

LD8

London Legacy Development  
Corporation

**Integrated Impact Assessment  
of the LLDC Local Plan**

IIA Report

REP/248753/2017-0020

Issue | 2 November 2018

This report takes into account the particular  
instructions and requirements of our client.

It is not intended for and should not be relied  
upon by any third party and no responsibility  
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# 1 Introduction

## 1.1 London Legacy Development Corporation (LLDC)

The LLDC is a Mayoral Development Corporation in east London and the local planning authority for the area. In 2012 the LLDC Planning Functions Order came into force giving the LLDC the full range of planning functions that would normally be available to a local planning authority, including plan making powers. The purpose of the Legacy Corporation is:

“to promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”<sup>1</sup>.

The area (‘the Legacy Corporation planning boundary’) encompasses parts of the London Boroughs of Hackney, Newham, Waltham Forest and Tower Hamlets (Figure 1).

The LLDC is responsible, with its partners, for the management of and development within the transformed Queen Elizabeth Olympic Park (QEOP), including the post 2012 Olympic Games sports venues and parklands. This includes the delivery by 2030 of new neighbourhoods such as Chobham Manor, East Wick, Sweetwater, Pudding Mill and Rick Roberts Way. It is also working with its partners to deliver a new cultural and education district with a new University College London (UCL) East campus and a new home for the University of Arts London College of Fashion, accompanied by a new museum and performance space.

The QEOP has already become a major visitor destination. It includes over 35 kilometres of interlinking pathways, waterways and cycle paths and approximately 45 hectares of biodiverse wildlife habitat on the Olympic Park, including reedbeds, grasslands, ponds and woodlands, with 525 bird boxes and 150 bat boxes. Other projects in the wider LLDC area that will support regeneration include Hackney Wick Central, which supports the development of a new neighbourhood centre and transformation of Hackney Wick Station.

The Local Plan reflects the LLDC’s vision and strategy for the area as a whole and provides the policy framework that will help to shape change and development that meets these goals.

