbourhoods that promotes active and healthy lifestyles and recreation and enhances people's wider health and well-being; and 9. enabling all residents to be involved within the planning system at the earliest opportunity, through consultation; making the process more transparent and accessible; and by providing support for the process of Neighbourhood Planning. 	<p>2 Liveability, 12 Climate change, 14 Natural resources</p> <p>12 Climate change, 14 Natural resources</p> <p>3 Health and wellbeing, 13 Biodiversity</p> <p>1 Equality, 2 Liveability, 4 Housing, 5 Transport and Mobility, 7 Employment, 9 Town Centres 10 Design and heritage, 16 Contaminated land</p> <p>2 Liveability, 13 Biodiversity, 14 Natural resources</p> <p>1 Equality, 2 Liveability, 4 Housing</p> <p>1 Equality, 6 Education, 7 Employment, 8 Economic growth</p> <p>7 Employment, 8 Economic growth, 9 Town Centres 10 Design and heritage</p> <p>1 Equality, 2 Liveability, 5 Transport and Mobility</p> <p>2 Liveability, 3 Health and wellbeing, 5 Transport and Mobility, 7 Employment, 9 Town Centres, 12 Climate change,</p> <p>1 Equality, 2 Liveability, 3 Health and wellbeing, 5 Transport and Mobility</p> <p>1 Equality 2 Liveability, 3 Health and wellbeing.</p>

- 3.3.4 **Table 3.2** suggests that collectively, all the IIA objectives are supported by the Local Plan objectives and principles and no gaps are identified.
- 3.3.5 A recommendation arising from this review in the November 2016 IIA was that the Local Plan could also signpost the policies that are considered to support each of the principles and associated implementation points. The amended Regulation 19 version of the Local Plan includes key policy linkages.

3.4 Sustainability Appraisal of the Draft Local Plan Policies

- 3.4.1 The policies as presented in the Regulation 19 Draft Local Plan have been appraised by the topic section in which they appear and the results are presented in **Appendix L**. This builds on earlier work undertaken at Regulation 18 stage but reflects changes to policy numbering and titles, as well as the content of policies. The results are summarised below. Where relevant, the options considered at the Regulation 18 stage under each policy topic are identified and the results of the previous appraisal presented.

Achieving Sustainable Growth

- 3.4.2 This chapter of the Draft Local Plan contains two spatial policies and three development management policies. Spatial Policy S.SG1 'Areas of growth and opportunity within Tower Hamlets' confirms the spatial strategy for the Borough, sets out requirements in relation to significant new infrastructure and cross references the design and delivery principles for key areas that are provided later in the Local Plan. 'Policy S.SG2 'Delivering sustainable growth in Tower Hamlets' sets out a holistic approach to deliver sustainable development and growth; it is intended to underpin the vision and the two key strategic objectives discussed in Section 1.2 of this report. Policy D.SG3 'Health Impact Assessments' sets out the requirement for HIA for specified developments. Given the scale of development envisaged in the Borough, Policy D.SG4 'Construction of new development' seeks to ensure that issues associated with construction are managed and where appropriate mitigated. Policy D.SG4 was included in the Local Plan following an early recommendation from the IIA team. Policy D.SG5 'developer contributions' sets out the approach to seeking contributions from developers to fund improvements to infrastructure and the environment. This policy was included in the Regulation 18 Local Plan but has been relocated.

Consideration of Options

- 3.4.3 No specific options relating to this topic were identified.

Appraisal of Policies

- 3.4.4 Policy S.SG1 confirms that development will be directed towards the opportunity areas, consistent with the London Plan and highly accessible locations along transport corridors. Minor positive effects are identified for this policy across a number of objectives, including SA objective 1 on Equality, objective 2 'Liveability' and 11 on Open Space on the basis that the policy directs development to locations with good accessibility and sets out the requirement to deliver key infrastructure that will contribute to these objectives.
- 3.4.5 Significant positive effects are anticipated for policies S.SG2 and D.SG4 in relation to SA objective 2 'Liveability' for different reasons. Policy S.SG2 sets out requirements for infrastructure provision and high quality design, which would directly contribute to this SA objective through ensuring appropriate infrastructure is provided alongside development proposals and through the promotion of a high quality public realm. Policy D.SG4 requires development proposals to consider and reduce any cumulative amenity impacts arising during their construction phase. This would directly contribute to this SA objective through ensuring adequate mitigation of construction related noise, vibration and pollution impacts.
- 3.4.6 Significant positive effects are also anticipated for both policies S.SG2 and D.SG4 in relation to SA objective 16 'Contaminated Land' as both policies will ensure that potential impacts on human

health associated with remediation of land and the construction phase are assessed at the project level.

- 3.4.7 In relation to SA objective 4 'Housing', Policy S.SG2 requires development proposals to be of a high quality design and to deliver tenure blind housing. Policy S.SG2 also highlights the need for development to consider a range of other factors, so significant positive effects are identified in relation to SA objective 10 'Design and Heritage'.
- 3.4.8 Policy D.SG5 on developer contributions is assessed as making a minor positive contribution to a range of SA objectives, by securing investment for community facilities, open space, health facilities, affordable housing and employment and training facilities, public art, biodiversity, energy and sustainability infrastructure and transport and highways improvements that cannot be secured through other arrangements. It does this by providing a link between the Local Plan, policy documents in relation to planning contributions and future development.
- 3.4.9 The requirement for HIA was previously included in the Regulation 18 Local Plan and the November 2016 IIA recommended that the supporting text could reference the Healthy Urban Development Unit's '(HUDU) Healthy Urban Planning Checklist'. The supporting text to the new policy (D.SG4) references the HUDU checklist.
- 3.4.10 It was previously suggested in work directly for the Council that the policy for sustainable growth references the need for development to help prevent anti-social behaviour, reduce fear of crime and improve public safety through design. These principles were incorporated into the Regulation 18 Local Plan and have been carried forward into the Regulation 19 version of the Local Plan in Policy D.DH2.

Creating Attractive and Distinctive Places

- 3.4.11 This chapter of the Draft Local Plan contains a set of policies relating to design and the historic environment. As follows:
- ▶ Policy S.DH1: Delivering high quality design
 - ▶ Policy D.DH2: Attractive streets, spaces and public realm
 - ▶ Policy S.DH3: Heritage and the historic environment
 - ▶ Policy D.DH4: Shaping and managing views
 - ▶ Policy S.DH5: World heritage sites
 - ▶ Policy D.DH6: Tall buildings
 - ▶ Policy D.DH7: Density
 - ▶ Policy D.DH8: Amenity
 - ▶ Policy D.DH9: Shopfronts
 - ▶ Policy D.DH10: Advertisements, hoardings and signage
 - ▶ Policy D.DH11: Telecommunications

Consideration of Options

- 3.4.12 Options in relation to the location of tall buildings (D.DH6 'Tall Buildings') and housing density (D.DH7) were considered by the Council at Regulation 18 stage and these are discussed in turn below.

Tall Buildings

- 3.4.13 Two options relating to the location of tall buildings were considered (see **Appendix K**):

- ▶ Option 1: Identify suitable tall building zones in the Central Activities Zone (CAZ), Canary Wharf Major Centre and Activity Area and apply a step down approach from the zone; and
- ▶ Option 2: Maintain existing approach to managing building heights in accordance with the town centre hierarchy.

3.4.14 Consideration against the SA objectives suggested that both options could contribute towards liveable neighbourhoods (Objective 2) by ensuring that development is of an appropriate scale. There could be pressure for taller buildings in town centres under Option 2 hence some uncertainty was identified against this objective.

3.4.15 Creating clusters of tall buildings at specified locations (Option 1) was identified as providing potential benefits associated with SA objective 6 'Economic Growth'.

3.4.16 The main difference between the performance of the options related to SA Objective 10 'Design and heritage.' Directing tall buildings to identified zones and requiring them to step down towards the edge of a specified area (Option 1) was considered to contribute positively to this objective. It is recognised that both options could require buildings to be of a height, scale, mass and volume that are proportionate to location and this could be easier to achieve in the tall building zones.

3.4.17 The Council indicated that its preferred approach is Option 1 (see **Appendix J** for reasoning).

Density

3.4.18 Two options relating to density were considered:

- ▶ Option 1: Provide further guidance to maintain densities that exceed the London Plan's Density Matrix; and
- ▶ Option 2: Adopt a locally specific density matrix to manage the scale of development.

3.4.19 The findings of the assessment of both options (at **Appendix K**) suggests that there would be little to differentiate between the two options whilst the performance of Option 2 would depend on the detail of the local matrix (relative to the London Plan Density matrix).

3.4.20 The Council chose Option 1 (see **Appendix J** for reasoning).

Appraisal of Policies

3.4.21 Policies will have a significant positive effect in relation to SA Objective 2 'Liveability'. For example, Policy S.DH1 and Policy D.DH2 require development proposals to demonstrate good placemaking principles and high quality architecture, urban and landscape design. This would ensure that developments provide permeable, multi-functional and connecting street infrastructure and high quality public realm provision, such that these policies directly contribute to this SA objective.

3.4.22 Policies will also have a significant positive effect in relation SA Objective 3 'Health and well-being' by promoting a range and mix of high-quality, publicly accessible green spaces.

3.4.23 Policy D.DH2 will have a significant positive effect in relation to SA Objective 5 'Transport'. It requires development proposals to improve connectivity to public transport hubs, town centres, open spaces and social and community facilities. This would help ensure that streets and wider transport networks function efficiently, as well as encouraging active travel modes, reduced car travel and sustainable modal shifts. Consequently, the policy would have a significant positive effect on this SA objective.

3.4.24 Policy S.DH1 and D.DH2 will have a significant positive effect in relation to SA Objective 8 'Economic Growth'. This is on the basis that enhancements to the public realm encouraged by the policies would help create the climate for retaining and attracting employment related activity. Similarly, the policies will have a positive effect in relation to SA Objective 9 'Town Centres' as providing an attractive built environment will help maintain their vitality.

- 3.4.25 All of the policies are assessed as having a significant positive effect in relation to SA Objective 10 'Design and Heritage'. Spatial Policy S.DH1 has criteria that will help protect built heritage. Policies S.DH3 'Heritage and the Historic Environment', Policy D.DH4 'Shaping and managing views' and S.DH5 'World heritage sites' set out criteria to protect a range of recognised heritage assets. The other policies of this section require development proposals to achieve high architectural, urban design and placemaking standards, positively contribute to townscape character and the public realm and adequately protect the amenity of adjacent sites and the public. All of the policies therefore directly contribute to this SA objective and would have a significant positive effect on it through ensuring that development proposals are appropriately sited, designed and integrated with their surroundings.
- 3.4.26 In relation to SA Objective 11 'Open Space', a significant positive effect is anticipated. Policy S.DH1 requires development proposals to provide a mix and range of publically accessible open spaces. This would increase high quality open space provision, resulting in a significant positive effect on this SA objective.
- 3.4.27 Policy S.DH1 requires developments to provide a mix and range of publically accessible open spaces that promote biodiversity, health and well-being. As such, the policy has been assessed as having a significant positive effect on SA objective 11 'Open space.' Policy D.DH2 seeks to improve connectivity to open spaces. This would also directly contribute to SA objective 11.
- 3.4.28 Policies also make significant positive contributions in relation to biodiversity, flood risk, natural resources and contaminated land.
- 3.4.29 A suggestion was made at the Regulation 18 stage in relation to policies on the historic environment included in the Local Plan at that stage. The recommendation stemmed from a concern that the structure and content of the policies did not reflect the language and principles set out in the NPPF at paragraphs 132 to 134 and paragraph 138 in relation to the significance of designated heritage assets and their conservation, the concepts of substantial and less than substantial harm. It is noted that Policy S.DH3 'Heritage and the historic environment' now adopts the terminology in the NPPF.

Meeting Housing Needs

- 3.4.30 This chapter of the Draft Local Plan contains a set of policies relating to housing. Policy S.H1 is concerned with meeting housing needs. Other policies are as follows:
- ▶ Policy D.H2 'Affordable housing';
 - ▶ Policy D.H3 'Housing standards and quality';
 - ▶ Policy D.H4 'Specialist housing';
 - ▶ Policy D.H5 'Gypsies and travellers accommodation';
 - ▶ Policy D.H6 'Student housing'; and
 - ▶ Policy D.H7 'Housing with shared facilities (houses in multiple occupation)'.

Consideration of Options

- 3.4.31 Options were identified at the Regulation 18 stage in relation to tenure split for housing (Policy D.H2), the mix of bedrooms (Policy D.H2) and ceiling height (Policy D.H3).

Tenure split

- 3.4.32 Tenure split relates to the balance between social and affordable rent and intermediate rent or sale. Three options were considered:
- ▶ Option 1: Adopt a London Plan compliant tenure split of 60/40 for social and affordable rent and intermediate rent or sale respectively;

- ▶ Option 2: Maintain existing tenure split policy of 70/30 for social and affordable rent and intermediate rent or sale respectively; and
- ▶ Option 3: Adopt a new tenure split of 80/20 for social and affordable rent and intermediate rent or sale respectively.

3.4.33 The assessment suggested that all three options would make a significant contribution to a range of SA objectives, including: 1 'Equality', 3 'Health and Well Being', 4 'Housing,' and 8 'Economic Growth'. However, uncertainties were identified in relation to Option 1 across these objectives because it would not reflect the scale of local need. Option 3 performed well against the SA objectives but it is considered that a 70/30 split would be preferable given the scale of local need (See **Appendix K** for details).

3.4.34 The Council chose Option 2 (see **Appendix J** for reasoning).

Mix of bedrooms

3.4.35 The Council considered three options in relation to the mix of bedrooms in new developments:

- ▶ Option 1: Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all three tenures (social and affordable / intermediate and market);
- ▶ Option 2: Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds across all affordable housing tenures (social and affordable / intermediate); and
- ▶ Option 3: Adopt a new mix of 1 beds, 2 beds, 3 beds and 4 beds in the social and affordable tenure only.

3.4.36 The findings of the appraisal of the options indicate that all three options would make a significant contribution to a range of SA objectives, including: 1 'Equality', 3 'Health and Well Being', 4 'Housing', and 8 'Economic Growth'. However, uncertainties were identified in relation to Option 3 across these objectives because it would not include intermediate housing (See **Appendix K** for details).

3.4.37 The Council chose Option 2 (see **Appendix J** for reasoning).

Ceiling Height

3.4.38 Three options relating to ceiling height were considered by the Council:

- ▶ Option 1: To apply the nationally described space standards for floor to ceiling height of 2.3 m;
- ▶ Option 2: To apply the London Plan approach of strongly encouraging a floor to ceiling height of 2.5m; and
- ▶ Option 3: To require a local standard of 2.5m floor to ceiling height.

3.4.39 Arguably, Option 1 is not a reasonable alternative because it does not comply with the London Plan but it has been assessed on a precautionary basis.

3.4.40 The appraisal of the three options contained at **Appendix K** highlights the potential for positive effects associated with options 2 and 3. These positive effects relate to SA objectives 1 'Equality', 2 'Health and Well-being', 4 'Housing' and 12 'Climate change'. Uncertainties are identified in relation to Option 2 as the nature of the wording means that outcomes would be uncertain. The potential for minor potential negative effects were also identified for Option 1 in relation to the same objectives, e.g. a lower ceiling height in predominantly flatted development might inhibit cooling and impact on mental health.

3.4.41 The Council chose Option 3 (see **Appendix J** for reasoning).

Assessment of Policies

- 3.4.42 These policies include the housing target to 2031, an overall strategic target for affordable housing of 50%, delivery mechanisms to meet these targets, quality standards for residential development proposals and criteria for specialist housing provision. The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by resisting development that would involve a net loss of residential floorspace, ensuring delivery of affordable housing, prioritising the regeneration of existing housing estates, directing new housing to accessible locations and providing specialist housing where required (which could indirectly increase the availability of and or reduce land value pressures on general purpose housing for local residents).
- 3.4.43 All of the policies are judged to make a significant positive contribution to SA objective 1 'Equality' and SA objective 3 'Health' as all of these policies would help to reduce poverty, social exclusion and fuel poverty. Policy S.H1 'Meeting housing needs' includes measures to ensure that estate regeneration schemes meet housing need.
- 3.4.44 Significant positive effects are also anticipated in relation to SA objective 2 'Liveability'. Policy S.H1, D.H4, D.H5, D.H6 and D.H7 direct residential developments, including for specialist housing, to areas with high accessibility, the potential to accommodate high densities (including areas with existing high densities), suitable infrastructure provision and open space. Policy D.H3 requires residential developments to protect existing and provide new amenity and play spaces. Through providing well designed residential developments in accessible locations these policies would improve access to local services, facilities and amenities, promote the development of a high quality public realm and ensure appropriate infrastructure provision.
- 3.4.45 All of the policies are assessed as having a significant positive effect in relation to SA objective 4 'Housing'. The policies would result in the provision of suitable housing of all types to meet identified needs, in particular by ensuring increased delivery of affordable housing and an appropriate range and mix of housing, prioritising the regeneration of existing housing estates, providing specialist housing and requiring good housing design standards to be met.
- 3.4.46 The provision of housing will help support economic growth across the Borough. Sustained levels of increased housebuilding would also directly increase construction related economic activity and employment in line with SA objective 8 'Economic Growth'.
- 3.4.47 In terms of SA objective 11 'Open Space', Policy D.H3 sets minimum open space standards for residential developments and safeguards existing amenity space, therefore directly contributing to this SA objective.
- 3.4.48 A number of positive effects have been noted in relation to the provision of housing in the Borough but uncertainties towards the end of Local Plan period exist. The London Plan (GLA, 2016) identifies a ten-year minimum housing supply target of 39,314 homes within Tower Hamlets over the period 2015-2025. This is equivalent to a minimum requirement of 3,931 homes per annum. The London Plan does not set out specific housing targets beyond 2025 but expects boroughs to 'roll forward' their annual target.
- 3.4.49 The London Plan ten-year target, plus the annual rolled forward target, results in a housing supply target for the borough (2016 – 2031) of 58,965 homes. This target is greater than the objectively assessed need for the Borough of 46,458 homes. This reflects the fact the Borough is expected to significantly contribute towards meeting London's strategic housing need.
- 3.4.50 The Local Plan has identified capacity for 53,063. However, the Borough Council anticipates that through normal plan delivery over the plan period sufficient additional units can be delivered to meet the London Plan target. This is due to factors which due to uncertainties and assumptions relating to supply which have not been factored into the trajectory such as higher-than-average density levels and delivery rates due to the extent of development interest in the borough and the emergence of new delivery mechanisms (e.g. new council-led housing companies and the GLA funded housing zone within Poplar Riverside) and other interventions (e.g. brownfield register) which will accelerate the supply of new homes over the plan period.

- 3.4.51 If monitoring suggests targets are not being met, the Local Plan sets out a commitment to undertake a review of the plan to explore ways of addressing this unmet need, taking into account the outcomes of future iterations of the London Plan.
- 3.4.52 No suggestions for changes to policies in this section have been identified.

Delivering Economic Growth

- 3.4.53 This chapter of the Draft Local Plan contains a set of policies relating the need for development to secure employment provision, the location of new employment development and protection of existing sites. S.EMP1 'Creating investment and jobs' identifies employment locations and the preferred uses. Other policies are:
- ▶ Policy D.EMP2 'New employment space';
 - ▶ Policy D.EMP3 'Loss of employment space'; and
 - ▶ Policy D.EMP4 'Redevelopment within the borough's employment areas'.