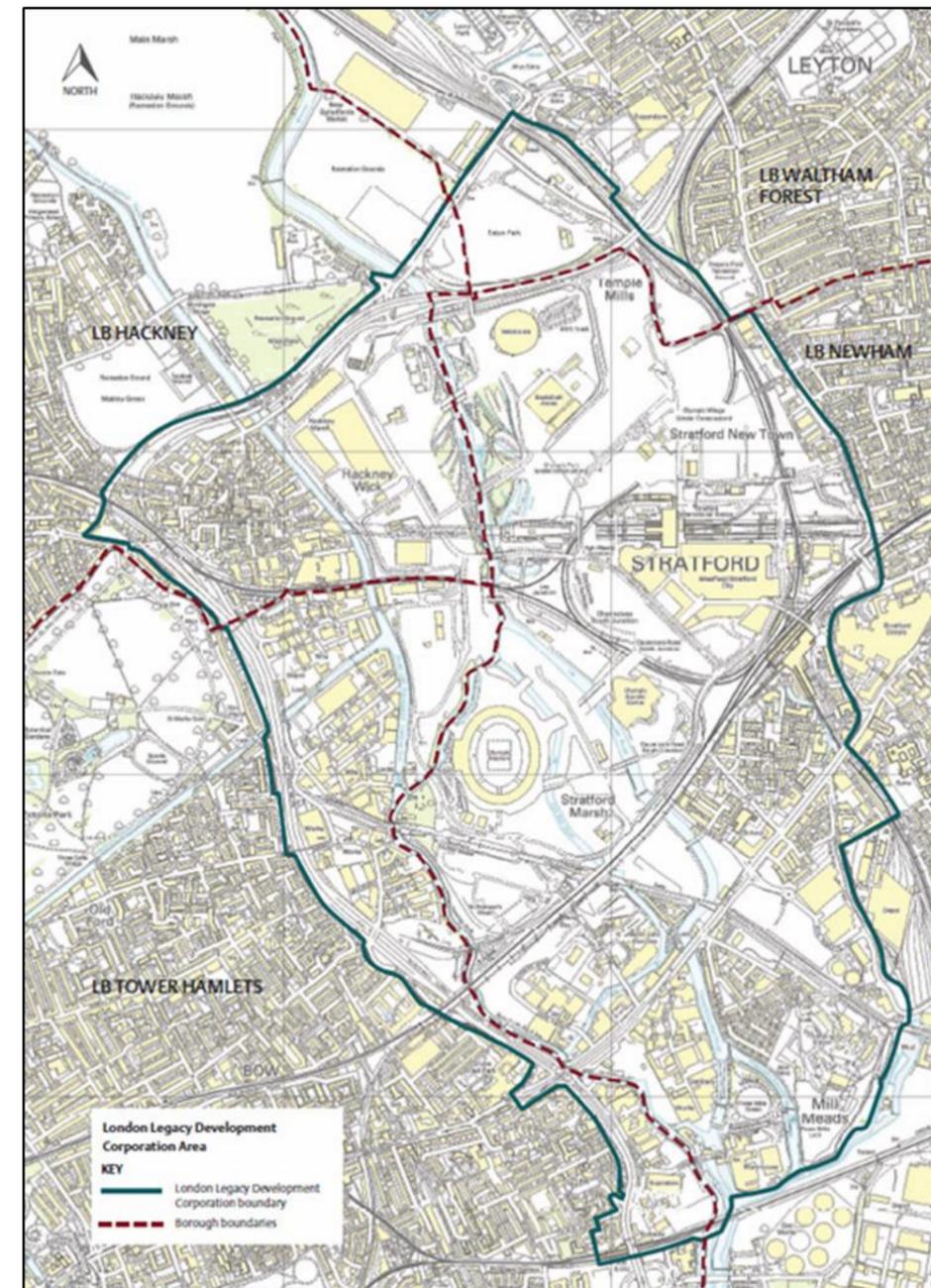


Figure 1: The LLDC Planning Area

<sup>1</sup>LLDC Sustainability guide to the Queen Elizabeth Olympic Park 2030  
[http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/lldc\\_your\\_sustainability\\_guide\\_to\\_the\\_queen\\_elizabeth\\_olympic\\_park2030.pdf](http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/lldc_your_sustainability_guide_to_the_queen_elizabeth_olympic_park2030.pdf)

## 1.2 Integrated impact assessment (IIA)

The IIA process follows the stages of the Strategic Environmental Assessment (SEA) methodology outlined in the Environmental Assessment of Plans and Programmes Regulations (EAPP) 2004.

SEA guidance informs and structures the IIA components, drawing together the assessment streams to present a common and fully integrated assessment of the policies. The assessments forming the IIA of the LLDC Local Plan are:

- Strategic Environmental Assessment;
- Equality Impact Assessment;
- Health Impact Assessment; and
- Community Safety Impact Assessment.

Drawing these together within an IIA contributes to a more balanced and inclusive assessment and better-informed strategic LLDC Local Plan. The following sections provide an overview of the individual requirements and methodologies for each of these assessments.

In addition to meeting the requirements of the IIA assessment, a Habitat Regulation Assessment (HRA) has also been prepared in compliance with the European Habitats Directive (enacted by Conservation (Natural Habitats and c) Regulations 1994 (“the Habitats Regulations”). This assessment is required to consider whether there is likely to be any significant effects of the new Local Plan on all European protected sites. This assessment has considered the HRA implications for each policy. The appropriate assessment undertaken in accordance with the Habitat Regulations is presented in Appendix C.

### 1.2.1 Strategic Environmental Assessment (SEA)

The SEA Directive<sup>2</sup> requires the assessment of the likely significant environmental effects arising from a plan or programme. This requirement has been implemented into domestic legislation in England and Wales through the EAPP 2004.

SEA allows the Local Plan to be tested as a whole and its individual objectives and policies against defined environmental topics, to identify significant effects. The SEA, as part of the IIA, assesses the environmental effects of the strategic options and states the reasons for selecting the preferred options. Where significant adverse effects are predicted, the SEA also identifies the measures required to mitigate them and the indicators that will be used to monitor them once the Local Plan is adopted.