Consideration of Options

- 3.4.54 The Council identified options in relation to the Protection of Preferred Office Locations and the marketing of vacant sites (both options relate to Policy D.EMP4) at the Regulation 18 stage.

Protection of Preferred Office Locations (POLs) from housing development

- 3.4.55 The Council considered two options relating to POLs:
- ▶ Option 1: To retain existing prohibition of housing within Preferred Office Locations (POLs); and
 - ▶ Option 2: To allow housing within POLs.
- 3.4.56 The findings of the appraisal contained at **Appendix K** suggests that Option 1 would make a contribution to a range of SA objectives including: 1 'Equality', 2 'Liveability', 3 'Health and Well-being', 4 'Housing', 5 'Transport', 6 'Education', 7 'Employment', 8 'Economic Growth', 9 'Town Centre' and 14 'Natural Resources'. It will do this by helping to retain opportunities for employment in accessible locations. Positive outcomes were also identified for Option 2, although the results of the appraisal indicate uncertainties around the resulting mix of uses.
- 3.4.57 The Council chose Option 1 (see **Appendix J** for reasoning).

The period over which vacant employment premises must be marketed for

- 3.4.58 The Council considered two options:
- ▶ Option 1: To maintain the existing 12-month period for evidence of marketing for loss of employment space; and
 - ▶ Option 2: To extend 12-month period of evidence to 24 months.
- 3.4.59 In SA terms, there is little to choose between these options, reflecting the strategic nature of the assessment (see **Appendix K**). Both options could contribute to SA objective 7 'Employment' and related objectives, e.g. 3 'Health' and 1 'Equality', by encouraging the retention of sites for employment use.
- 3.4.60 The requirement for sites to be marketed for 24 months could delay a site coming forward for development for an alternative, beneficial use. However, the Employment Land Review indicates that a period of 24 months is justifiable to ensure that sites are retained in employment use so these different considerations need to be balanced accordingly.
- 3.4.61 The Council chose Option 2 (see **Appendix J** for reasoning).

Appraisal of Policies

- 3.4.62 The GLA has identified a target of creating 125,000 new jobs over the period to 2031 which the Borough is committed to meet (Policy S.EMP1 refers). The Local Plan identifies a shortfall, in terms of the office and industrial floorspace required to meet the target (Table 4 of the Local Plan refers). The Policies are however judged to make a significant positive contribution to this objective because they provide the policy context for encouraging employment development. The Local Plan also indicates that while the GLA projection cannot be met from identified sites in the development pipeline, the Borough Council is confident that capacity exists to make up the shortfalls. For both office and industrial uses there are opportunities within designated employment locations to add a significant quantum of floorspace through the intensification of existing provision. For offices there are numerous opportunities for new floorspace to be delivered through 'windfall' sites, generally through mixed-use developments across the borough and in the site allocations.
- 3.4.63 A significant positive effect is still anticipated in relation to SA objective 1 'Equality' given the anticipated scale of employment to be created in the Borough, over the plan period.
- 3.4.64 Significant positive effects are also anticipated in relation to SA objective 5 'Transport' as policies seek to concentrate new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts and increase the efficiency of freight transport.
- 3.4.65 All policies make a significant positive contribution to SA objective 7 'Employment' and SA objective 8 'Economic Growth'. The policies encourage the development of employment floorspace and identify designated employment areas where specific types of employment uses should be directed to, whilst seeking to prevent the loss of employment space within designated areas and to ensure that new employment developments are compatible with existing and surrounding uses. As such all of these policies support the overall delivery of new employment opportunities, however they do not explicitly address issues regarding worklessness or barriers to employment within the local population, although the need to do this is identified in Policy S.SG2, which supports development that provides local training or employment opportunities in either, or both, the construction phase and end use.
- 3.4.66 Policy S.EMP1 has a significant positive effect in relation to SA objective 7 'Climate Change' by concentrating new employment and light industrial uses within highly accessible designated areas, which would support sustainable modal shifts and contribute to climate change mitigation.
- 3.4.67 No suggestions for mitigation or enhancement arose from the assessment.
- 3.4.68 To avoid potential conflict with Town Centre policies within the Local Plan it was suggested that Spatial Policy S.EMP1 should clarify the relationship between appropriate land uses, where designated employment and/or industrial areas and defined Town Centres overlap. The Council has indicated that the policies as drafted are considered to provide sufficient clarity and in reviewing the content of Policy S.TC1, this conclusion is concurred with.

Revitalising our Town Centres

- 3.4.69 This chapter of the Draft Local Plan contains a set of policies relating to the hierarchy of town centres in the Borough and uses within town centres.
- 3.4.70 Spatial Policy S.TC1 sets out the Town Centre hierarchy.
- 3.4.71 Other policies are:
- ▶ D.TC2 'Retail in our town centres';
 - ▶ D.TC3 'Retail outside our town centres';
 - ▶ D.TC4 'Financial and professional services';
 - ▶ D.TC5 'Food, drink, entertainment and the night-time economy';
 - ▶ D.TC6 'Short-stay accommodation'; and

▶ D.TC7 'Markets'.

Consideration of Options

- 3.4.72 Options were identified at the Regulation 18 stage in relation to the designation of town centres (S.TC1), mix of retail and non-retail in centres (S.TC1) and the period over which vacant retail premises must be marketed for (D.TC3).

Town centres

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

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

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

- 3.4.75 The Council chose Option 2 (see **Appendix J** for reasoning).

The mix of retail and non-retail units in centres

- 3.4.76 These options related to the appropriate percentage of retail (A1) units within primary and secondary frontages and three options were considered:

- ▶ Option 1. 70/30;
- ▶ Option 2: 60/40; and
- ▶ Option 3: No minimum within secondary frontages.

- 3.4.77 In SA terms (see **Appendix K** for details), there is little to differentiate between options 1 and 2 when considered against the SA objectives and both were scored similarly, with positive outcomes for a range of objectives, including 1 'Equality', 2 'Liveability', 3 'Health', 4 'Housing' and 5 'Transport'. The potential for some minor negative effects associated with Option 3 was identified because this option could result in a greater prevalence of hot food takeaways, betting shops and pay-day loan shops in secondary frontages, although this is uncertain and would depend on the range of uses that were attracted to any particular area.

- 3.4.78 The Council chose Option 2 (see **Appendix J** for reasoning).

The period over which vacant retail premises must be marketed for

- 3.4.79 The Council considered two options:

- ▶ Option 1: Maintain the existing 12-month period for evidence where loss of A1 retail is proposed;
- ▶ Option 2: Extend period to 18 or 24 months.

- 3.4.80 In SA terms, there is nothing to significantly differentiate between these options. Both options seek to safeguard existing retail provision and in so doing would contribute towards a number of SA objectives that relate to the ability to access retail facilities in sustainable locations (see **Appendix K** for details). These include SA objectives 1 'Equality', 2 'Liveability', 3 'Health', 4 'Housing' and 5

'Transport'. There is a need to balance considerations around protecting sites for retail use and the merits of an alternative use so these different considerations need to be balanced accordingly.

3.4.81 The Council chose Option 1 (see **Appendix J** for reasoning).

Appraisal of Policies

- 3.4.82 Significant positive effects are identified for SA objective 1 'Equality'. Policy S.TC1 supports community uses within District Centres, this includes temporary use where this helps to activate and revitalise vacant town centre units and sites. This would concentrate such uses in accessible locations, which would indirectly help to reduce social exclusion and therefore contribute to this SA objective. Policies D.TC2, D.TC3 and D.TC7 will also contribute to this objective by ensuring access to town centre related activities and healthy food, in the case of D.TC7. A significant positive effect is anticipated for D.TC2 and D.TC3 and a minor positive effect for D.TC7.
- 3.4.83 For SA objective 3 'Health' - Policies D.TC4 and D.TC5 set out criteria to restrict certain land uses within the Town Centre hierarchy in the interests of amenity, health protection and social wellbeing. This would reduce the proliferation of uses with negative health externalities, resulting in a major positive effect on this SA objective. Policy D.TC7 makes a minor positive contribution by providing an opportunity to access healthy food.
- 3.4.84 All policies seek to concentrate main town centre uses within highly accessible Town Centres and other centres, as identified in the hierarchy in Policy S.TC1. This would link new high footfall development with sustainable transport provision and therefore support sustainable modal shifts, resulting in a direct major positive effect on SA objective 5 'Transport'.
- 3.4.85 A significant positive contribution to SA objective 6 'Education' is anticipated as Policy S.TC1 supports new community uses within District Centres. This would allow education facilities to be developed in highly accessible locations, resulting in improved opportunities to access education and learning.
- 3.4.86 All policies make a significant positive contribution to economic growth SA Objective 8 'Economic Growth' and SA Objective 9 on Town Centres.
- 3.4.87 Previous suggestions have been addressed by the Council and relate to the justification for solid shutters not being permitted (D.DH9 'Shopfronts'), adding a reference to the Council's Licensing Policy (which is now referenced in the supporting text to D.TC5). Comments on the Regulation 18 Local Plan included referencing the Mayor's SPG on Town Centres (which is now referenced in the evidence links for the chapter).

Supporting Community Facilities

- 3.4.88 This chapter of the Draft Local Plan contains four policies that aim to deliver and protect essential community infrastructure. Policy S.CF1 'Supporting community facilities' sets out the role of development in relation to such infrastructure and cross references other policies that relate to the location of such facilities. The other policies are:
- ▶ D.CF2 'Existing community facilities';
 - ▶ D.CF3 'New and enhanced community facilities'; and
 - ▶ D.CF4 'Public houses'.

Consideration of Options

- 3.4.89 No options were identified in relation to this topic.

Appraisal of Policies

- 3.4.90 Policy S.CF1 requires development proposals to protect existing community facilities and contribute positively to the capacity, quality, usability and accessibility of existing facilities. This

would directly contribute to SA Objective 1 'Equality' through increasing opportunities to reduce social exclusion and promote integration through community based activities.

- 3.4.91 All policies are assessed as having a significant positive effect in relation to SA objective 2 'Liveability.' Policies set out criteria to protect existing services and facilities and to support new provision in accessible and appropriate locations. Policy D.CF2 stipulates that where it can be robustly demonstrated that there is no longer a need for the specific facility, the site should be used for another community use, unless no longer needed.
- 3.4.92 In relation to health and wellbeing, Policy S.CF1 requires development proposals to protect existing facilities and improve them and to deliver new facilities in appropriate locations. This would directly contribute to SA objective 3 'Health and wellbeing' and a significant positive effect is therefore identified. Policy D.CF2 sets out criteria to safeguard existing community facilities (including health facilities), which will also directly contribute to this objective. Policy D.CF3, meanwhile, directs proposals for new health infrastructure/facilities to accessible locations, which would ensure that enhanced infrastructure provision can increase access to healthcare services. As such this policy would directly contribute to this SA objective by addressing issues of wide and equitable access to health care facilities.
- 3.4.93 There is potential for these policies to work in synergy with the housing policies to contribute towards the liveability aspects of SA objective 4 on housing, resulting in a significant positive effect.
- 3.4.94 Policy S.CF1 and Policy D.CF3 direct proposals for new facilities and services to accessible locations including Town Centres and areas in accessible locations. As such, the policies would link new community facility development with sustainable transport provision and could encourage sustainable modal shifts when accessing these facilities and services, resulting in a significant positive effect on SA objective 5 'Transport'.
- 3.4.95 In relation to SA objective 6 'Education', Spatial Policy SPCF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, community facilities. This would directly contribute to this SA objective through enhancing education opportunities and facilities and supporting the Council in continuing to discharge their statutory education duties. Policy D.CF2 includes criteria for the extension of existing schools. Policy D.CF3 provides support for the delivery of an expanded network of pre-school, school, further and higher education facilities and upgraded Idea Stores. This would directly contribute to this SA objective through enhancing a range of education opportunities and facilities, which could also increase opportunities for adult learners to retrain or upskill.
- 3.4.96 Spatial Policy S.CF1 and Policy D.CF3 direct community facilities to locations within the Town Centre hierarchy. This would enhance the vitality of Town Centres and therefore directly contribute to SA Objective 9 'Town Centres' (a significant positive effect). Providing facilities in sustainable locations will also encourage sustainable modal shift and thus make a significant positive contribution to SA Objective 12 'Climate Change'.
- 3.4.97 A previous suggestion was that reference could be made to the potential for community facilities to be provided through shared facilities where this is appropriate. This is now referenced in Policy S.CF1.
- 3.4.98 Earlier work on the emerging plan suggested that Policy S.CF1 could be positively worded, in order to comply with the NPPF and this has been addressed.

Enhancing Open Spaces and Water Spaces

- 3.4.99 This chapter of the Draft Local Plan contains a set of policies relating to the creation of new open and water space and the protection of existing open and water spaces. Policies in relation to water also seek to enhance water spaces and the blue-ribbon network.
- 3.4.100 The Draft Local Plan identifies a need for 220ha of open space by 2031, equivalent to the delivery of 2 to 3 spaces the size of Victoria Park. Policy S.OWS1 'Creating a network of open spaces' sets out the measures to protect, create, enhance and connect open spaces and address open space deficiency. The other policies are:

- ▶ S.OWS2 'Enhancing the network of water spaces';
- ▶ D.OWS3 'Open space and green grid'; and
- ▶ D.OWS4 'Water spaces'.

Consideration of Options

3.4.101 No options were identified in relation to this topic.

Appraisal of Policies

- 3.4.102 All policies are anticipated to have a significant positive effect on SA objectives 1 'Equality', 2 'Liveability', 3 'Health' and 4 'Housing'. They will provide the opportunities for recreational activity and safeguard the amenity and existing use of open spaces and water spaces thereby helping to create liveable neighbourhoods. Policy D.OWS.4 also includes a criterion relating to residential moorings.
- 3.4.103 A network of accessible and connected local green spaces and water spaces will also make a significant positive contribution to SA objective 5 on 'Transport and mobility'. All policies are judged to make a significant positive contribution to this objective.
- 3.4.104 Protecting and enhancing existing open spaces could also help conserve and enhance townscape, with all policies making a significant positive contribution to SA Objective 10 'Design and Heritage,' for example Policy D.OWS3 states that development should not adversely impact on the public enjoyment, openness, ecological and heritage value of the borough's publicly accessible open spaces. All policies also make a significant positive contribution to SA objective 11 'Open Space'.
- 3.4.105 Policy D.OWS4 makes a significant positive contribution to SA Objective 12 relating to climate change by requiring development to be set back from fluvial waters helping to mitigate flood risk.
- 3.4.106 All policies make a significant positive contribution to SA objective 13 'Biodiversity' by seeking the protection and enhancement of open spaces, water spaces and green corridors. For example, Policies D.OWS3 and D.OWS4 specifically require development proposals not to adversely impact on the biodiversity value of open and water spaces.
- 3.4.107 In relation to SA objective 14 'Contaminated land' the protection, development and enhancement of open spaces required by Policy S.OWS1 and Policy D.OWS3 would help to improve soil quality, whilst the support provided in Policy D.OWS3 for temporary greening would improve the appearance and longer term development potential of vacant and brownfield sites.
- 3.4.108 No suggestions for changes to the policies in this section have been identified.

Protecting and Managing our Environment

- 3.4.109 This chapter of the Draft Local Plan contains a set of policies relating to natural resources and the natural environment and specific environmental topics.
- 3.4.110 Policy S.ES1 'Protecting and enhancing our environment' sets out principles for reducing the use of natural resources and enhancement of the natural environment. The other policies are:
- ▶ D.ES2 'Air quality';
 - ▶ D.ES3 'Urban greening and biodiversity';
 - ▶ D.ES4 'Flood risk';
 - ▶ D.ES5 'Sustainable drainage';
 - ▶ D.ES6 'Sustainable water management';
 - ▶ D.ES7 'A zero carbon borough';

- ▶ D.ES8 ‘Contaminated land and storage of hazardous substances’;
- ▶ D.ES9 ‘Noise and vibration’; and
- ▶ D.ES10 ‘Overheating.’

Consideration of Options

- 3.4.111 Options were identified in relation to a zero carbon borough at Regulation 18 stage (D.ES7).
- 3.4.112 The Council identified two options in respect of reducing carbon emissions:
- ▶ Option 1: Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 45% reduction on-site. (Current Local Plan Policy); and
 - ▶ Option 2: Require residential and non-residential development (by 2016 and 2019 respectively) to achieve zero carbon with a minimum 35% reduction on-site. (Current London Plan Policy).
- 3.4.113 Both options would contribute to zero carbon development with different emphasis on the reduction achieved on sites. As such, both options would contribute to a range of SA objectives (see **Appendix K** for details). In particular, both options could help address issues around fuel poverty contributing to SA objective 1 ‘Equality’ and objective 3 ‘Health’. There are also benefits associated with the provision of good quality energy efficient housing, a contribution to climate change mitigation (SA objective 12 ‘Climate Change’) and natural resources (SA objective 14). Option 1 contributes more effectively to the overall carbon target than a 35% carbon reduction policy requirement (Option 2).⁷
- 3.4.114 The Council chose Option 1 (see **Appendix J** for reasoning).

Appraisal of Policies

- 3.4.115 Significant positive effects are anticipated in relation to SA objective 1 ‘Equality’. Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance the natural environment, and Policy S.ES1 specifically identifies the need to improve opportunities to experience nature, in particular in biodiversity deficient areas. This could prioritise environmental improvements in deprived areas (or areas lacking open spaces) and increase access to environmental assets (e.g. open spaces) for a range of demographic groups, which would help to tackle social exclusion and promote social cohesion and integration. As such both policies make a significant positive contribution to this SA objective.
- 3.4.116 Significant positive effects are also anticipated for SA objective 2 ‘Liveability’ and 3 ‘Health’. Policy S.ES1 identifies the need through biodiversity protection and enhancement to improve opportunities to experience nature, in particular in deficient areas, which could be beneficial to mental and physical health. It also identifies the need to mitigate the adverse effects of contaminated land on human health. Policy D.ES2 seeks to secure air quality neutral development, contributing to a high quality public realm and reducing the impacts of pollution on the public realm, making a significant positive contribution to both SA objectives. Other policies also make a significant contribution to health, including those relating to urban greening (D.ES3) and contaminated land (D.ES8).
- 3.4.117 Requiring development to achieve air quality neutral development will help achieve SA objective 5 ‘Transport and mobility’ by encouraging modal shift and Policy S.ES1 and Policy D.ES2 are judged to make a significant positive contribution to this objective on this basis.
- 3.4.118 Policies D.ES9 and D.ES10 seek to avoid noise pollution and overheating. They will help achieve SA objective 9 ‘Town Centres’ by encouraging an attractive built environment that will help maintain the vitality of town centres.

⁷ London Borough of Tower Hamlets Carbon Policy Evidence Base, Etude, October 2016.

- 3.4.119 Policy S.ES1 and Policy D.ES3 are judged to make a significant contribution to SA objective 11 'Open Space' as both will contribute to the provision of good quality open spaces.
- 3.4.120 All policies are assessed as having a significant positive effect in relating to SA objective 12 'Climate change mitigation and adaptation'. Policies directly contribute to this SA objective through encouraging sustainable design, construction and use of new developments to reduce greenhouse gas emissions and adapt to climate change. In particular, the policies seek to maximise energy efficiency, promote onsite energy generation from renewable energy sources, enable district heating, minimise waste generation, reduce water consumption and reduce flood risks, which is likely to increase resilience and reduce vulnerability to climate change impacts.
- 3.4.121 Positive effects are anticipated in relation to SA objective 13 'Biodiversity'. Policy S.ES1 and Policy D.ES3 require all developments to protect and enhance biodiversity, and in doing so Policy S.ES1 requires developments to increase access to nature and to contribute to meeting the objectives of the latest Tower Hamlets Biodiversity Action Plan and the Thames River Basin Management Plan. The policies would ensure that development proposals protect, conserve and enhance a variety of habitats, designated sites, and protected species, and could also indirectly encourage greater habitat connectivity, resulting in major positive effects on this SA objective.
- 3.4.122 All policies are assessed as making a significant positive contribution to SA objective 14 on natural resource use. For example, Policy S.ES1 and Policies D.ES4 and D.ES5 set out a pro-active approach to flood risk management, which would ensure that development proposals contribute to sustainable drainage practices and the protection of water quality. Policy D.ES8, meanwhile, protects soil resources.
- 3.4.123 The Strategic Flood Risk Assessment (SFRA) (2016) identifies that parts of the Borough are at potential risk of flooding. Whilst the Thames Barrier and other flood defences currently provide effective protection, their maintenance, along with further investment in flood defences, is required in order to maintain this protection. Climate change will also have an impact on flood risk and must be considered in order to mitigate the risk of flood for the expected lifetime of a development. The Borough also has a number of critical drainage areas, which are at higher risk of surface water flooding. Significant positive effects are anticipated for SA objective 15 'Flood Risk'. Policy S.ES1 and Policies DES4 and D.ES5 set out a pro-active approach to flood risk management, which directs development away from flood risk areas and therefore minimises flood risks to people and property. Policy D.ES5 also sets out criteria to ensure surface run-off rate and volume is kept within acceptable limits and encourages the use of SUDS. As such these policies directly contribute to this SA objective through requiring flood risk and drainage to be managed sustainably.
- 3.4.124 Significant positive effects are anticipated for SA objective 16 'Contaminated Land' as Policy D.ES8 sets out criteria to control development on potentially contaminated or unstable land subject in order to safeguard environmental and amenity interests. This provides a framework to allow the appropriate redevelopment of brownfield land whilst reducing human health impacts arising from existing contaminated land.
- 3.4.125 No suggestions for changes to policies in this section have been identified.

Managing our Waste

- 3.4.126 This chapter contains the following policies:
- ▶ Policy S.MW1 'Managing our waste';
 - ▶ Policy D.MW2 'New and enhanced waste facilities';
 - ▶ Policy D.MW3 'Waste collection facilities in new development;'
- 3.4.127 Options were identified at Regulation 18 stage in relation to safeguarding waste sites and these are discussed below.

Safeguarding Waste Sites

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

Appraisal of Policies

- 3.4.132 D.MW2 includes criteria to protect the amenity of existing uses where new waste facilities are proposed and a significant positive effect is identified in relation to SA objective 2 'Liveability.'
- 3.4.133 These policies directly contribute to SA objective 12 'Climate change' by encouraging measures to minimise carbon emissions and maximise the use of lower carbon energy sources, the minimisation of waste generation, enabling waste segregation and recycling. A significant positive effect is anticipated.
- 3.4.134 Policies S.MW1, D.MW2 and D.MW3 set out a strategy and development management criteria to provide waste management facilities, minimise residual waste generation from new developments and manage it thereby encouraging the growth of the circular economy. The policies are therefore judged to make a significant positive contribution to SA objectives 14 'Natural resources.'
- 3.4.135 Policy S.MW1 identifies safeguarded sites and areas of search for new ones. Safeguarded sites are already in use so their continued use will not give rise to significant environmental effects when compared to the baseline. Given the nature of the location of the areas of search, e.g. Strategic Industrial Locations or strategic sites it is considered that the potential effects associated with the use of these sites has been considered in the appraisal of the policy and other policies in the Local Plan, e.g. S.EMP1.
- 3.4.136 No suggestions for changes to policies in this section have been identified.

Improving Connectivity and Travel Choice

- 3.4.137 This chapter of the Draft Local Plan contains a set of policies relating to transport and connectivity, the policies set out the framework for future investment and the requirements for future development.
- 3.4.138 The section includes the following policies:
- ▶ S. TR1 'Sustainable travel';
 - ▶ D.TR2 'Impacts on the transport network';
 - ▶ D.TR3 'Parking and permit – free'; and
 - ▶ D.TR4 'Sustainable delivery and servicing'.

Consideration of Options

- 3.4.139 Options in relation to car parking and cycling standards (D.TR3) were identified.
- 3.4.140 The Council identified the following options in relation to car parking standards:
- ▶ Option 1: Increase to London Plan standards;
 - ▶ Option 2: Maintain current MDD standards (lower than London Plan); and
 - ▶ Option 3: Reduce standards.
- 3.4.141 The following standards were identified in relation to cycle parking:
- ▶ Option 1: London Plan standards; and
 - ▶ Option 2. Maintain current MDD standards.
- 3.4.142 Increasing car parking (Option 1) could impact on factors like health and air quality but this would depend on the significance of the shift between current and revised standards and the increase in vehicles this would give rise to (see **Appendix K** for details). Proposals would still have to demonstrate air quality neutrality under Option 1. All options would contribute to SA objectives 1 'Equality', 4 'Housing', 5 'Transport', 8 'Economic Growth' and 9 'Town Centres'. Both options relating to cycle parking would additionally contribute to SA Objective 3 'Health'.
- 3.4.143 The Council chose Option 3 for car parking and Option 2 for cycle parking (see **Appendix J** for details).

Appraisal of Policies

- 3.4.144 S. TR1 directs high trip generating development proposals to the town centre hierarchy and locations with high levels of public transport accessibility, which would indirectly help to reduce social exclusion and therefore contribute to SA objective 1 'Equality'.
- 3.4.145 All the policies in this section require development proposals to safeguard, develop and enhance the Borough's transport network, in particular the public transport system, and as Policy S.TR1 directs high trip generating developments to highly accessible locations. The policies would therefore make a significant positive contribution to SA objectives 3 'Liveability', 5 'Transport' and 8 'Economic growth' through enhancing access, in particular by public transport, to services, facilities and amenities, and through providing adequate transport infrastructure, as well as indirectly catalysing improvements to public realm around transport improvement projects.
- 3.4.146 Policy S.TR1 makes a significant positive contribution to SA objective 3 'Health' by encouraging walking and cycling and directing high trip generating developments to highly accessible locations. Directing health, leisure and community facilities to highly accessible locations that will be accessible by public transport will improve accessibility to such facilities, enabling their use and thereby contributing to this objective.
- 3.4.147 Policy D.TR3 requires new developments to include adequate cycle parking provision and to contribute towards cycle docking stations. This would increase cycling within the Borough, resulting in improved physical health through exercise and a direct significant positive effect on this SA objective.
- 3.4.148 All policies in this section make a significant positive contribution to SA Objective 12 'Climate Change' as they set out criteria to safeguard, development and enhance the public transport system. In particular, Policy S.TR1 commits to transport improvements, directs high trip generating developments to highly accessible locations and requires development proposals to be integrated with the public transport network, which would increase capacity and encourage sustainable modal shifts. All other Transport and Connectivity policies would similarly enhance the functioning of the Borough's public transport system and either directly or indirectly would concentrate development in accessible locations and encourage sustainable modal shifts.

- 3.4.149 In relation to SA objective 14 'Natural Resources', Policy D.TR2 sets out measures to address potential increases in congestion arising from development proposals, which could otherwise increase local air pollution, cause/exacerbate health problems and impact on safety. Throughout these policies the priority afforded to public transport would encourage sustainable modal shifts which could improve air quality from traffic reduction, and air quality could also be improved through mitigation measures provided by the Council and developers of specific projects.
- 3.4.150 Previous recommendation in relation to this topic have largely been addressed. It was recommended that more detail on how the requirements of D.TR2 relating to public transport accessibility and capacity would be assessed and the supporting text of the Draft Local Plan now addresses this point. It was also suggested that the Draft Local Plan could reference the Council's Cycling Plan and Walking Plan. The latest Cycling Plan (2017) is referenced in the evidence for the chapter. The Council has indicated that the Walking Plan is out of date and it has not therefore been referenced.

Policy Gaps

- 3.4.151 Rather than just assess what is contained in the Draft Local Plan, the IIA team undertook an exercise to test the extent to which the SA objectives are covered by policies in the Plan and to see whether or not this identified any gaps in policy. Note as part of this exercise, no judgement is made about the extent to which a policy is compatible with one or more objective; any such issues have been flagged through the detailed assessment of policies outlined above. This exercise was first undertaken on the Regulation 18 Draft Local Plan and has been updated to accompany the Regulation 19 version. The results are summarised in **Table 3.3** below. On the basis of this analysis, no policy omissions have been identified.

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

SA Objective	Relevant policies
1. Equality: Reduce poverty and social exclusion and promote equality for all communities	A range of policies relating to housing (S. H1, Policies D.H2 and D. H4), employment (S. EMP1 and D.EMP2), community infrastructure (S.CF1 and Policies D.CF2-3) and transport (S.TR1) will contribute towards this objective.
2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services	A range of policies relating to housing, town centres, community facilities and transport will contribute towards this objective.
3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities	A number of policies will contribute towards this objective, e.g. S.SG2, D.SG3, D.SG4, D.ES3, D.TC4, D.TC5, D.ES2 in relation to air quality and D.ES9 in relation to noise pollution and vibration.
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability	Policy S.H1 and Policies D.H2 to D.H7 contribute to this objective.
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	Policy S.TR1 and Policies D.TR2 to 4 contribute to this objective.
6. Education: Increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.	Policies S.SG1, S.CF1, D.CF2 and D.CF3 will contribute towards the achievement of this objective.
7. Employment: Reduce worklessness and increase employment opportunities for all residents	Policy S.EMP1 and policies D.EMP2 to 4. Policies relating to improved public transport could also assist in terms of improving access to employment.

SA Objective	Relevant policies
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	Policy S.EMP1 and Policies D.EMP2 to 4.
9. Town Centres: Promote diverse and economically thriving town centres.	Policy S.TC1 and Policies D.TC2 to 7.
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	Policies S.DH1 and D.DH2 and Policies D.DH3 to D.DH11.
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	S.OWS1 and D.OWS3 contribute to this objective.
12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.	Policy D.ES4 relates to flood risk and D.ES5 relates to SuDS. Other policies relating to climate change adaptation include Policy D.ES6 on sustainable water management. Policy D.ES7 relates to climate change mitigation in terms of energy consumption in the built environment but a range of policies also seek to mitigate the contribution of the transport sector, including S.SG1 and S.TR1.
13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.	Policy S.DH1 requires development to incorporate features of positive biodiversity value, where possible. Policies S.ES1, D.ES3 and S.OWS2 require development proposals to protect and enhance biodiversity. Open space policies and design policies will contribute to the landscape element of the objective.
14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.	Policy D.ES6 relates to water, Policy D.ES8 relates to contaminated land, Policy D.ES2 relates to air quality and Policies S.MW1, D.MW2 and D.MW3 relate to waste management facilities.
15. Flood risk reduction and management: To minimise and manage the risk of flooding	Policies D.ES4 and D.ES5 relate to flood risk.
16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.	Policy D.ES8 relates to contaminated land.

Delivering Sustainable Places

- 3.4.152 Part 4 of the Regulation 19 Draft Local Plan sets out detailed guidance for the 4 sub-areas identified in the Local Plan and 21 site allocations. For each sub-area the Local Plan includes an indication of its development potential, a vision, measures to achieve the vision and a set of Development Principles covering design and the historic environment, housing, town centres and employment, environment and transport and connectivity.
- 3.4.153 The site allocations proposed within each sub-area are then presented. The land use, infrastructure, design principles and delivery considerations for each site then follow.
- 3.4.154 This part of the report comments on the Development Principles for each sub-area and then appraises the strategic sites that are included in the Regulation 19 Draft Local Plan, having regard to the design principles for the site.
- 3.4.155 Twenty eight strategic sites were included as proposed allocations within the Regulation 18 Draft Local Plan (see **Figure 3.1**). Many are major sites identified in the Managing Development Document (April 2013).

3.4.156

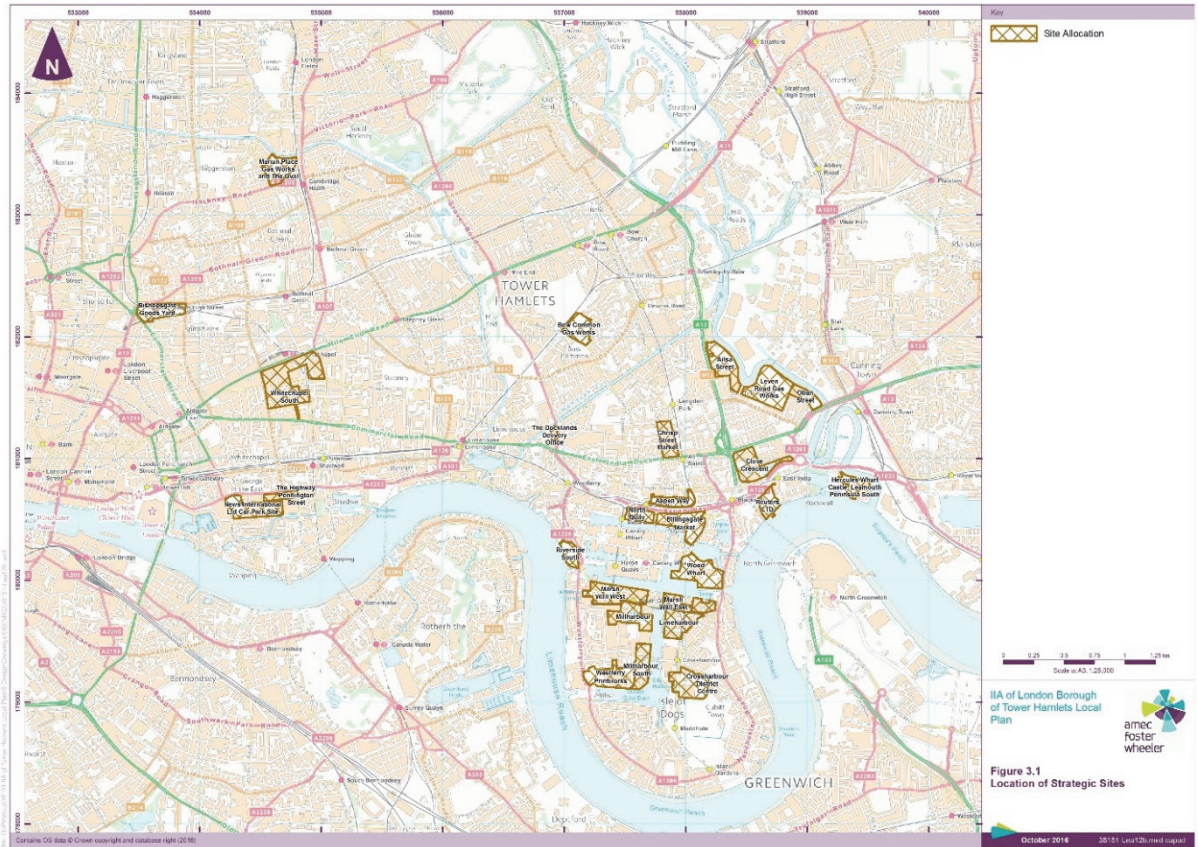
The Council has not included all of these sites in the Regulation 19 Draft Local Plan. The sites that have not been included and the reasons for this are set out in **Table 3.4**. It is still anticipated that the sites that have not been included in the Local Plan will come forward for development in the form outlined in **Table 3.4** below. The sites that are allocated in the Local Plan are included on the basis that they will deliver key infrastructure (as specified for each site in the Local Plan). The sites that are omitted are not considered to be able or suitable for the delivery of key infrastructure, therefore it is not necessary for this report to treat the sites that are not included in the Local Plan as reasonable alternatives to those that are included.

Table 3.4: Reasons for Not Including Sites as Strategic Sites in the Local Plan

Site Name	Reason for Not Including in the Local Plan as a Strategic Site
The Highway	<p>The site is not suitable for the following reasons:</p> <ul style="list-style-type: none"> The site does not fall within an area of open space deficiency and no longer meets the criteria to be shortlisted. Evidence updated as part of the Open Space Strategy. <p>The site is not available for the following reasons:</p> <ul style="list-style-type: none"> The site can potentially accommodate approximately 500 new homes, with ground floor commercial uses fronting the Highway. However, the site is fragmented and in multiple land ownership, which will significantly affect the deliverability of 0.4 hectares of consolidated open space. This infrastructure requirement will be challenging to achieve if sites come forward in a piecemeal manner.
Clove Crescent	<p>The site is not suitable for the following reasons:</p> <ul style="list-style-type: none"> The site falls within a Local Employment Location, which requires the reprovion of employment floorspace as part of redevelopment. The site has a significant amount of existing employment floorspace and its reprovion would be in the form of an employment-led redevelopment. The amount of developable land to support the reprovion of existing employment floorspace, together with 500 new homes and a primary school is not sufficient to support this level of development. <p>The site is not available for the following reasons:</p> <ul style="list-style-type: none"> The site is subject to redevelopment plans to intensify employment use on the site. Construction works are underway to implement the proposal to facilitate this. This significantly affects likely prospects for this site coming forward comprehensively in the plan period. <p>The site is not achievable for the following reasons:</p> <ul style="list-style-type: none"> Given the need to reprovion existing employment floorspace in line with policy, there is insufficient land to deliver 500 units or more alongside infrastructure. Initial viability scoping concluded the site to be unviable with the reprovion of existing floorspace, 200 new homes and a primary school. Increasing the amount of new homes on site and reduction in affordable housing provision may increase viability prospects, but will not be policy compliant.
Oban Street	<p>The site is not suitable for the following reasons:</p> <ul style="list-style-type: none"> The site provides the size and type of good quality medium sized well maintained industrial units that are in short supply in the Borough and has been safeguarded as a Local Industrial Location (LIL) (Reference Blackwall Trading Estate) in the Employment Land Review (ELR). The LIL requires the reprovion of industrial floorspace as part of redevelopment. The site has a significant amount of industrial floorspace and its reprovion would be in the form of an employment-led redevelopment. The amount of developable land to support the reprovion of existing employment floorspace, together with 500 new homes and an open space is not sufficient to support this level of development. <p>The site is not available for the following reasons:</p> <ul style="list-style-type: none"> Initial scoping has identified the site suitable for potential safeguarding and allocating as a waste use by reason of the LIL designation, current on site uses and proximity to the A13. Further evidence base work is underway to finalise this position in policy. <p>The site is not achievable for the following reasons:</p> <ul style="list-style-type: none"> Initial viability scoping concluded the site to be unviable with the reprovion of existing industrial floorspace, 400 new homes and open space. Increasing the amount of new homes on site and reduction in affordable housing provision may increase viability prospects, but will not be policy compliant.
Docklands Delivery Office	<p>The site is not available for the following reasons:</p> <ul style="list-style-type: none"> The site is subject to redevelopment plans to provide new homes and commercial uses. The scope to influence development proposals are limited by the timing of an imminent planning application. <p>The site is not achievable for the following reasons:</p> <ul style="list-style-type: none"> The site has the potential to accommodate 150 homes with ground floor commercial uses. Initial viability scoping concluded the site to be unviable with the provision of 150 new homes and 0.4 of open space. Increasing the amount of new homes on site and reduction in affordable housing provision may increase viability prospects, but will not be policy compliant.
Hercules Wharf	<p>The site is not available for the following reasons:</p> <ul style="list-style-type: none"> The site is subject to redevelopment plans to provide 834 new homes, retail, employment and education uses. The existing planning permission PA/14/03594 employment use on the site. The

Site Name	Reason for Not Including in the Local Plan as a Strategic Site
	proposal will not deliver significant infrastructure to justify its allocation. Construction works are underway to implement the proposal to facilitate this.