### 1.2.2 Equality Impact Assessment (EqIA)

The purpose of an Equality Impact Assessment (EqIA) is to enable equality issues to be considered as part of the decision-making process. It systematically identifies and assesses the potential effects arising from the design and implementation of a proposed plan, policy or project for people sharing one or more protected

characteristics. The Equality Act (2010) imposes a duty on public bodies to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This means having regard to the need to:
  - remove or minimise disadvantages suffered by people who share a protected characteristic that are connected to that characteristic;
  - take steps to meet the needs of people who share a protected characteristic that are different from the needs of people who don't have that characteristic; and
  - encourage people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low;
- foster good relations between different people who share a relevant protected characteristic and persons who do not share it. This means having regard to the need to tackle prejudice and promote understanding<sup>3</sup>.

The EqIA is in line with Section 149(1) of The Equality Act (2010) which states that a public authority must have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Equality Act identifies the following as “protected characteristics”:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Although low-income groups are not identified within the ‘Protected Characteristics’ under the Equality Act (2010), they have been included as part of this assessment because low-income and deprivation typically overlap with other protected characteristics and are relevant to achieving inclusive growth. Similarly, working

<sup>2</sup> The SEA Directive (Directive 2001/42/EC) <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>3</sup> The Equality Act 2010 (2010/1736) <https://www.legislation.gov.uk/ukpga/2010/15/contents>

patterns have been included within the identified equalities groups, to ensure that adequate consideration is made for residents undertaking shift work, including night shifts. This type of working can disproportionately be undertaken by low income communities and forms part of the wider equalities assessment.

In line with the statutory requirements of the Equality Act, the IIA has given due regard to the need to remove or minimise disadvantages, discourage discriminatory practices and proactively accommodate the needs of equalities groups. This has been carried out by identifying sensitive receptors, who may be disproportionately impacted as a result of policy implementation, along with recommending how policies could be strengthened to promote equitable opportunities. Key guide questions will serve to assess the multiple dimensions of inequality, disadvantage and discrimination, and ensure Policies are promoting inclusive, accessible and equitable opportunities across higher risk groups.

EqlA is a two-stage process:

- Stage 1, Screening: the impacts of the proposed new policies are assessed against a defined set of protected characteristics. If negative effects are identified a full EqlA is undertaken (Stage 2 below).
- Stage 2, full EqlA: this includes an in-depth assessment of the impacts of any policies on the defined set of protected characteristics, the recommendation of mitigation measures, significance of effects assessed following the recommended mitigation where appropriate, definition of monitoring and evaluation measures and public consultation.

### 1.2.3 Health impact assessment (HIA)

There is currently no statutory guidance for undertaking an HIA. The scope, approach and methodology are informed by non-statutory guidance and best practice, stakeholder interests and site or project or plan-specific issues.

The aim of HIA is to ensure that plans and policies minimise negative impacts and maximise positive health impacts. The approach to the health element of the IIA has been based on appropriate guidance and health assessment tools, including:

- The London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Matrix<sup>4</sup>. This sets out a framework for evaluating projects, plans and policies under 11 broad topic or determinant headings;
- The HUDU Healthy Urban Planning Checklist<sup>5</sup> which provides a checklist designed so wellbeing implications of local plans and major planning applications are taken into account. It includes four themes: health and housing, active travel, healthy environment and vibrant neighbourhoods;
- Department of Health and Social Care's Health Impact Assessment Tools<sup>6</sup>. This includes the following screening questions to assist in considering potential health effects:

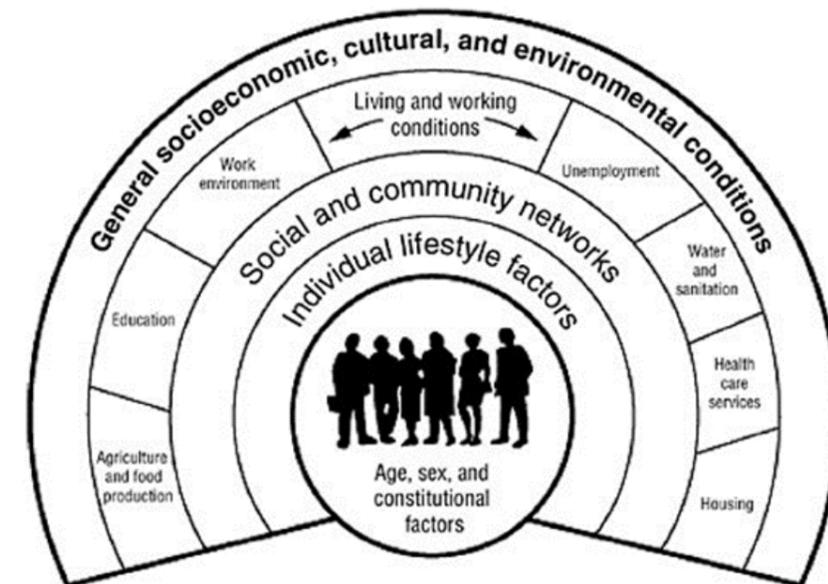
<sup>4</sup> Healthy Urban Development Unit (HUDU), NHS. <https://www.healthyurbandevelopment.nhs.uk/>

<sup>5</sup> HUDU Planning checklist, NHS. <https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2014/04/Healthy-Urban-Planning-Checklist-March-2014.pdf>

- Will the proposal have an impact on health, mental health and wellbeing?
- Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?
- Will the proposal affect an individual's ability to improve their own health and wellbeing?
- Will there be a change in demand for, or access to, health and social care services?
- Will the proposal have an impact on global health (either directly or indirectly)?

The Dahlgren and Whitehead model (Figure 2) illustrates the determinants of health, ranging from individual characteristics and lifestyles to wider economic, cultural, social and environmental conditions.

Figure 2: Dahlgren and Whitehead social model of health (1991)



### 1.2.4 Community safety impact assessment

The Crime and Disorder Act 1998 (as amended) and Police and Justice Act 2006 place a duty on the Mayor to consider community safety.

During the scoping stage, crime and disorder aspects were identified, including:

- baseline crime and nuisance statistics, with which impacts associated with options and policies can be assessed;

<sup>6</sup> Department of Health and Social Care, 2010. Health Impact Assessment Tools. <https://www.gov.uk/government/publications/health-impact-assessment-tools>

- the types of crime associated with the overarching strategies including environment, infrastructure, housing, and transport in London; and
- developing the crime and disorder aspects of the IIA objectives.

### 1.3 Structure of the IIA Report

The legal requirements for IIA are stipulated by Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA); Section 149 of the Equalities Act 2010 (EqIA); and the Crime and Disorder Act 1998 (CSIA). Table 1 sets out the particular requirements from each of these legislative requirements and how they are met within the IIA report.

Table 1: Legal requirements

Requirements of the SEA Regulations (Schedule 2)	Relevant section of this IIA Report
(a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes (article 5)	Section 4 and Appendix A
(b) The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or programmes;	Section 5
(c) The environmental characteristics of areas likely to be significantly affected	Section 6
(d) Existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Section 5
(e)The environmental protection objectives, established at international, community or member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 5
(f)The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 8
(g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 8
(h) An outline of the reasons for selecting alternatives dealt with and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Section 8 and Appendix D
(i) A description of the measures envisaged concerning monitoring	Section 8
(j) A non-technical summary of the information provided under the above headings	NTS precedes report
Requirements of the Equalities Act 2010 (Part II, Ch1, Section 149)	Relevant section of this IIA Report
(1) A public authority must, in the exercise of its functions, have due regard to the need to— (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;	Section 4 Appendix A Section 8

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (3) 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— (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) 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; (c) 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.	
Requirements of the Crime and Disorder Act 1998 (as amended) (Section 17)	Relevant section of this IIA Report
Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, (a)crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b)the misuse of drugs, alcohol and other substances in its area; and (c)re-offending in its area	Section 4 Appendix A Section 8

The remainder of this IIA report is as follows:

#### Chapter 2 The IIA assessment methodology and approach

A description of the methodology used for the IIA and how the assessment has been undertaken.