Figure 3.1 All Sites Previously Considered As Strategic Sites



3.4.157 Two strategic sites were already under construction when work on the IIA commenced and therefore were not appraised, as they form part of the baseline scenario:

- ▶ London Dock; and
- ▶ Wood Wharf.

Appraising the Development Principles for the sub-areas

3.4.158 The Development Principles for the sub-areas have been appraised and the matrices are at **Appendix L**. It is acknowledged that there is some potential for the appraisal to replicate some of the beneficial effects associated with other elements of the Local Plan and the London Plan, for example in relation to the delivery of new infrastructure but the Development Principles provide the locality specific link between the London Plan (which identifies the Opportunity Areas), Policy S.SG1 of the Draft Local Plan (which confirms the spatial strategy for the borough) and the strategic sites in the Local Plan that fall within each of the sub-areas.

3.4.159 Significant positive effects are identified in relation to SA objective 2 'Liveability' in those instances where the Development Principles identify strategic infrastructure that will improve accessibility to facilities and services within the sub-areas.

3.4.160 Significant positive effects are identified against SA objective 4 'Housing' as all of the sub areas will deliver significant amounts of housing over the plan period.

- 3.4.161 Significant positive effects are identified in relation to SA objective 5 'Transport,' e.g. in the Lower Lea Valley and Isle of Dogs and South Poplar as the Development Principles identify strategic transport infrastructure.
- 3.4.162 The City Fringe Development Principles identify the need to contribute to a globally significant research cluster. A significant positive benefit in relation to SA objective 6 'Education' is identified on this basis. The Development Principles for the Lower Lea Valley include the need to support the expansion of fashion manufacturing, training, technology and incubator workspaces which will contribute to this objective and a significant positive effect on SA objective 6 is identified on this basis.
- 3.4.163 The City Fringe Development Principles identify the need for development to contribute to the Tech City and Med City Vision, for a globally significant research cluster, including the provision of a range of flexible work spaces for SMEs and start-ups and retail/ leisure spaces. The Lower Lea Valley and Isle of Dogs and South Poplar sub-area Development Principles also include significant proposals for employment. A significant positive effect is identified for these three sub-areas in relation to SA objective 8 'Economic Growth.'
- 3.4.164 The Development Principles for the Isle of Dogs and South Poplar include the need for development to support the potential re-designation of Canary Wharf as a Metropolitan Centre. Measures to support a new district centre at Crossharbour and to support existing centres are also identified. A significant positive effect is identified in relation to SA objective 9 'Town Centres'.
- 3.4.165 A recommendation arising from an earlier iteration of the SA of the sub-area visions was that the Development Principles for the Lower Lea Valley could comment on the role of town centres in the sub-area, consistent with the Development Principles for other sub-areas, e.g. are there opportunities to enhance existing centres or create new ones? Commentary on this has been added to the development principles in the Draft Local Plan.
- 3.4.166 All of the sub-area Development Principles are considered to provide significant positive benefits in relation to SA objective 10 'Design and Heritage'. For example, the Development Principles for the City Fringe identify the need to respond to surrounding heritage assets, views and character, to improve the public realm and setting around heritage assets and to sensitively refurbish and reinstate historical buildings and spaces, including the Oval as a London Square and the former Royal London Hospital site (a Grade II Listed Building). The principles also highlight the need to improve the public realm and movement in and around the Tower of London.
- 3.4.167 Significant positive effects in relation to SA objective 11 'Open Space' are identified for the Development Principles for the City Fringe and the Lower Lea Valley because significant infrastructure, e.g. a new north south linear park at Whitechapel is identified in the City Fringe Development Principles.
- 3.4.168 The Development Principles for the Central Area include the need to improve the unique ecological and historic character of the waterways, Mile End Park and Victoria Park. The Development Principles for the Lower Lea Valley include the need to contribute positively towards sustainability, biodiversity and ecology through landscaping that will create a unique building setting by bringing green spaces and wetland areas into the built environment. A significant positive effect is identified against SA objective 13 'Biodiversity' within all sub-areas.
- 3.4.169 An earlier iteration of the SA identified potential for the Development Principles for each sub-area to address more directly the issue of flood risk, particularly in the case of the Isle of Dogs and South Poplar and Lower Lee Valley where significant parts of the sub-areas are at risk of flooding. Whilst it is noted that the general policies in the Local Plan, including ES5 and ES6 provide guidance, perhaps there are additional benefits to be gained from its inclusion. For example, for a topic like biodiversity or built heritage, the role of the sub area design principles is to identify specific factors or opportunities that need to be considered, e.g. the opportunity to create new wetland habitat in the Lower Lea Valley and there may be similar location specific factors that relate to flood risk, e.g. Critical Drainage Areas. The Borough Council has indicated that it considers that other parts of the Local Plan provide sufficient policy in relation to flood risk along with national policy relating to sequential and exceptions testing.

Appraising the Strategic Sites

- 3.4.170 Nineteen strategic sites have been subject to detailed SA against the sixteen SA objectives. The strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The exercise has been updated as part of the IIA for the Regulation 19 version of the Local Plan taking account of the design principles in the Local Plan that provide more detail on how each site should be developed. Two scores are therefore presented for each site, the first is the score given at Regulation 18 stage and the second is the score at Regulation 19 stage, the latter takes account of the development principles for the site and the extent to which these might mitigate any effects identified at Regulation 18 stage. The site appraisal criteria and matrices which report the outcome of this assessment for each strategic site are presented at **Appendix M**. The findings of this appraisal are presented in **Table 3.5** and summarised thematically below.
- 3.4.171 The majority of the strategic sites as assessed at Regulation 18 stage would either have positive or neutral effects on the majority of the SA objectives, with the notable exceptions of SA objectives 10 'Cultural Heritage', 13 'Biodiversity' and 15 'Flood Risk'. The majority of the strategic sites were assessed as giving rise to potential negative effects on these objectives owing to their geographical situation relative to heritage assets, designated sites and flood risk areas respectively.
- 3.4.172 The appraisal scores for sites at the Regulation 18 stage recognise that there is **potential** for a significant effect. Whether or not an effect will happen will, in some cases be dependent on how a site is designed and the mix of uses agreed. So for example, if the Council's requirements for a particular site include an Idea Store the site has been assessed on that basis. Where a site was appraised as having a potential significant negative effect in relation to SA objective 10 'Design and Heritage' because of proximity to a Conservation Area, the actual effect will depend on factors like scale, massing, layout, materials. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan and more specific requirements now identified in the Regulation 19 Draft Local Plan. Where the potential for a negative effect has been identified at Regulation 18 Stage, relevant policies that would help mitigate the effect are noted in the matrices and the Design Principles provided at Regulation 19 stage are also taken into account in arriving at a revised score where one is provided.
- 3.4.173 The following subsections highlight key thematic findings from the appraisal of strategic sites at both Regulation 18 and 19 stages.

Regeneration (SA objectives 1 and 16)

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

Proposed Land Uses (SA objectives 4 and 7)

- 3.4.177 SA objectives 4 and 7 respectively consider whether the strategic site allocations would contribute to the Borough's housing and/or employment land supplies over the Local Plan period. SA objective 4 'Housing' uses a threshold of 500 net new residential units to differentiate between predicted minor and major positive effects on SA objective, whereas SA objective 7 'Employment' only considers whether or not the proposed site allocation included employment uses, because the scale of any employment provision at a site is uncertain at this time.
- 3.4.178 All of the strategic sites included in the Regulation 19 Local Plan include an element of housing, meaning that these sites directly contribute positively to SA objective 4 'Housing' through the provision of new residential units. In particular, twelve of the allocations each include over 500 new residential units and in total, excluding sites already under construction (which are excluded from this SA), the strategic sites are expected to deliver a minimum capacity of 27,260 new residential units (rounded to nearest integer and included a conservative estimate of 500 units for Millharbour South). No information is available at this stage regarding the mechanisms, tenure or phasing of housing delivery on each site, however due to the large-scale of housing proposed it is expected that housing would need to be delivered on a phased basis throughout the Local Plan period. In relation to tenure it is assumed that this would be controlled through development management policies, principally Policy S.H1 and Policy D.H2, rather than through individual site allocations.
- 3.4.179 The majority of the strategic sites currently host industrial, retail, commercial or other employment uses, which could be lost or otherwise adversely affected by redevelopment and change of use proposals. The Regulation 18 version of the Local Plan relied on general policies to ensure that any affected businesses were provided for on site or elsewhere. According to the information available at the Regulation 19 stage in the Local Plan preparation process, all of the sites included in the Regulation 19 Draft Local Plan make provision for employment, including re-provision for existing employment activities present on site, additional employment capacity and uses appropriate to a town centre. The emphasis that the Regulation 19 Draft Local Plan now places on the replacement of employment capacity at relevant sites is welcomed as this will help ensure positive social and economic outcomes for the host communities. As preparation of the Local Plan advances, further clarity may be required regarding the location and parameters of proposed mixed use and employment related land allocations.

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

- 3.4.180 SA Objectives 2 'Liveability', 3 'Health' and 6 'Education' consider whether new community, healthcare and/or education facilities would be provided within development proposals for each of the strategic sites.
- 3.4.181 The majority of the proposed strategic site allocations require development proposals to include a range of onsite facilities: 12 of the strategic sites that have been appraised would deliver new schools; 6 would deliver new / expanded healthcare facilities; and 5 would deliver new or upgraded community, social or leisure facilities. In line with SA objectives 2 'Liveability', 3 'Health' and 6 'Education' this would ensure that these strategic sites incorporate the facilities required to make development proposals acceptable in planning terms and contribute to the wider spatial development of neighbourhoods. In particular, the provision of 12 new schools would allow the Council to continue to fulfil their statutory education duties in the context of projected substantial population growth and could also provide accessible facilities to support community activities, including open space and adult learning opportunities outwith of school hours.
- 3.4.182 Three of the strategic sites appraised do not currently include requirements to provide onsite community, healthcare and/or education facilities, although one delivers strategic open space. However, any development proposals brought forward for these sites would still need to satisfy relevant development management policies, and given the scale of the sites it is expected that developer contributions (or onsite provision in lieu of contributions) towards infrastructure improvements, in particular new or extended schools, may be required to make development proposals acceptable in planning terms. These three strategic sites have therefore been appraised as having neutral effects on SA objectives 2, 3 and 6, as any potential negative effects would be mitigated through planning policy requirements.

Accessibility (SA objective 5)

- 3.4.183 SA objective 5 – ‘Transport and Mobility’ considers accessibility, based solely on the Public Transport Accessibility Level (PTAL) rating assigned by Transport for London to the locality within which each strategic site is located. The PTAL rating provides a relative measure of proximity to frequent public transport services. Therefore, this SA objective is relative rather than absolute and focuses on existing public transport provision, rather than also considering wider potential effects, e.g. effects on the local road network or transport infrastructure provision. The information is based on 2017 data and has been taken from the site context information in the Draft Local Plan. Where a site sits across more than one rating, it has been scored on the basis of the highest rating.
- 3.4.184 **Table 3.5** indicates that the strategic sites would have a range of effects in relation to this SA objective: 9 sites are located within areas with the highest PTAL ratings (5 to 6a/b) and therefore score highly; 3 are located within areas with the lowest PTAL ratings (1 to 2) and therefore score poorly; and all other sites are situated in localities with intermediate PTAL ratings. Regardless of their PTAL rating all development proposals would need to accord with relevant development management policies, which due to the scale of these sites could require transport assessments to be undertaken and, where transport infrastructure deficiencies are identified, could require development proposals to include local transport infrastructure improvements or contribute to strategic transport infrastructure upgrades, in accordance with Spatial Policy S.TR1 ‘Sustainable Travel,’ and D.TR2 ‘Impacts on the Transport Network’. Therefore, the relative and actual accessibility of development proposals on individual strategic sites would need to be determined through the planning application process; at this stage in the Local Plan preparation process the PTAL ratings merely provide an indication of the existing relative accessibility of each strategic site. New development provides the opportunity to deliver the transport infrastructure that will improve scores and the Local Plan includes consideration of the projected PTAL rating for sites by 2031.

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

- 3.4.185 SA objective 8 ‘Economic Growth’ considers whether the allocation proposed for each strategic site would support, increase or result in the loss of employment uses within designated employment and industrial areas, as defined within the Draft Local Plan. Similarly, SA objective 9 ‘Town Centres’ considers whether proposed allocations would increase or adversely affect designated Town Centres, as defined within the Draft Local Plan, though locating main town centre uses, as defined within the NPPF (2012) within or outwith Town Centres.
- 3.4.186 The majority of the strategic sites that have been appraised would have a neutral effect on SA objectives 8 and 9 by virtue of not being located within a defined Town Centre or designated employment area. Five strategic site allocations (including Billingsgate Market and Bow Common Gas Works) would have a significant positive effect on SA objective 8, through providing new employment uses within defined employment areas. Two sites would have a significant positive effect in relation to SA Objective 9 ‘Town Centres’ by including new uses that are appropriate to a town centre.

Open Space (SA objective 11)

- 3.4.187 SA objective 11 ‘Open Space’ considers whether the strategic site allocations include the delivery of strategic-scale (1ha) or local (0.4ha) open spaces. Sites that are anticipated to contribute to strategic open space provision are assessed as having a significant positive effect on the objective. Sites delivering 0.4ha are assessed as having a minor positive effect. It is assumed that other sites would need to provide some open space in order to comply with general policies in the Local Plan, including those which set minimum standards for the quantity and quality of open space provision. In this context, eight sites would have a significant positive effect in relation to this objective by providing strategic open spaces.

Flood Risk (SA objective 15)

- 3.4.188 SA objective 15 considers the existing flood risk affecting each of the strategic sites. The objective does not take account of proposed uses or potential flood risk alleviation measures required

through Draft Local Policies D.ES4 and D.ES5, rather it merely identifies the level of existing flood risk. As such SA objective 15 indicates which strategic sites are likely to require flood risk assessments (including consideration of NPPF sequential and exception tests) to be completed and, if required, flood risk mitigation measures to be incorporated within development proposals.

- 3.4.189 All but four of the strategic sites are located within flood risk areas (either Flood Risk Zone 2 or 3), and therefore score poorly against SA objective 15. Flood risk affecting the strategic sites is primarily associated with the potential for tidal flooding from the River Thames, which bounds many of the proposed waterfront and quayside strategic site allocations, as well as pluvial flood risks resulting from limited surface water run-off pathways within a highly urbanised environment. Four of the strategic sites that have been appraised are not located within Flood Risk Zones 2 or 3 (i.e. they are within Flood Zone 1) and therefore achieve positive scores against SA objective 15.

Environmental Effects (SA objectives 10, 12, 13 and 14)

- 3.4.190 SA objective 10 'Design and Heritage' considers the relationship between the strategic site allocations and designated heritage assets, whilst SA objective 13 'Biodiversity' considers the proximity of the strategic sites to sites designated for reasons of biodiversity conservation or ecological protection. As such these objectives assess potential effects from development on cultural and natural heritage assets. At the Regulation 18 Stage of the Local Plan preparation process, the appraisal necessarily focused on the proximity of strategic sites to relevant assets and designations. The appraisal has been updated to take account of any measures set out in the Regulation 19 Local Plan in the Development Principles for the sub-areas and Design Principles for the site and the extent to which they might mitigate potential effects.
- 3.4.191 The potential for significant negative effect against objective 10 'Design and Heritage' was identified at Regulation 18 Stage in those instances where sites had listed buildings present, where in or near a Conservation Area or within an Archaeological Priority Area. The Design Principles in the Regulation 19 Local Plan have been amended to highlight the need for development proposals to respect existing heritage features and minor positive effects have been identified on that basis. Where sites are within an Archaeological Priority Area but the Design Principles acknowledge the need to respect heritage features a mixed score of minor negative/positive has been given. . General policies in the Local Plan, together with the design considerations for each site, should ensure that heritage is considered as sites come forward for development.
- 3.4.192 It was suggested that the Council considers undertaking Heritage Impact Assessments on relevant sites in order to explore the potential for effects in greater detail, prior to the Local Plan being submitted. The Council has indicated that it has undertaken work to consider the potential for development to impact on heritage in drawing up the proposals for the strategic sites.
- 3.4.193 The Local Plan highlights the need to protect and enhance remaining gasholders for their local character and landmark merit and this approach is supported as it will contribute to Objective 10 'Design and Heritage.'
- 3.4.194 No sites designated at a national or international level for reasons of biodiversity conservation are located within 500m of the strategic sites, however 18 of the strategic site allocations that have been appraised at the Regulation 19 stage are located within 100m of locally designated sites, primarily Local Nature Reserves (LNRSSs) and Sites of Interest for Nature Conservation (SINCS) and therefore could have a minor negative effect on SA objective 13 'Biodiversity' in the absence of mitigation, however the Design Principles for the sites in the Regulation 19 Local Plan identify the need to enhance biodiversity and ecology so a minor positive effect has been identified on this basis .
- 3.4.195 The draft Local Plan includes Policies D.ES3 'Urban greening and biodiversity' and Policy D.OWS3 'Open space and green grid' and D.OWS4 'Water spaces' that should ensure that adequate avoidance and mitigation measures are put in place but highlighting issues at specific sites on a consistent basis would provide further safeguards. The Design Principles for relevant sites have been amended to take on board this comment. Three of the strategic sites (Aspen Way, Chrisp Street and Whitechapel South) are not located within 100m of locally designated sites and therefore have been assessed as having a neutral effect on SA objective 13 'Biodiversity'.

- 3.4.196 All of the strategic sites have been assessed as having a neutral effect on SA objectives 12 'Climate Change' and 14 'Natural Resources' owing to the influence of external factors, e.g. the requirements for development management planning policies, and the lack of availability of detailed information at this stage regarding the treatment of climate change and natural resource issues on a site by site basis. Given the strategic nature of these sites it is considered that it would be more appropriate to consider detailed requirements to address SA objectives 12 and 14 within site specific development frameworks and/or masterplans, which would be prepared in advance of the determination of relevant planning applications.

Table 3.5 Summary of SA of Strategic Site Allocations (Regulation 19 Draft Local Plan)*

Site Name	Site Area (ha)	SA Objective															
		1 Equality	2 Liveability Community Facilities	3 Health and Wellbeing	4 Housing	5 Transport and Mobility	6 Education	7 Employment	8 Economic Growth	9 Town Centres	10 Heritage	11 Open Space	12 Climate Change	13 Biodiversity	14 - Natural Resources	15 Flood Risk	16 Contaminated Land
Alisa Street	5.76	++	0	0	++	+	+	0	0	+	+	0	+	0	0	-	++
Aspen Way	6.10	+	+	0	++	+	+	0	0	+/	++	0	0	0	0	-	++
Billinggate Market	5.74	0	0	0	++	+	++	++	0	+	+	0	+	0	0	-	++
Bishopsgate Goods Yard	4.24	0	+	0	++	+	++	++	0	+	++	0	+	0	0	++	+
Bow Common Gas Works	3.94	+	0	0	+	+	++	++	0	+	+	0	0	0	0	-	+
Chris Street Market	3.62	++	+	0	++	+	++	++	0	+	+	0	+	0	0	-	+
Crossharbour District Centre	4.89	0	+	++	++	+	++	++	0	+	+	0	+	0	0	-	++
Leven Road Gas Works	8.56	++	0	0	++	+	++	++	0	+/	++	0	+	0	0	-	++
Limeharbour	4.87	0	0	0	++	+	++	++	0	+	++	0	+	0	0	-	+
Marian Place Gas Works and The Oval	3.75	+	+	0	+	+	++	++	0	+	++	0	+	0	0	++	+
Marsh Wall East	3.42	0	0	++	+	+	++	++	0	+	+	0	+	0	0	-	+
Marsh Wall West	6.39	0	0	++	++	+	++	++	++	+	+	0	+	0	0	-	++
Millharbour	3.58	+	0	++	+	+	++	++	++	+	+	0	+	0	0	-	+
Millharbour South	4.09	0	0	++	++	+	++	++	+	+	+	0	+	0	0	-	+
North Quay	3.27	0	0	0	+	+	++	++	++	0	+	0	+	0	0	-	+
Reuters LTD	2.71	0	0	0	+	+	++	++	0	+/	+	0	+	0	0	-	+
Riverside South	2.17	0	0	0	+	+	++	++	+	+	+	0	+	0	0	-	+
Westferry Printworks	6.16	0	+	0	++	+	++	++	0	+	++	0	+	0	0	-	++
Whitechapel South	9.5	+	0	+	+	+	++	++	0	+	++	0	0	0	0	++	++

* Two additional sites are not included in this table as they are already under construction: London Dock (City Fringe Sub area) and Wood Wharf (Isle of Dogs/Poplar Area)

3.5 Cumulative, Synergistic and Secondary Effects of Policies and Sites

- 3.5.1 The matrices for each section at **Appendix L** identify those instances where potential cumulative effects are anticipated, including synergistic effects.
- 3.5.2 A summary of potential cumulative effects from each group of draft policies upon each SA objective, together with a commentary outlining specific predicted cumulative effects, is provided in **Table 3.6**. Potential cumulative effects have been identified through professional judgement having regard to the overall performance of policies and how they might interact against specific SA objectives.
- 3.5.3 **Table 3.6** indicates that in overall terms the majority of the draft policy groupings are considered to contribute positively to each of the SA objectives. However, the strength and nature of the relationship varies between policy groupings and there is no clear relationship between some policy groupings and some individual objectives. The final column of **Table 3.6** provides commentary on the nature of potential interactions and cumulative or synergistic effects between the draft policy groupings.
- 3.5.4 Consideration has also been given to the potential for cumulative effects associated with strategic sites in **Table 3.6**. This demonstrates the potential for positive cumulative effects associated with SA objective 1 'Equality' as a number of sites fall within areas of high deprivation within the Borough. Sites are also assessed as having a positive cumulative effect in relation to SA objectives 3 'Health and Wellbeing,' 4 'Housing,' 6 'Education' and 11 'Open Space' as sites will help deliver new homes and infrastructure to serve needs across the Borough. The strategic sites will help deliver significant growth that could help support existing centres and overall a significant positive effect is identified against SA objective 9 'Town Centres'. All sites involve the re-use of previously developed land and buildings, which could include addressing a legacy of contaminated land, a significant positive effect against SA objective 16 on contaminated land.
- 3.5.5 **Table 3.7** considers the potential for in-combination effects associated with the Draft Local Plan and other plans and programmes.

Table 3.6 Potential Cumulative and Synergistic Effects from Draft Policies

SA Objectives	Potential Cumulative and Synergistic Effects	Strategic Sites	Improving connectivity and travel choice	Managing our waste	Protecting and managing our environment	Enhancing open spaces and water spaces	Supporting community facilities	Revitalising our town centres	Delivering economic growth	Meeting housing needs	Creating attractive and distinctive places	Achieving sustainable growth
<p>1. Equality: Reduce poverty and social exclusion and promote equality for all communities.</p>	<p>The draft housing, employment, town centre and open space policies all direct development proposals to highly accessible locations. This could help a range of demographic groups to access facilities, services, employment and housing, and thereby reduce social exclusion. The co-location of these land uses within highly accessible locations, in particular within town centres and at public transport hubs, would result in a major positive synergistic effect on this SA objective because new developments would be accessible to each other as well as to existing housing and community facilities.</p> <p>Strategic sites contribute positively to this objective and a significant cumulative positive effect against this objective is anticipated.</p>	++	0	0	+	++	++	++	+/?	++	0	+
<p>2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services</p>	<p>With the exception of the draft employment and town centre policies, which in overall terms are not directly relevant to this SA objective, all other draft policy groupings direct development proposals to accessible locations. They also require development proposals to include adequate and high quality community and social infrastructure, and require development proposals to safeguard amenity. Acting together, the policy groupings would therefore ensure that development proposals demonstrate good placemaking by providing suitable access to a range of land uses and facilities in appropriate locations and by enhancing the quality of the built environment. This would directly increase the liveability of neighbourhoods and therefore have a positive synergistic effect on this SA objective.</p> <p>Strategic sites could help deliver this objective but overall it is considered that the potential for significant effects has been identified elsewhere in the assessment.</p>	0	++	+	+	++	++	+	0	++	++	++
<p>3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.</p>	<p>Cumulative effects for this SA objective are identified on the basis that some policies will help provide the environment that contributes to health and well-being, e.g. good quality, affordable housing, access to employment and opportunities to walk and cycle. Other policies areas will help ensure access to a range of health facilities in sustainable locations.</p> <p>Strategic sites will help deliver new health facilities, contributing positively to this objective.</p>	++	+	+	++	++	++	+	+	++	++	+

Potential Cumulative and Synergistic Effects	
Strategic Sites	++
Improving connectivity and travel choice	0
Managing our waste	0
Protecting and managing our environment	0
Enhancing open spaces and water spaces	++
Supporting community facilities	++
Revitalising our town centres	0
Delivering economic growth	0
Meeting housing needs	++
Creating attractive and distinctive places	0
Achieving sustainable growth	0
SA Objectives	
4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.	<p>There is potential for the draft community facilities and open space policies to work in synergy with the draft housing policies to contribute towards the liveability aspects of this SA objective, resulting in a significant positive effect.</p> <p>Strategic sites will help deliver new housing, contributing positively to this objective.</p>
5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.	<p>With the exception of the draft sustainable growth policies, which in overall terms do not have a major effect on this SA objective, all other draft policy groupings direct development proposals to highly accessible locations and require active travel infrastructure to be provided. Acting together this would ensure that new developments are both accessible and contribute to the wider development of more sustainable transport networks, resulting in a minor positive synergistic effect on this SA objective.</p> <p>Sites have been assessed on their PTAL rating, resulting in a range of scores. General policies in the Draft Local Plan require development to deliver improvements to transport infrastructure which strategic sites could help deliver but an uncertain effect has been identified at this stage.</p>
6. Education: Increase and improve the provision of and access to childcare, education and training facilities for all age groups and sectors of the local population.	<p>Specific policies within the draft housing, community facilities and, to a lesser extent, open space policy groupings, contribute to this SA objective and could result in positive cumulative effects. In particular, policy H6 requires residential development proposals not to result in over-development and Strategic Policy CF1 requires development proposals to contribute positively to maintaining and expanding existing, and delivering new, social infrastructure. Acting together, these policies would ensure that residential development proposals avoid increasing pressure on existing education infrastructure and where relevant also provide new facilities, which would increase access to education opportunities.</p> <p>A number of sites will help deliver new education facilities, contributing to this objective.</p>
7. Employment: Reduce worklessness and Increase employment	<p>The draft housing, employment and town centre policy grouping all direct development proposals to highly accessible locations. The co-location of these land uses, in particular within town centres and at public transport</p>

Potential Cumulative and Synergistic Effects	
Strategic Sites	hubs, would result in a positive synergistic effect on this SA objective as new employment developments would be accessible to both existing communities and new residential developments, thereby enhancing physical access to employment. However, none of the draft policies seek to tackle other barriers to employment or to reduce worklessness. The strategic sites will help deliver significant growth that could help support economic growth and replace any existing employment capacity on site.
Improving connectivity and travel choice	
Managing our waste	
Protecting and managing our environment	
Enhancing open spaces and water spaces	
Supporting community facilities	
Revitalising our town centres	
Delivering economic growth	
Meeting housing needs	
Creating attractive and distinctive places	
Achieving sustainable growth	
SA Objectives	
opportunities for all residents	
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	All of the draft policy groupings seek to support economic growth, either directly through encouraging new economic uses in appropriate locations, or indirectly through setting out criteria to deliver increased housing provision, supporting infrastructure and high quality built environments. In particular, the draft housing, employment, town centre and transport policies all set out criteria to safeguard and support new investment, encourage economic diversification and direct new housing and employment uses to highly accessible locations. Acting together, these policies would create appropriate conditions to allow economic growth in a sustainable manner and would therefore have a positive effect on this SA objective. The strategic sites will help deliver significant growth that could help support economic growth.
9. Town Centres: Promote diverse and economically thriving town centres.	All of the draft policy groupings direct development proposals to highly accessible locations, in particular within the town centre hierarchy, and set out criteria to avoid the over-concentration of uses with potential negative impacts. Acting together, the policies would co-locate development proposals within the Borough's Town Centres and therefore protect and increase their vitality and vibrancy, resulting in a positive cumulative effect on this SA objective. In addition, there is a potential interaction between the draft town centre and employment policy groupings, as some of the defined town centres and designated employment areas, which the respective policies direct development proposals to, overlap. A range of effects were identified in relation to this objective for strategic sites, depending on the nature of development and the location of sites in relation to town centres. The strategic sites will help deliver significant growth that could help support existing centres and overall a significant positive effect is identified.

Potential Cumulative and Synergistic Effects	
SA Objectives	
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	<p>The draft design and historic environment, open space and environmental sustainability policy groupings require development proposals to be appropriately designed and integrated with their surroundings, as well as to mitigate predicted environmental and amenity impacts. These policy groupings interact and directly seek to improve the quality of the built environment, although no specific synergistic effect is predicted.</p> <p>In the absence of mitigation, the assessment of strategic sites at the Regulation 18 stage identified the potential for negative effects in relation to this objective. There are general policies in the Draft Local Plan that seek to ensure that development does not adversely affect heritage features and the Design Principles for some strategic sites in the Regulation 19 Local Plan highlight the need for development to protect and enhance relevant assets, however there are four sites where the potential for negative effects remain. The cumulative effects of development are judged to be uncertain at this stage.</p>
11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.	<p>The draft community facility, design and historic environment, environmental sustainability, open space and developer contributions policy groupings all set out interacting requirements for the safeguarding and provision of high quality open spaces within development proposals. In particular, the interaction of policy criteria regarding open space provision, quality and useability would generate a positive synergistic effect on this SA objective through enhancing the Borough's network of open spaces.</p> <p>Strategic sites will help contribute to this objective by delivering open space, including strategic open space.</p>
12. Climate change: Ensure the Local Plan incorporates mitigation and adaptation measures to reduce and respond to the impacts of climate change.	<p>With the exception of the draft sustainable growth policies, which in overall terms do not have a major effect on this SA objective, all other draft policy groupings direct development proposals to highly accessible locations and require active travel infrastructure (including high quality public realm) to be provided. The co-location of new developments in accessible locations with active travel infrastructure would reduce the need for car travel and encourage sustainable modal shifts, thereby reducing greenhouse gas emissions. In addition, the draft design and historic environment policies set</p>
Achieving sustainable growth	0
Creating attractive and distinctive places	++
Meeting housing needs	0
Delivering economic growth	0
Revitalising our town centres	0
Supporting community facilities	0
Enhancing open spaces and water spaces	++
Protecting and managing our environment	+
Managing our waste	+
Improving connectivity and travel choice	0
Strategic Sites	?

SA Objectives	Achieving sustainable growth	Creating attractive and distinctive places	Meeting housing needs	Delivering economic growth	Revitalising our town centres	Supporting community facilities	Enhancing open spaces and water spaces	Protecting and managing our environment	Managing our waste	Improving connectivity and travel choice	Strategic Sites	Potential Cumulative and Synergistic Effects
												<p>out criteria to minimise energy use across the lifetime of new developments, which would also contribute to climate change mitigation.</p> <p>Performance against this objective at the site level was judged to be neutral and potential significant effects associated with general policies that will contribute to the achievement of this objective have been captured elsewhere in the assessment.</p>
<p>13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.</p>	+	+	+	0	0	0	++	+	+	0	?	<p>The draft sustainable growth, housing, design and historic environment, environmental sustainability, open spaces and developer contributions policy groupings all set out criteria to ensure that development proposals are appropriately sited, high-quality, well-designed and sustainable. All of these policy groupings therefore require consideration of amenity and environmental/pollution impacts within the design and determination of development proposals, which in general terms could help to conserve and enhance habitats and biodiversity. In addition, the open space requirements within these policy groupings would help to conserve, enhance and improve connectivity between a range of habitats, with consequential positive cumulative effects on biodiversity.</p> <p>In the absence of mitigation the potential for minor negative effects was identified at the site level in the majority of cases at Regulation 18 stage. The Regulation 19 Local Plan includes Design Principles for sites, including some relating to Biodiversity, however this is not universal. The potential for cumulative effects is uncertain – although general policies in the Local Plan should contribute to the achievement of positive outcomes in relation to Biodiversity.</p>
<p>14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste</p>	+	+	+	+	+	++	++	++	++	+	?	<p>All of the draft policy groupings direct development proposals to highly accessible locations and seek to create liveable neighbourhoods. The co-location of developments in accessible locations could indirectly safeguard air quality by reducing car travel needs and encouraging sustainable modal shifts, resulting in a positive synergistic effect on this SA objective.</p> <p>Performance against this objective at the site level was judged to be neutral but, given the scale of development in the Borough the overall effect in relation to this objective is judged to be uncertain.</p>

SA Objectives	Potential Cumulative and Synergistic Effects		
<p>15. Flood risk reduction and management: To minimise and manage the risk of flooding</p>	<p>The draft design & historic environment, environmental sustainability and open space policy groupings set out interacting requirements for the safeguarding and provision of high quality open spaces, which could help to sustainably manage surface-ruff off and therefore reduce flood risks. However, no specific cumulative or synergistic effects are predicted.</p> <p>Areas of the Borough are at risk of flooding and a number of sites are in flood risk areas. The potential for significant negative effects has been identified on a site by site basis. The cumulative effects of development should not be significant if each site addresses the need for attenuation and storage and defences and a strategic approach is taking to the provision of flood risk infrastructure as the plan envisages. The potential for a residual negative effect has been identified.</p>		
<p>16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.</p>	<p>Given that development in the Borough would predominantly involve the use of previously developed land and buildings, which if contaminated would require appropriate remediation, the draft housing and employment policy groupings are likely to have an indirect positive effect on this SA objective. However, no cumulative or synergistic effects are predicted.</p> <p>All sites involve the re-use of previously developed land and buildings, which could include addressing a legacy of contaminated land, a significant positive effect.</p>		
Strategic Sites		-	++
Improving connectivity and travel choice		0	0
Managing our waste		0	0
Protecting and managing our environment		++	+
Enhancing open spaces and water spaces		+	++
Supporting community facilities		0	0
Revitalising our town centres		0	0
Delivering economic growth		0	+
Meeting housing needs		0	+
Creating attractive and distinctive places		++	0
Achieving sustainable growth		+	+

Table 3.7 Potential In-combination Effects Associated with Other Plans and Programmes

SA Objectives	Comments	Score
<p>1. Equality: Reduce poverty and social exclusion and promote equality for all communities.</p>	<p>The focus of this SA objective is around reducing poverty and social exclusion within the Borough and the extent to which development will occur in the most deprived areas. The review of plans and programmes at Appendix E identifies relevant documents, including the Health and Wellbeing Strategy (refreshed in 2012), Mental Health Strategy 2014 and Fuel Poverty Strategy and Action Plan.</p> <p>The Draft Local Plan and other documents also have a role in tackling barriers that can contribute to poverty and social exclusion, for example relating to poor public transport accessibility in areas such as Fish Island and the Isle of Dogs and physical barriers to walking and cycling. There is potential for in-combination effects associated with the Draft Local Plan, Tower Hamlets Walking Plan (2011) and the Olympic Legacy Area (Olympic Legacy Supplementary Planning Guidance).</p> <p>There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.</p>	+
<p>2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services</p>	<p>This SA objective is concerned with the extent to which the Draft Local Plan will help ensure that all residents to services, facilities and amenities near their home, such as schools, early years provision, council services, libraries and idea stores, community and faith facilities, leisure centres, open space and play areas and neighbourhood shops, as well as there being adequate infrastructure in place. It also relates to wider aspects of liveability, including the quality of the public realm and perceptions of safety and crime. The Draft Local Plan will help deliver additional school places (identified through Planning for School Places, which is updated annually). The Draft Local Plan seeks to provide a high quality public realm and design out crime, there are synergies with the Tower Hamlets Community Safety Plan (2014). There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.</p>	+
<p>3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.</p>	<p>This SA objective focusses on the provision of new health facilities and access to facilities that help promote active lifestyles and tackle health inequalities. The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the Health and Wellbeing Strategy (refreshed in 2012) and the Mental Health Strategy 2014. The Draft Local Plan will help to deliver new health and community facilities and provides the policy context to safeguard/replace existing facilities. The Draft Local Plan seeks to provide new open space, safeguard existing spaces and improve connectivity between spaces. There is a potential synergy with the All London Green Grid SPD (2012) and Tower Hamlets Green Grid Strategy (2010). The Draft Local Plan will also help deliver new idea stores consistent with the 'Idea Store Strategy' 2009, which include the provision of health information and advice. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.</p>	+
<p>4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.</p>	<p>This SA objective relates to the provision of housing and the quality of housing available, including factors like energy and heat efficiency. The Draft Local Plan seeks to contribute to anticipated housing need and to ensure that a range of housing is provided, including affordable housing and specialist housing. The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the Council's 'Supporting People Strategy' (2011), the 'Older Peoples Housing Statement' (2013) and the Mayor's London Housing Strategy (2014), through which a number of policies will flow, including improvements to the existing housing stock. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.</p>	+
<p>5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p>	<p>This SA objective relates to transport connectivity both within the borough and beyond, modal shift away from the car and enhanced capacity of the transport network. The Draft Local Plan seeks to direct development that generates a high number of trips to Town Centres and/or areas with high levels of public transport accessibility and to encourage the use of public transport, walking and cycling. The Local Plan also requires the movement of goods and materials associated with new development considers its impacts on the transport network and amenity.</p> <p>The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the Tower Hamlets Local Implementation Plan 2 (2011), Tower Hamlets Walking Plan (2011) and Cycling Plan (2015). The Mayor's Transport Strategy and the Mayor's Transport Strategy Accessibility Implementation Plan, 2012. Transport for London has a programme of measures for developing public transport provision across the borough: upgrades to the Central and Jubilee Lines are scheduled, as well as opportunities to enhance the capacity of the</p>	+

SA Objectives	Comments	Score
	DLR. The new Elizabeth Line stations at Whitechapel and Canary Wharf will also enhance accessibility. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these strategies, plans and programmes.	
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.	This SA objective relates to accessibility to and provision of facilities for education and training. The Draft Local Plan will help deliver additional school places (identified through Planning for School Places, which is updated annually). The Draft Local Plan will also help deliver new Idea stores consistent with the 'Idea Store Strategy' 2009, which include the provision of training and support services. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and this document.	+
7. Employment: Reduce worklessness and increase employment opportunities for all residents	This SA objective relates to the ability of local people to access employment, the removal of barriers to employment and tackling worklessness. The Draft Local Plan contains a range of policies to protect existing employment space and areas, provide for a range of new employment related opportunities and encourage local recruitment. 'WorkPath' ⁸ is an employment service for all Tower Hamlets residents, providing support for people at all levels of work, skill or experience which will work in synergy with the Local Plan. The Draft Local Plan will also help deliver new Idea stores consistent with the 'Idea Store Strategy' 2009, which will provide employment related information, advice and support. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.	+
8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.	This SA objective relates to the resilience of existing businesses in the Borough and its ability to accommodate new economic development. The Draft Local Plan contains a range of policies to protect existing employment space and areas, and provide for a range of new employment related opportunities. The Lower Lea Valley Opportunity Area encompasses land in the London Boroughs of Hackney, Newham and Waltham Forest as well as Tower Hamlets and there is potential for in-combination effects as development comes forward in these authorities, with potential for a total of 50,000 jobs identified (Lower Lea Valley Opportunity Area Planning Framework' Mayor of London, 2007). There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.	+
9. Town Centres: Promote diverse and economically thriving town centres.	This SA objective relates to the vitality of existing centres and the creation of a hierarchy of centres that meets future needs. The Local Plan contains policies that establish the hierarchy of centres, direct appropriate development to town centres and create new centres. The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the Town Centre Strategy for Tower Hamlets which seeks to deliver a range of measures to improve town centres, including partnership working and governance, public realm improvements, improvements to street markets, business promotion and place promotion to increase footfall. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and the Town Centre Strategy.	+
10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.	This SA objective relates to the enhancement and conservation of heritage and cultural assets. The Draft Local Plan includes policies The review of plans and programmes at Appendix E includes the Borough's Conservation Strategy, which is currently being refreshed (draft document produced November 2016). This highlights issues associated with buildings on the Heritage at Risk Register and the need to find new uses for some buildings as they cease to be fit for purpose for their current use, e.g. public baths. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and the Conservation Strategy, for example the Local Plan provides the basis for securing Section 106 contributions from developments that can be used on existing heritage features.	+

⁸ http://www.towerhamlets.gov.uk/ignl/jobs_and_careers/employment_and_training_initial/Workpath/WorkPath.aspx

SA Objectives	Comments	Score
<p>11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.</p>	<p>This SA objective is concerned with the provision of open space, including addressing existing shortfalls and improving existing spaces and improved connectivity between spaces. The Draft Local Plan contains a range of policies that seek to protect and enhance existing green and blue space and deliver new space.</p> <p>The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the London Plan - All London Green Grid Supplementary Planning Document and Area Framework for Lee Valley and Finchley Ridge (GLA, 2012), Tower Hamlets Green Grid Strategy (2010) and the Open Spaces Strategy (2006). There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents.</p>	+
<p>12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</p>	<p>This SA objective relates to climate change adaptation and mitigation. The Draft Local Plan requires development to accord with the energy hierarchy and enable decentralised energy provision. The Draft Local Plan contains a range of policies that seek to ensure that development incorporates climate change adaptation measures and that the Urban Heat Island effect is combated.</p> <p>The London Plan requires development proposals to incorporate measures to reduce carbon dioxide emissions and to have energy supplied by Cooling and Combined Heat and Power (CHP) wherever feasible (Policy 5.2). There is therefore the potential for cumulative positive effects associate with the provision of CHP and reductions in CO2 emissions across London.</p> <p>The Urban Heat Island effect is an issue within the centre of London and the London Plan (Policy 5.9) requires major developments to demonstrate how overheating and cooling will be achieved. Further details and guidance regarding overheating and cooling are outlined in the London Climate Change Adaptation Strategy. There is therefore the potential for positive cumulative effects across London associated with tackling the urban heat island effect.</p>	+
<p>13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.</p>	<p>This SA objective relates to the conservation and enhancement of habitats, improved connectivity between sites the protection of designated sites and species and access to nature. The Draft Local Plan includes policies which requires development to protect and enhance biodiversity, protect trees and designated sites and species. It also requires improvements to the value, quality and accessibility of open space across the Borough. The review of plans and programmes at Appendix E includes the Borough's Biodiversity Action Plan (2014), which includes a range of actions to enhance biodiversity, this compliments London wide action set out in the London Biodiversity Action Plan (a suite of documents relating to specific habitats). There is therefore potential for positive in-combination effects associated with the Draft Local Plan, the Borough's Biodiversity Action Plan and London wide initiatives.</p>	+
<p>14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste</p>	<p>This SA objective relates to the use and protection of natural resources including water, land and air and the production of waste. The Draft Local Plan includes policies relating to the protection of water, land, air quality and waste.</p> <p>The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the Mayor's Air Quality Strategy and Sustainable Design and Construction Strategy 2010.</p> <p>There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents. However, it is also acknowledged that additional growth in dwellings in London will lead to cumulative effects associated with greater resource use, hence mixed positive and negative score is provided under this objective.</p>	+/-
<p>15. Flood risk reduction and management: To minimise and manage the risk of flooding</p>	<p>This SA objective relates to minimising the risk of flooding to people and property, promoting sustainable urban drainage systems, management of surface water run-off, especially in Critical Drainage Areas and that regard is had to the Thames Estuary 2100 Action Plan for managing flood risk through London and the Thames estuary (2012).</p> <p>The draft Local Plan includes policies relating to development in flood risk areas and the incorporating of sustainable urban drainage in new developments. The Draft Local Plan also requires that adequate flood defence infrastructure is in place over the lifetime of the development.</p>	0

SA Objectives	Comments	Score
	<p>The review of plans and programmes at Appendix E includes the Local Flood Risk Management Strategy (LFRMS). Analysis in the LFRMS identifies potential risk of flooding from sewer surcharge, and surface water flooding because of heavy rainfall and limited capacity of drainage infrastructure. This is known to be an issue within Critical Drainage Areas (CDAs) in the Borough, in particular, the Isle of Dogs. The LFRMS includes measures to address surface water flooding. The Strategy outlines a range of measures to manage flood risk. There is therefore potential for positive in-combination effects associated with the Draft Local Plan and the Local Flood Risk Management Strategy.</p> <p>In terms of the potential for cumulative effects, the Draft Local Plan includes measures to reduce the risk of flooding which will be complemented by other measures in the LFRMS (a potential positive cumulative effect) but, at the same time, the Local Plan is increasing the population living and working within areas of flood risk and development that could increase the amount of surface water and rates of run-off. Overall a mixed positive/negative in-combination effects are identified.</p>	
<p>16. Contaminated Land: Improve land quality and ensure mitigation of adverse effects of contaminated land on human health.</p>	<p>This SA objective relates to maintenance and improvement of soil quality, mitigation of adverse effects of contaminated land on human health and development of brownfield sites.</p> <p>The review of plans and programmes at Appendix E identifies relevant documents that also relate to this objective, including the Lower Lea Valley Opportunity Area encompasses land in the London Boroughs of Hackney, Newham and Waltham Forest as well as Tower Hamlets and there is potential for in-combination effects as development comes forward in these authorities and previously developed land and buildings are remediated and brought back into use.</p> <p>There is therefore potential for positive in-combination effects associated with the Draft Local Plan and these documents in relation to this SA objective.</p>	+

3.6 Key Findings from the HIA

- 3.6.1 The HUDU Rapid HIA Assessment Matrix is at **Appendix I**.
- 3.6.2 Section 1 of the matrix relates to housing quality and design and promotes the use of the 'Lifetime Homes Standard and Building Regulation M4 (2)'. The Lifetime Homes standard is a voluntary set of 16 design criteria that provide a model for building accessible and adaptable homes. Building Regulation Requirement M4 (2) relates to accessible and adaptable dwellings, M4 (3) relates to wheelchair user dwellings. National Planning Practice Guidance (Reference ID 560007-20150327) states that it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4 (2) and / or M4 (3) based on their housing needs assessment and other available datasets.
- 3.6.3 The Government set out an approach for the setting of technical standards for new housing (Ministerial Statement, 25th March 2015). This means that local authorities only have the option of to set additional technical standards for housing in relation to access and water.
- 3.6.4 The Mayor of London has also produced a set of housing standards, including minimum dimensions for rooms, which also encourage building accessible and adaptable homes. The standards also reference the Mayor's Housing Design Guide and Housing Supplementary Planning Guidance.
- 3.6.5 The following policies in the Draft Local Plan are relevant to section 1 of the matrix (Housing quality and design):
- ▶ Policy D.H3 'Housing standards and quality' – which includes a requirement for 10% wheelchair accessible units across all tenures, consistent with London Plan Policy 3.8 B d);
 - ▶ Policy D.H4 relates to the protection and provision of specialist housing; and
 - ▶ Policy S.H1 'Meeting Housing Needs' encourages the use of the Home Quality Mark, which will be a voluntary scheme to replace the Code for Sustainable Homes. The Home Quality Mark, is more comprehensive in scope than the Lifetime Home Standards.
- Given the Ministerial Statement of 25th March 2015 the Council is limited to what it can require. The Local Plan must also be in conformity with the London Plan. The Draft Local Plan encourages the use of the Housing Quality Mark but can only do so on a voluntary basis. Policies D.H3 and D.H4 also seek to secure and protect accessible and adaptable housing.
- 3.6.6 Section 2 of the matrix relates to 'Access to healthcare and other social infrastructure'. The London Borough of Tower Hamlets has developed a growth model for understanding and monitoring population change and growth to plan for the timely and adequate provision of infrastructure and services for local people. Completion of the matrix highlights the need to keep the model under review as the Local Plan develops. This will help ensure that positive outcomes are associated with criteria in the matrix relating to community facilities and infrastructure.
- 3.6.7 Section 3 of the matrix relates to 'Access to open space and nature'; Section 4 relates to 'Air quality, noise and neighbourhood amenity'; and Section 5 relates to 'Accessibility and active travel'. Positive outcomes are anticipated in respect of all three sections and no suggestions for changes to the policies in the Draft Local Plan were put forward.
- 3.6.8 Section 6 of the matrix relates to 'Crime reduction and community safety' and includes question on whether the assessed proposal incorporates elements to design out crime. Policy D.DH2 'Attractive streets, spaces and public realm' requires development to improve safety and perception of safety to pedestrians including elements to design out crime and fear of crime and improving the public realm to enable interchange between different transport modes.
- 3.6.9 Positive outcomes were identified in relation to the following Sections 7 'Access to healthy food'; 8 'Access to work and training'; 10 'Minimising the use of resources'; and 11 'Climate Change.'

- 3.6.10 Section 9 on ‘Social cohesion and lifetime neighbourhoods’ references the six key components of Lifetime Neighbourhoods, which are taken from Government research, (Lifetime Neighbourhoods, Department for Communities and Local Government, December 2011). These are:
- ▶ Empowering residents to develop lifetime neighbourhoods – especially resident empowerment;
 - ▶ Access – enabling residents to connect with services and facilities, both physically and virtually;
 - ▶ Services and amenities – a mix of residential, employment and retail uses;
 - ▶ Built and natural environments – environments that promote safe, inclusive access to key services and facilities. Outdoor spaces and buildings that promote social contact. Locally accessible greenspace;
 - ▶ Social networks/well-being – informal/formal opportunities and activities, where people feel safe and confident and which respect the needs of different ages, cultures and ethnicities;
 - ▶ Housing – a range of choices, inclusive design principles and homes designed to meet changing needs.
- 3.6.11 Policy 7.1 of the London Plan and Section 7.5 of the Mayor’s Housing Standard also relates to the concept of Lifetime Neighbourhoods.
- 3.6.12 Although the Local Plan does not use the term ‘Lifetime Neighbourhoods’ extensively (there are two references in the development principles for the Lower Lea Valley) it is clear from a review of the principles that policies in the Local Plan are consistent with the principles. Relevant policies include:
- ▶ Policy S.SG2 ‘Delivering sustainable growth in Tower Hamlets’ is consistent with the principles relating to access, service and amenities, built and natural environments and social networks and housing;
 - ▶ Policy S.TR1 ‘Sustainable travel’ is consistent with the principle relating to access;
 - ▶ Policy S.CF1 ‘Supporting community facilities’ seeks to protect existing community facilities and provide new ones – providing opportunity for social networking and access to services and amenities; and
 - ▶ Policy S.H1 ‘Meeting housing needs’ is consistent with the principle relating to housing.
- 3.6.13 The results suggest that policies will help to secure development that will contribute to a range of positive effects. These relate to factors like housing, transport and mobility, access to healthy food; access to work and training; minimising the use of resources; and climate change.
- 3.6.14 A recommendation arising from earlier iterations of the HIA was that the Local Plan could reference designing out crime principles more generally, e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010). Policy D.DH2 ‘Attractive streets, spaces and public realm’ now references the principle.

3.7 Key Findings from the EqIA

- 3.7.1 As noted in Section 2.10 of this report, the Council has developed a two-stage approach to the analysis of equality issues. The first stage involves completion of a Quality Assurance Checklist. The checklist is a tool to assess whether the requirement that due regard is given to minority groups in the decision-making and activities of the Council is embedded and evidenced. Further analysis may be undertaken as a natural progression from the Quality Assurance when there are concerns about the impacts of the ‘proposal’ and, or, evidencing of ‘due regard’ requirements.
- 3.7.2 Question 1 of the QA checklist asks if the outcome of the Draft Local Plan are clear. The response notes that the plan provides a spatial strategy for the Borough and policies to manage growth. Relevant aspects of the Draft Local Plan are considered below.

- 3.7.3 The Draft Local Plan sets out the Council's intention to roll forward planning policy to 2031. The Draft Local Plan sets out a suite of policies that are intended to provide the policy context for new development up to 2031 and are centred on a vision for the Borough and two key objectives. The vision acknowledges the Borough's role as the focus for London's growth. The vision states that the Borough will be home to a wide range of diverse communities, existing communities will be supported and new residents welcomed. The Local Plan embeds the One Tower Hamlets principles into Policy S.SG2 'Delivering sustainable growth in Tower Hamlets.'
- 3.7.4 The two key objectives are 1) managing the growth and shaping change and 2) sharing the benefits of growth. Each objective is underpinned by a set of principles. The first objective seeks to ensure that growth contributes to identify social and economic need, which will include the needs of those who share Protected Characteristics. The second objective is supported by the principle that growth must help reduce social, economic and environmental inequalities and promote community cohesion, existing health inequalities must also be reduced. The vision and key objectives are supported by a suite of policies, which include:
- ▶ Policy S.SG2 'Delivering sustainable growth in Tower Hamlets' which includes the need for the creation of mixed and balanced communities, incorporating inclusive design principles, local training and employment opportunities and infrastructure and public realm improvements that are accessible to all;
 - ▶ Policy S.H1 'Meeting housing needs' sets out requirements in relation to the provision of affordable housing;
 - ▶ Policy D.H2 'Affordable housing' which seeks to secure a range of housing and the regeneration of housing estates. It also safeguards an existing Gypsy and Traveller site;
 - ▶ Policy D.H4 relates to the protection and provision of specialist housing;
 - ▶ Policy D.H5 'Gypsy and traveller accommodation', is a criteria based policy on the future provision of accommodation for the Gypsy and Traveller community; and
 - ▶ A range of policies seek to ensure access to facilities and services, including public transport, health facilities, education, places of worship and community facilities, e.g.;
 - ▶ Policy S.CF1 'Supporting community facilities;'
 - ▶ Policy D.CF2 'Existing community facilities; and
 - ▶ Policy S.TR1 'Sustainable travel'.
- 3.7.5 The Local Plan identifies strategic sites that can help meet development needs to 2031 and the Local Plan indicates that the Borough Council can meet housing and employment targets over the plan period.
- 3.7.6 A detailed review of Local Plan policies has been undertaken and has not identified any instances where the content of policies would give rise to adverse effects on people who share Protected Characteristics.
- 3.7.7 The Local Plan is a Borough wide document that will potentially impact on all of those who live, work and visit the Borough. Based on a desk top review of the content of the Draft Local Plan and discussion with the Equalities team no instances have been identified where the content of policies would give rise to adverse effects on people who share protected characteristics. The potential for impacts on protected characteristics are summarised below.
- 3.7.8 The legislative requirements relating to Marriage and Civil Partnership are only relevant in the context of the Borough Council's role as an employer and are not therefore relevant to the EqIA for the Draft Local Plan.
- 3.7.9 In terms of race - with the exception of the Gypsy and Traveller policy (D.H5) no policies in the Draft Local Plan are targeted towards or against this equality group.

- 3.7.10 Policies relating to inclusive design (S.SG1 and S.H1) and achieving a range of accessible, adaptable and specialist housing (D.H2 and D.H4) will be relevant to age and disability. The provision of opportunities for employment and policies to secure opportunities for local people will also be relevant to these groups.
- 3.7.11 Policy S.CF1 includes provision for places of worship and could therefore enable the protection of existing facilities and provision of new/improved facilities for any religions/belief, where the criteria in Policy DM CF3 are met. Policy D.CF2 protects existing community facilities and Policy D.CF3 sets out criteria for the provision of new and enhanced community facilities.
- 3.7.12 No policies in the Draft Local Plan are targeted towards or against the following groups:
- ▶ Religion/Belief;
 - ▶ Gender reassignment;
 - ▶ Sexual orientation; and
 - ▶ Pregnancy / maternity.
- 3.7.13 A suggestion from a previous iteration of the Equality Analysis Quality Assurance Checklist was that the policy team considered consulting with or briefing other groups meeting during the consultation period on the Draft Local Plan, e.g. groups identified in the Council's Single Equality Framework such as Community Forums, Local Voices and other relevant local groups. The Council confirmed that it had undertaken additional consultation at Regulation 18 stage. At the Regulation 19 stage, contact will be made with all groups contacted at the Regulation 18 stage.
- 3.7.14 Based on the completed Equality Analysis Quality Assurance Checklist for the Regulation 18 Draft Local Plan, a full EqIA was not considered necessary at that stage in the process as the Draft Local Plan exhibits due regard to the Council's Public Sector Equality Duty. Rather steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop. The approach to this assessment was discussed with the Council's Senior Strategy, Policy and Performance Officer (Equality) officer who confirmed that completion of the QA checklist was sufficient. The review of the Regulation 19 Draft Local Plan has come to the same conclusion.

3.8 Key Findings from the HRA

- 3.8.1 The HRA considered potential effects on the following sites:
- ▶ Epping Forest Special Area of Conservation (SAC);
 - ▶ Richmond Park SAC;
 - ▶ Wimbledon Common SAC;
 - ▶ Lee Valley Special Protection Area (SPA); and
 - ▶ Lee Valley Ramsar.
- 3.8.2 Analysis of the available European site data and the SSSI condition assessments indicate that the most common reasons for an 'unfavourable' condition assessment of the component SSSI units are effects associated with public access; air pollution; and inappropriate management of some form (e.g. over- or undergrazing, scrub control, water-level management etc.). Public access and air pollution are essentially 'in combination' pressures associated with the general development of London. A number of threats to the sites are also identified (e.g. climate change; non-native invasive species) which have the potential to undermine the conservation objectives.
- 3.8.3 All of the sites are at least 3 km outside the Borough boundary and so the plan will not influence development within the immediate vicinity of the sites; any effects will therefore be 'indirect', associated with the general quantum of development operating 'in combination' with other plans

and projects. This also means that the locations of site allocations within the Borough are effectively neutral as far as effects on European sites go.

- 3.8.4 The assessment assessed the potential for the plan to affect five European sites within 15km of the Borough boundary: Epping Forest SAC, Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA and Lee Valley Ramsar. It is considered that the plan is unlikely to have any measureable effects on sites beyond this due to the absence of reasonable impact pathways. With regard to the sites considered, Richmond Park SAC and Wimbledon Common SAC will also be unaffected due to the distances and absence of impact pathways. Natural England confirmed by email on the 5th of May 2017 that the approach and scope of the HRA as set out in the report that accompanied the Regulation 18 consultation document were acceptable.
- 3.8.5 The policies in the Draft Local Plan have been reviewed, taking into account the interest features of the relevant European sites and the likely outcomes of the policies as drafted. Policies may have effects in their own right, or they may be used to control potential effects or prevent them occurring. A policy should be considered 'likely' to have an effect if the competent authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site, either alone or in combination with other plans or projects; an effect will be 'significant' if it could undermine the site's conservation objectives. However, it is important that the policy assessment focuses on effects that are objectively possible, rather than just imaginable; furthermore, it is not appropriate for policies to simply re-state existing legislation.
- 3.8.6 The initial HRA screening conclusion is that the plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.
- 3.8.7 However, Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to minimise the residual risk through appropriate policy measures designed to minimise the risk of exposure occurring (e.g. air quality assessment requirements or policy controls on locally accessible public space). Therefore, the policy review summarised in Table 4.11 of the HRA identifies policies that would benefit from amendments to maximise their effectiveness in reducing residual risk. In particular:
- ▶ Air Quality: it was recommended that the policy on air quality in the Local Plan be used to help ensure that development arising from the draft Local Plan plays a full part (with other plans) in reducing diffuse air pollution that may affect Epping Forest SAC. It was suggested that the text of the policy (or supporting text) require that air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC; the text within the existing local plan is likely to be appropriate as it requires new development to be air quality neutral but an explicit reference to the need to consider the potential impacts of diffuse pollution on European sites would be helpful. Other policy controls and options may be available (Natural England and the Environment Agency may be able to provide further guidance in this regard, particularly as the Epping Forest Council Local Plan is being prepared on a similar timescale to Tower Hamlet's Local Plan). The Local Plan highlights the need to consider air quality impacts on European sites in the supporting text to Policy D.ES2 in relation to air quality; and
 - ▶ Public Access: It is unlikely that visitor pressure on Epping Forest SAC will increase significantly as a result of the draft Local Plan, such that the draft Local Plan needs to include specific mitigating measures (e.g. Suitable Alternative Natural Greenspace (SANGS), and existing and planned public space in and near the Tower Hamlets area (e.g. The Olympic Park and the Lea River Park) are likely to provide some moderating effects in any case. The policy requirements for the Borough can therefore be more holistic, by ensuring that policies and development controls collectively provide the local recreational amenities (e.g. traffic-free walks / paths; green networks; etc.) that are likely to reduce the incentive to regularly travel to Epping Forest SAC. This is largely achieved, although more emphasis or obligation could be placed on developers

to clearly demonstrate how policies S.OWS1, S.OWS2 and D.OWS3 are met, including consideration of the potential for any adverse effect on European sites as part of their proposals. The supporting text to D.ES3 has been amended to highlight the potential need for HRA in relation to recreational pressure;

- ▶ Although the risk to European sites is low due to existing controls and distances from receptors, it is suggested that the following clause in D.SG4 “*Consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required*” be modified to reflect the need for public utility capacity to be confirmed available before development proceeds. The Borough Council has indicated that it considers this to be an overly burdensome demand – given responsibility rests both with the utility provider and developer.

3.8.8 These suggestions/amendments will be explored with Natural England through consultation on the Draft Local Plan and this report.

3.9 Compliance with National Planning Policy Framework

3.9.1 The policies in the Draft Local Plan have been reviewed against the requirements of the NPPF (see **Appendix N** for details). The review found these to meet the requirements of the NPPF in respect of the topics to be covered by local plan policy. **Table 3.8** summarises the relationship between the policy group and the relevant NPPF paragraphs, which indicates that there is appropriate policy coverage. No policy gaps were identified. This conclusion is undertaken with the caveat that it is understood that future iterations of the Draft Local Plan will need to demonstrate employment requirements to 2031 and how they will be met in order for the Local Plan to be found sound but it is recognised that work on this is on-going.

Table 3.8 High level review against the NPPF

NPPF Paragraphs of relevance to LBTH	Local Plan Response
Presumption in Favour of Sustainable Development (6 – 17)	The chapter on Policy Context in the Regulation 18 version of the Local Plan acknowledged the presumption in favour of sustainable development but the text has not been retained in the Regulation 19 Draft Local Plan. It was recommended that this be reinstated but the Council has indicated that it considers that the principle is adequately covered in the Local Plan. Spatial Policies S.SG1 to 4 sets out proposals to secure sustainable growth, supported by the other policies in the Local Plan.
Building a Strong and Competitive Economy (18 – 22)	Policy S.EMP1 and Policies D.EMP2 to 4.
Ensuring the Vitality of Town Centres (23 – 27)	Policy S.TC1, Policy D.TC2, policies D.TC3 to TC7.
Promoting Sustainable Transport (29 – 41)	Policy S.TR1 and Policies D.TR2 to 4.
Supporting High Quality Communications Infrastructure (42 – 46)	Policy D.DH11
Delivering a Wide Choice of High Quality Housing (47 – 55)	Policy S.H1 and Policies D.H2 to D.H7.
Requiring Good Design (56 – 68)	Policies S.H1 and D.H2. Policies D.DH5 to D.DH11.
Promoting Healthy Communities (69 – 77)	Spatial Policies S.SG1, S.SG2, D.SG3, S.H1, D.H2, S.CF1 and Policies D.CF2, D.CF3, D.CF4 and D.OWS3.
Meeting the challenge of climate change, flooding and coastal change (93 -108)	S.SG2, D.SG3, D.ES9, D.ES4, D.ES5, D.ES6, D.ES7.

NPPF Paragraphs of relevance to LBTH	Local Plan Response
Conserving and Enhancing the Natural Environment (109 – 125)	Policies D.ES3, S.OWS1, S.OWS2, D.OWS3 and D.OWS4
Conserving and Enhancing the Historic Environment (126 – 141)	Policy S.DH1, Policies S.DH3, D.DH4, S.DH5.

3.10 Monitoring

- 3.10.1 It is a requirement of the SEA Directive and associated Regulations to establish how the significant sustainability effects of implementing the Local Plan will be monitored. However, as earlier government guidance on SEA (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects, including unforeseen adverse effects. Monitoring the Local Plan for sustainability effects can help to answer questions such as:
- ▶ Were the predictions of sustainability effects accurate?;
 - ▶ Is the Local Plan contributing to the achievement of desired SA objectives?;
 - ▶ Are mitigation measures performing as well as expected?; and
 - ▶ Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?
- 3.10.2 Monitoring should be focussed on:
- ▶ Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
 - ▶ Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
 - ▶ Where there is the potential for effects to occur on sensitive environmental receptors.
- 3.10.3 The Scoping Report did give consideration to potential sources of indicators associated with the baseline and this is attached as **Appendix D**. It will be important that any monitoring regime associated with the SA is embedded within monitoring associated with the Local Plan and other Council workstreams, so as to avoid duplication of effort.
- 3.10.4 The Regulation 19 Local Plan includes a section on monitoring and this has been reviewed to see whether or not it would help meet the requirements for monitoring under the SEA Directive. The extent to which proposed monitoring indicators relate to the SA objectives has been examined in order to identify any potential gaps in monitoring. The results of this work are set out in **Table 3.9**. From the review the only SA objective that does not appear to be covered by an indicator is SA objective 16 relating to contaminated land (which relates to the SEA topic of soils). It was suggested in an earlier iteration of the SA that an indicator relating to soils be added to the proposed list of indicators. The Borough Council does not consider such an indicator to be necessary as soil quality is currently monitored through the Environmental Health Service. The proposed indicators in the Local Plan will enable this. Additional information in relation to soils could be provided through the Environmental Health Service if necessary.

Table 3.9: Review of Proposed Monitoring Indicators against the SA Objectives

Topic and Indicators from the Local Plan (Table 6 in Part 6)	Sustainability Appraisal Objective
<p>Meeting housing needs</p> <ul style="list-style-type: none"> ▶ KMI 1: Growth in homes and employment within specified sub areas ▶ KMI 3: Net additional homes in the monitoring year and previous years ▶ KMI 4: Five-year housing land supply and fifteen year housing trajectory ▶ KMI 5: Percentage of new homes that are affordable 	<ol style="list-style-type: none"> 1. Equality: Reduce poverty and social exclusion and promote equality for all communities. 4. Housing: Ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.

Topic and Indicators from the Local Plan (Table 6 in Part 6)	Sustainability Appraisal Objective
<ul style="list-style-type: none"> ▶ KMI 6: Percentage breakdown of all housing tenures ▶ KMI 7: Net additional non-conventional homes (including student beds and specialised housing) ▶ KMI 8 Delivery of wheelchair accessible/adaptable homes ▶ KMI 9: Gypsies and Travellers pitches ▶ 	
<p>Delivering economic growth</p> <ul style="list-style-type: none"> ▶ KMI 10: Net additional employment floorspace delivered by type ▶ KMI 11: Net additional jobs by type ▶ KMI 12: Count of births of new enterprises ▶ KMI 13: Gain/loss of floorspace within the following Designated Employment Areas: <ul style="list-style-type: none"> • Preferred Office Locations • Local Office Locations • Strategic Industrial Locations • Local Industrial Locations 	<p>7. Employment: Reduce worklessness and increase employment opportunities for all residents.</p> <p>8. Economic Growth: Create and sustain local economic growth across a range of sectors and business sizes.</p>
<p>Revitalising our Town Centres</p> <ul style="list-style-type: none"> ▶ KMI 14: Proportion and number of ‘town centre uses’ (A1/2/3/4/5, B1a, D1 & D2) within all town centres ▶ KMI 15: Town Centre Vacancy Rates ▶ KMI 16: Approvals and completions of additional short-stay accommodation ▶ KMI 17: Pitches and vacancy in council-owned public street markets 	<p>9. Town Centres: Promote diverse and economically thriving town centres.</p>
<p>Supporting Community Facilities</p> <ul style="list-style-type: none"> ▶ KMI 18: Applications and permissions for new/loss of D1/D2 community uses 	<p>1. Equality: Reduce poverty and social exclusion and promote equality for all communities.</p> <p>2. Liveability: Promote liveable, safe, high quality neighbourhoods with good quality services.</p>
<p>Creating attractive and distinctive places</p> <ul style="list-style-type: none"> ▶ KMI 19: Number of designated heritage assets (Scheduled Ancient Monuments, Listed Buildings Registered Parks and Gardens, Conservation Areas) ▶ KMI 20: Percentage of planning appeals upheld due to design KMI 21: Removal of heritage assets at risk from the risk register 	<p>10. Design and Heritage: Enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.</p>
<p>Enhancing open and water spaces</p>	<p>3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.</p>

Topic and Indicators from the Local Plan (Table 6 in Part 6)	Sustainability Appraisal Objective
<ul style="list-style-type: none"> ▶ KMI 23: Area of land designated as open space (loss or gain from previous year) KMI 24: Number of eligible open spaces that have been awarded the Green Flag standard 	<p>11. Open space: Enhance and increase open spaces that are high quality, networked and multi-functional.</p>
<p>Safeguarding our environment</p> <ul style="list-style-type: none"> ▶ KMI 25: Area of land designated as a Site of Nature Conservation Interest (SINCs) ▶ KMI 26: Number of developments approved against Environment Agency advice in relation to flood risk and water quality grounds ▶ KMI 27: Carbon dioxide emission reduction ▶ KMI 28: Concentration of each pollutant at each monitoring station ▶ KMI 29: The number of developments that meet or exceed the air quality neutral standards 	<p>3. Health and wellbeing: Improve the health and wellbeing of the population and reduce health inequalities.</p> <p>12. Climate change: Ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.</p> <p>13. Biodiversity: Protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.</p> <p>14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.</p> <p>15. Flood risk reduction and management: To minimise and manage the risk of flooding.</p>
<p>Managing our waste</p> <ul style="list-style-type: none"> ▶ KMI 30: Household waste recycled, reused and composted (also represented as a household recycling rate) ▶ Recycling, reuse and composting per borough resident ▶ Municipal waste sent to landfill and sent to treatment 	<p>14. Natural Resources: Ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.</p>
<p>Transport</p> <ul style="list-style-type: none"> ▶ KMI 23: Section 106 for traffic, highways and public transport ▶ KMI 24: Public satisfaction with public transport ▶ KMI 25: Number of on-street car club spaces ▶ KMI 26: Total distance of cycle and pedestrian networks ▶ KMI 27: Number of TfL cycle docking stations in the borough ▶ KMI 28: Loss/gain of depots and wharfs 	<p>5. Transport and mobility: Create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.</p>

3.11 Recommendations (including Mitigation)

3.11.1 Recommendations arising from the different elements of the IIA are set out in **Table 3.10**. This includes earlier recommendations made by the IIA on previous working drafts of the Local Plan. **Table 3.10** details where these earlier recommendations have been actioned and where they are outstanding in the fourth column. This reflects the iterative nature of the IIA, demonstrates the influence that the IIA has had on the development of the Local Plan to date and provides an audit



trail of any recommendations outstanding. The remaining actions will be considered by the Council, along with consultation responses to the Draft Local Plan, to inform the next iteration of the plan.

Table 3.10: Summary of Recommendations

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
General comment	All	New recommendation (Regulation 19 stage). Review policies to ensure that they are compliant with the NPPF, i.e. positively worded. This will potentially reduce the number of modifications required at Examination stage and the need to re-screen policies for potential significant effects. This recommendation applies particularly to the spatial policies, e.g. using terms like 'will be supported' or 'will be permitted'.	The Borough Council considers the latest draft to have addressed this comment.
Spatial Strategy	N/A	New recommendation (Regulation 19 stage). The Local Plan should acknowledge the presumption in favour of sustainable development.	The Council's view is that the plan is its response to the presumption in favour of sustainable development and policies S.SG1 and S.SG2 provide a localised strategic approach towards delivering sustainable development in the borough. The Council does not see the benefit in a generic policy. There is one in the current Managing Development DPD but it is rarely used.
Spatial Strategy	N/A	As early as possible (we suggested in the introduction) the amended draft Local Plan should acknowledge the role that the London Plan has in determining the scale and distribution of development in the Borough, both in terms of the number of homes and jobs to be provided and the role of the Opportunity Areas (City Fringe/Tech City, Lower Lea Valley and Isle of Dogs and South Poplar) in meeting this target.	Addressed - Chapter 1 'Introduction acknowledges the role of the London Plan with the Policy Context set out more fully in Chapter 2 'Setting the Scene.

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
	<p>The overall contribution of allocations and non-allocated sites to meeting the requirements set out in the London Plan are not clear. It will be key in terms of the IIA being able to make conclusions on the overall effects of the Local Plan and understanding the distribution of development between the Opportunity Areas and Central Area.</p> <p>A previous recommendation at Regulation 18 stage was that the plan needed to identify a dwelling requirement to 2031 and how it would be met.</p> <p>The Local Plan notes that the London Plan will be amended again by 2017. Consistent with other Local Plans in London it would be prudent for the Local Plan to have a policy setting out a commitment to review the Local Plan once the London Plan is amended.</p> <p>The Local Plan could have a policy that sets out the Council's intention to support the production of NDPs.</p> <p>There is a need for some text that links the spatial strategy, with the general policies in the Local Plan as these will have an important role in shaping development in the Borough.</p> <p>The Plan could also indicate which policies support the key objectives and detailed implementation considerations in order to identify that there are no gaps in policy.</p> <p>It is not clear if the intention of the Council is to promote the Central Area as a new Opportunity Area that should be recognised in the London Plan.</p>	<p>Addressed - Plan includes information on the overall contribution of Strategic Sites to meeting housing need to 2031 and also information on supply from other sources.</p> <p>Each of the sub areas have identified the number of homes to be delivered. It can be further divided to set out how much of the site allocations will be contributing towards this delivery.</p> <p>This recommendation has been partly addressed, as the Regulation 19 Draft Local Plan identifies the housing need to 2031 (58,965) and the contribution from identified sites but this amounts to 54,100 dwellings, a shortfall of 4,865, with additional text on how this shortfall might be met over the plan period has been included.</p> <p>The chapter of the Local Plan on monitoring and review considers this issue.</p> <p>Addressed –Key Objective 2 'Sharing the Benefits of Growth' references support to the process of Neighbourhood Planning. Section 4 on 'Delivering Sustainable Places' also identifies the role of NDPs.</p> <p>Addressed – Relevant text added to the Draft Local Plan.</p> <p>Addressed – policy linkages between policies are indicated.</p> <p>Addressed – the Council has confirmed that the central area will not be promoted as an Opportunity Area and this is referenced in the Regulation 19 Draft Local Plan.</p>	

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
Sustainable Growth in Tower Hamlets	S.SG1 and S.SG2	To enhance the contribution of Policy S.SG1 towards the SA objective for health and wellbeing, it is recommended that the supporting text could reference the Healthy Urban Development Unit's 'Healthy Urban Planning Checklist' (June 2015).	Addressed – Supporting text to D.SG3 includes a reference to the HUDU checklist.
D.SG4		Recommendation from the HRA related work - <i>Consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required</i> be modified to reflect the need for public utility capacity to be confirmed as available before development proceeds.	Whilst Thames Water have requested such a policy, the Borough Council has indicated that it considers this to be an overly burdensome demand – given responsibility rests both with the utility provider and developer.
The Economy	Strategic Policy EMP1 and 2 and Policies EMP3 to 5	The Chapter on the Economy does not currently identify a target for new jobs/floorspace over the plan period – presumably the intention is to do that as it will be fundamental to demonstrating that the plan is sound and also assist the IIA. Nor does the chapter demonstrate the anticipated contribution that the Plan will make to employment growth.	Addressed – Policy S.EMP1 sets out the target for job growth over the plan period and the role of existing commitments etc to achieving this (Table 4 identifies the shortfall of supply and paragraph 5.5 indicates that capacity exists in the Borough to make up the shortfall).
		Policy EMP1 may be amended to require a site to be marketed for 24 months, rather than 12 months. We support the requirement for sites to be marketed (and the other criteria set out in the policy); however, 24 months may not be reasonable – is the Council aware of any recently adopted plans in London or elsewhere that have successfully required a 24 month marketing period? We note that this policy is subject to the outcome of the Employment Land Review. EMP3 should refer to sites being continuously marketed for a 24 month period.	Justification for 24 month marketing period addressed – references now added to the Employment Land Review (2016) in the Regulation 19 Draft Local Plan. The recommendation that evidence of sites being continuously marketed for a 24 month period has also been addressed in D.EMP3.
		Consider adding a justification for the presumption against live-work and work-live units set out in policy (relevant policy is now EMP3).	Addressed – in the justification to Policy D.EMP2.
		Add a reference to the Council's Planning Obligations SPD to ensure that local people and existing firms have the chance to benefit from local training, employment/procurement during both construction and operational phases S.SG1 references these principles.	Addressed - S.SG2 references these principles.
		To avoid potential conflict with Town Centre policies within the Local Plan it is recommended that Strategic Policy EMP1 should clarify the	The Council has indicated that the policies as drafted are considered to provide sufficient clarity and from a review of the Regulation 19 Local Plan the SA team concur.

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
		relationship between, and appropriate land uses, where designated employment or industrial areas and defined Town Centres overlap.	
Housing delivery	Strategic Policy H1 Delivering Housing and Policies H2 to H6.	Policy H1 safeguards the existing Gypsy and Traveller site at Old Willow Close. It is recommended that the site is identified on the Proposals Map once it is prepared.	This will be included on the policies map (site now safeguarded through Policy S.H1.
	Policy H1	Recommendation from HRA - Based on the available data it is unlikely that the quantum of development proposed will result in significant effects on European sites due to visitor pressure, although it would be worthwhile adding or strengthening the requirements for public access and space (perhaps explicit linkages to the relevant policies) with a requirement on developers to facilitate access to local public space.	The supporting text to Policy D.ES3 has been amended to include reference to the potential need for Habitats Regulations Assessment in relation to increased recreational pressure.
Transport and connectivity	Strategic Policy TRN1 Sustainable Travel and TRN2 to TRN4 Sustainable Transport and Freight	The intentions of Policy TRN2 (previous numbering) are supported however it is suggested that the authors consider whether or not the justification for the policy could provide advice on how future applications should demonstrate a) public transport accessibility is appropriate b) public transport can accommodate the development. Policy TRN1 could reference the Cycling Plan for Tower Hamlets (2009)	Addressed in the text on implementation to Policy D.TR2
		The justification for Policy TRN1 could reference the Walking Plan for Tower Hamlets (2011-2021)	The Borough Council has indicated that the Walking Plan is outdated and it is therefore not appropriate to reference it.
Town centres	Policies Strategic Policies TC.1 and TC.2 and Policies TC3 to TC9	Consider adding a reference to the Greater London Authority's (GLAs) SPG on Town Centres in the introductory text. Consider amending Policy TC.0 (d) (previous numbering) to include a list of District Centres. Consider adding justification at Policy TC.2 (3) for solid shutters not being permitted, e.g. to make the area more welcoming in the evening. Policy TC.4 could cross-reference the Council's Statement of Licensing Policy.	References to the SPG have been added to the evidence links on parts of the policy where the SPG is relevant Addressed in Policy S.TC1 Addressed – justification for D.DH9 'Shopfronts.' Addressed - supporting text to D.TC5.

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
		<p>Consider whether the policy relating to the night-time economy (TC.4) could draw more from the GLA's SPG on Town Centres (pages 23 to 24).</p>	<p>References to the SPG have been added. It is considered that the SPG has been appropriately reflected and incorporated into the Local Plan, particularly within this policy and the specific public house policy in the Community Facilities chapter. Other matters such as night-time levies are not appropriate for the Local Plan.</p>
Open space	<p>Strategic Policy OWS1 and OWS2 and Policy D.OWS3 and D.OWS4.</p>	<p>It was previously suggested that the Plan could acknowledge the All London Green Grid and the contribution that green spaces within the Borough contribute to it. It is noted that a reference to the All London Green Grid has been added to the supporting text.</p>	<p>Addressed – Chapter 8 on Enhancing open spaces and water spaces references the All London Green Grid.</p>
Design and historic environment	<p>Strategic Policies DH1 and DH2 and Policies DH3 to DH11</p>	<p>Consider whether or not Policy D5 reflects the language and principles set out in the NPPF at paragraphs 132 to 134 and paragraph 138 in relation to the significance of designated heritage assets and their conservation, the concepts of substantial and less than substantial harm etc.</p>	<p>Addressed in Policy S.DH3.</p>
		<p>Consider splitting Policy D5 into two parts, one dealing with proposals affecting designated assets and one dealing with non-designated assets because the NPPF advocates different approaches to them.</p>	<p>Not addressed, relevant policy is now S.DH3 but Historic England content with policy so recommendation withdrawn.</p>
		<p>Consider whether or not the same comments apply to Policy D6: World Heritage Sites, for example the language used in relation to assessing harm on their setting and the extent to which this is consistent with the NPPF.</p>	<p>Addressed - Policy S.DH5 adopts appropriate terminology.</p>
		<p>Consider a reference to 'designing out crime' principles in this section.</p>	<p>Addressed, Policy D.DH2 'Attractive streets, spaces and public realm'.</p>
Community facilities	<p>Strategic Policy CSF1 and CSF2 and Policies CSF3 to CSF9</p>	<p>Heritage Impact Assessment - Undertake Heritage Impact Assessment for Strategic Sites that are allocated in the Local Plan</p> <p>Consider an explicit reference to the provision of community facilities through shared spaces, e.g. in Policy C1.</p>	<p>Consideration has been given by the Borough Council to the potential impact of strategic sites on built heritage.</p> <p>Addressed - Encouraging shared facilities, where appropriate, is referenced in Key Objective 1 under implementation and the supporting text to S.CF1 and D.CF3.</p> <p>Policy amended.</p>

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
		<p>A new recommendation is that Policy CF1 needs modifying along the following lines in order to comply with the NPPF: <i>Development will be supported where it:</i> <i>Protects existing community facilities;</i> <i>Improves the capacity, quality, usability and accessibility of existing facilities</i> <i>etc</i></p>	
Urban greening and biodiversity	Policy ES3	<p>Consider whether or not the Plan could be more explicit in terms of a) the areas that might be affected by the Heat Island effect and b) the timescale over which the potential for this issue should be considered.</p> <p>Policy ES2 seeks to project Sites of Importance for Nature Conservation but may not be fully compliant with the NPPF as it misses the opportunity to seek mitigation or compensation (paragraph 118 of the NPPF refers).</p>	<p>Addressed – the justification for Policy D.ES3 identifies types of areas that can experience the Heat Island effect and also specific designations that may be more susceptible.</p> <p>Addressed in Policy D.ES3.</p>
The Environment	Policy ES2 Policy ES4 Policy ES5,	<p>1) Policy ES4 is supported but needs to be justified, i.e. the supporting text should acknowledge that the Borough is in an area of water stress.</p> <p>2) Policy ES4 - the policy should be reworded to refer to 'European sites' and the provisions of the Habitats Directive, with an appropriate definition within the supporting text. 3) The policy could also include reference to Sites of Special Scientific Interest (SSSI).</p> <p>4) Policy ES2 on improving air quality could highlight the need for proposals that would give rise to diffuse air pollution to consider the potential for effects on European sites.</p> <p>Previous recommendation relating to reference to voluntary schemes like the Housing Quality Mark be incorporated elsewhere in the draft Plan.</p>	<p>1) Addressed in the justification for Policy D.ES6 2) Addressed in D.ES3. 3) The Council have amended the Local Plan to indicate the presence of a SSSI at Epping Forest. 4) Addressed in the supporting text to D.ES3.</p> <p>Addressed in Policy S.H1 'Meeting housing needs.' The Plan also makes it clear that use of the standard is voluntary.</p>
Developer Contributions	Policy DC1	<p>Previous observation – did the Local Plan provided the necessary 'policy hook' for the Planning Obligations SPD.</p>	<p>Addressed - Policy D.SG4 provides the hook for the SPD.</p>
Delivering Sustainable Places	Sub-areas	<p>The Development Principles for the Lower Lea Valley could comment on the role of town centres in the sub-area, consistent with the Development Principles for other sub-areas.</p> <p>The Development Principles for the Lower Lea Valley could comment on the need to explore expansion of the Borough's energy network.</p> <p>The Development Principles for the Isle of Dogs and South Poplar could comment on education related infrastructure.</p>	<p>The role of town centres in the Lower Lea Valley sub-area has been addressed.</p> <p>Biodiversity will be addressed as a key development principle.</p> <p>However, reference to education and flood risk will be a repetition to the policies and site allocations requirements.</p>

Policy Group	Policies (note policy numbering in this column may relate to previous versions of the Local Plan).	Opportunities Previously Identified to Amend Content (note policy numbering in this column relates to previous version of the Plan)	How has the Draft Local Plan Responded (note policy numbering in this column relates to the Regulation 19 version of the Local Plan)?
	<p>The Development Principles could comment on specific opportunities relating to biodiversity.</p> <p>The Development Principles could comment on specific opportunities relating to key flood risk management/infrastructure measures, particularly in the Lower Lea Valley and the Isle of Dogs and South Poplar.</p>		
Managing change	<p>Previously suggested new policy</p>	<p>Previous suggestion for a new policy that highlights the need to manage potential effects associated with the delivery of new development, including measures to ensure that effective community engagement takes place and that the construction phase is managed.</p>	<p>Addressed in D.SG4.</p>
Site capacity	<p>N/A</p>	<p>For the purposes of undertaking the IIA (and demonstrating soundness) it would be helpful if the schedule included the anticipated housing/employment capacity of each site and the proportion anticipated to be developed within the plan period.</p>	<p>The appropriate level of housing and employment for each site allocation should be accessed through the development management process to take account of site constraints such as heritage and local character. Reference will be made that all site allocations will have the ability to deliver at least 500 new homes.</p>
Design Principles for sites	<p>Review all Design Principles and include constraints and opportunities in relation to cultural heritage and biodiversity where appropriate – consistent with other sites where these are already highlighted.</p>		<p>Review undertaken and text update.</p>
Justification for site selection	<p>LBTH to confirm if there are any potential strategic sites that have not been included and a justification for their exclusion, together with a justification for the inclusion of the sites selected. It is noted that many sites are carried forward from the Core Strategy and Managing Development Document.</p>		<p>LBTH has confirmed that no potential strategic sites were rejected. The SA has been updated to reflect those sites that were included in the Regulation 18 Local Plan but not carried forward into the Regulation 19 Local Plan.</p>
Consultation	<p>Page 5 of document</p>	<p>Is there scope to consult or brief other groups meeting during the consultation period, e.g. groups identified in the Council's Single Equality Framework, e.g. Community Forums and Local Voices</p>	<p>Addressed – additional consultation undertaken at Regulation 18 stage.</p>
Monitoring	<p>N/A</p>	<p>The Local Plan could include an indicator in relation to soils, in order to comply with the SEA Directive and enabling regulations.</p>	<p>The Borough Council does not consider such an indicator to be necessary as it is currently monitored through the Environmental Health Service.</p>



4. Conclusions and Next Steps

4.1 Introduction

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

4.2 Key Conclusions Emerging from the Appraisal and Plan Making Process

- 4.2.1 The Draft Regulation 19 Local Plan builds on the Regulation 18 document, a new policy has been added in relation to the Spatial Strategy and policies in some topic areas, e.g. town centres have been amended.
- 4.2.2 Consistent with the Regulation 18 draft Local Plan, the Regulation 19 Draft Local Plan that is being consulted on sets out the intention for strategic planning for the Borough to be more closely aligned with the London Plan. This is achieved by placing greater emphasis on the Opportunity Areas within the Borough identified in the London Plan. The Draft Regulation 19 Local Plan provides a vision, two key objectives, implementing considerations and a set of policies to control development in the Borough. It also includes a number of strategic sites; the scale of these sites and associated timescales for their development means that many are carried forward from previous planning policy documents. Some sites that were identified at Regulation 18 stage have not been carried forward into the Regulation 19 Local Plan as Strategic sites for reasons set out in Section 3 of this Report.

Sustainability Appraisal

- 4.2.3 The SA has identified the potential for the vision, key objectives and policies to make to a range of economic, social and environmental factors. The policy appraisal matrices are provided at **Appendix J**. No significant policy gaps were identified. A key recommendation relating to both policies and sites, made in previous iterations of the SA, was for the Regulation 19 Local Plan to be clearer about the contribution that new development could make to employment provision, including the role of the Strategic Sites. The land-use requirements for strategic sites have been amended to include the need for employment provision.
- 4.2.4 A number of detailed recommendations in relation to general policies were made at the Regulation 18 stage and by and large these have been addressed. Some new recommendations have been made, for example that a policy on the presumption in favour of sustainable development is needed. **Table 3.10** provides a summary of recommendations and the Council's response to them.
- 4.2.5 The Development Principles for the sub-areas have been appraised and the matrices are at **Appendix L**. It is acknowledged that there is some potential for the appraisal to replicate some of the beneficial effects associated with other elements of the Local Plan and the London Plan, for example in relation to the delivery of new infrastructure but the Development Principles add value by providing the link between the London Plan (which identifies the Opportunity Areas), Policy S.SG1 of the Draft Local Plan (which confirms the spatial strategy for the borough) and the strategic sites in the Local Plan that fall within each of the sub-areas.
- 4.2.6 The nineteen strategic sites that are included in the Regulation 19 Local Plan have been appraised. Many are major sites identified in the Managing Development Document (April 2013). Two further strategic sites that are also included in the plan are already under construction and therefore have not been appraised.
- 4.2.7 The strategic sites have been appraised using tailored appraisal criteria and associated thresholds of significance. The site appraisal criteria and matrices which report the outcome of this assessment for each strategic site are presented at **Appendix M**. The findings of this appraisal are

presented in **Table 3.5** and it indicates that the majority of the strategic sites would either have positive or neutral effects on the majority of the SA objectives, with the exception of SA objective 15 'Flood Risk'. Performance against objectives 10 and 13 has improved when compared to the Regulation 18 Local Plan because account has been taken of the Design Principles for each site, where relevant and the extent to which these would help avoid or mitigate significant negative effects. Whether or not an effect will happen will, in some cases be dependent on how a site is designed and the mix of uses agreed. The majority of the strategic sites give rise to potential negative effects on these objectives owing to their geographical situation relative to heritage assets, designated sites and flood risk areas respectively. Any proposals that come forward will need to demonstrate that they are consistent with the general policies in the Local Plan. There are uncertainties around the contribution that sites could make to employment provision at this stage, the Draft Local Plan seeks to protect and re-provide employment space where relevant but the contribution of Strategic sites to the provision of new employment floorspace is uncertain at this time.

Health Impact Assessment

- 4.2.8 The HIA used the HUDU Rapid HIA Assessment Matrix to analyse the impact of the Local Plan and the results are summarised in **Section 3.6** and **Appendix G**. The results suggest that policies will help to secure development that will contribute to a range of positive effects. These relate to factors like housing, transport and mobility, access to healthy food; access to work and training; minimising the use of resources; and climate change. A previous recommendation arising from the HIA at Regulation 18 stage was that the Local Plan could reference designing out crime principles more generally, e.g. Secured by Design (Association of Chief Police officers. Secured by Design, New Homes 2010) and the recommendation has been incorporated in the Draft Local Plan in Policy D.DH2 'Attractive streets spaces and public realm'.

Equalities Impact Assessment

- 4.2.9 The EqIA was undertaken of the Local Plan and the results are summarised in **Section 3.7** and **Appendix H**. The Local Plan is a Borough wide document that will potentially impact on all of those who live, work and visit the Borough. There are policies in the Draft Local Plan which, while not focussed on people who share Protected Characteristics, could have significant positive effects. These include policies relating to housing, employment, transport and mobility and inclusive design. The provision of adaptable and accessible housing will bring positive outcomes for the disabled and others. The safeguarding and provision of accommodation for Gypsies and Travellers are also positive. Based on the Equality Analysis Quality Assurance Checklist, a full EqIA is not necessary at this stage in the process as the Draft Local Plan exhibits due regard to the Council's Public Sector Equality Duty. Rather steps will be taken to ensure due regard for the nine protected groups is embedded in the process to produce and the policies of the Local Plan as it continues to develop.
- 4.2.10 A suggestion arising from undertaking the Equality Analysis Quality Assurance Checklist at the Regulation 18 stage was that the policy team consider consulting with or briefing other groups meeting during the consultation period on the Draft Local Plan, e.g. groups identified in the Council's Single Equality Framework such as Community Forums, Local Voices and other relevant local groups. As a consequence, the Council did undertake additional consultation at Regulation 18 stage. At the Regulation 19 stage, contact will be made with all groups contacted at the Regulation 18 stage.

Habitats Regulations Assessment

- 4.2.11 The HRA 'screening' undertaken has reviewed the available data and the draft plan and the results are presented in **Appendix I**. The initial assessment conclusion is that the plan, if delivered as per the draft, will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.

- 4.2.12 The assessment assessed the potential for the plan to affect five European sites within 15km of the LBTH area: Epping Forest SAC, Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA and Lee Valley Ramsar. It is considered that the plan is unlikely to have any measureable effects on sites beyond this due to the absence of reasonable impact pathways.
- 4.2.13 With regard to the sites considered, Richmond Park SAC and Wimbledon Common SAC were considered to be unaffected due to the distances and absence of impact pathways.
- 4.2.14 Epping Forest SAC, Lee Valley SPA and Lee Valley Ramsar have features that are potentially sensitive to the outcomes of the plan, particularly via visitor pressure or reduced air quality which are aspects that are known to be currently affecting Epping Forest SAC in particular. It is considered that these sites will have only limited exposure to these effects as a result of the plan, although it is appropriate for the plan to minimise the residual risk and suggested amendments to policies/supporting text may be required. A recommended change in relation to Policy D.ES2 'Air Quality' was previously put forward to ensure that project level air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area. The supporting text to the Local Plan has been amended as recommended.
- 4.2.15 A potential issue in relation to recreational pressure was highlighted in the HRA and the supporting text to Policy D.ES3 has been amended to highlight the potential need for consideration of impacts in relation to this issue at the project level.
- 4.2.16 Although the risk to European sites is low due to existing controls and distances from receptors, it is suggested that the following clause in D.SG4 "*Consider the impact of construction on the water supply, flood risk and drainage and implement suitable mitigation measures where required*" be modified to reflect the need for public utility capacity to be confirmed available before development proceeds. The Borough Council has indicated that it considers this to be an overly burdensome demand – given responsibility rests both with the utility provider and developer.
- 4.2.17 These suggestions/amendments will be explored with Natural England through consultation on the Draft Local Plan and this report.

Compliance with the NPPF

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

Monitoring

- 4.2.19 The Regulation 19 Local Plan includes proposals for monitoring which is welcomed. The proposed indicators have been compared against the SA objectives and a potential gap has been identified in relation to SA objective 16 'Contaminated Land' and the related SEA topic of soils.

Recommendations

- 4.2.20 A set of recommendations have been provided and are set out in **Table 3.10**. A number of recommendations made earlier in the process have been incorporated in the Draft Local Plan.

4.3 Next Steps

- 4.3.1 This IIA Report is being issued for consultation alongside the Draft Local Plan. The consultation will run from 2nd October to 13th November (5pm) 2017.

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

4.4 How to Comment on this Report

- 4.4.1 This IIA Report has been issued for consultation alongside the Draft Local Plan from **2nd October to 13th November (5pm) 2017**. Details of how to respond to the consultation are provided below.

This Consultation: How to Give Us Your Views

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

Please provide your comments by 5pm on 13th November. Comments should be sent to:

By email: localplan@towerhamlets.gov.uk

By post:

FREEPOST

Local Plan Consultation

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4.5 Quality Assurance

- 4.5.1 This SA Report has been prepared in accordance with the requirements of the SEA Directive and associated Regulations. A Quality Assurance Checklist is presented at **Appendix B**.