#### Chapter 4 Context review

A presentation of the plans, programmes and strategies reviewed to provide context for the IIA. The detailed review of these is contained in Appendix A.

#### Chapter 5 Baseline information

A description of the current environmental, economic and social baseline of the LLDC area.

#### Chapter 6 Key sustainability issues

A summary of the key sustainability issues identified from the context review and baseline information that should be addressed by the LLDC Local Plan and should be considered as part of IIA objectives

## **Chapter 7 IIA Framework**

A presentation of the objectives and key supporting questions used for the IIA, including how they have been developed.

## **Chapter 8 Assessment of the LLDC Local Plan**

A presentation of the assessment of individual draft policies, including an assessment of the likely effects of the policies and how the IIA has influenced the development of the Plan.

## **Chapter 9 Next Steps**

A brief explanation of the next stages of the IIA process

## 2 Approach to IIA Stages of the IIA process

The IIA Report provides an assessment of the draft LLDC Local Plan and its contribution towards achieving a range of environmental, economic, health, equality, crime and safety, and other objectives. The approach adopted in the IIA process follows the stages of SEA, identified in the IIA flow diagram. This approach has been expanded to include a wider range of issues normally found within Sustainability Appraisal (SA) (including SEA requirements), in addition to those relevant to HIA, EqIA and CSIA.

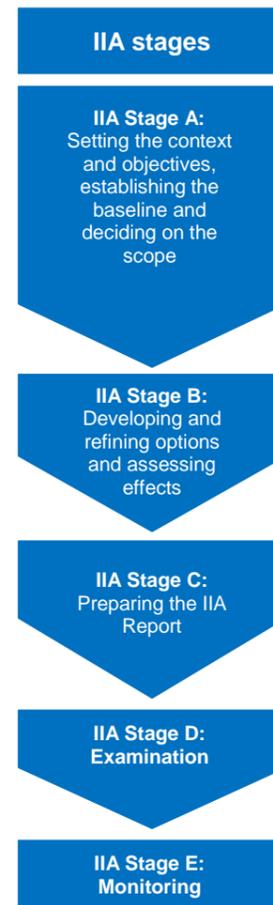
### 2.1.1 Stage A: Scoping stage

Scoping was undertaken in late 2017. It involved collating information on the economic, social and environmental aspects of the LLDC Planning Area (see Figure 1), identifying and reviewing the plans, programmes and strategies that will influence the Local Plan. This stage highlighted the main sustainability issues and to help develop sustainability objectives to allow the likely significant effects of the Plan to be assessed.

The scoping report was issued to the statutory consultation bodies indicated within the SEA Regulations (Historic England, the Environment Agency and Natural England). Stakeholder responses have been incorporated into the assessment, outlined in Table 2.

Table 2: Summary of stakeholder consultation

Summary of comment	How this has been addressed
<b>Emphasise that developments should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and the obligations of the Water Framework Directive (WFD).</b>	Objective 18 covers water targets and obligations across London and references the Water Framework Directive.
<b>Make reference to building resilience to biodiversity and wildlife through opportunities provided through development</b>	Objective 20 covers aspects of biodiversity and wildlife. The key guiding questions promote conserving, enhancing and creating habitats and enhancing the ecological function within London.
<b>Make reference to improving prosperity in East London.</b>	Growth of businesses in East London is part of the key guiding questions in Objective 10.
<b>Provide a clear and accessible document.</b>	A non-technical summary will be published.



### 2.1.2 Stage B: Developing and refining options and assessing effects

Prior to undertaking the IIA, a screening exercise was undertaken to assess the proposed changes to the revised LLDC Local Plan. This identified new policies or significant changes to existing policies which required reassessment. This screening exercise is summarised in Appendix B.

An IIA was then undertaken for all policies which were new or, that through amendments, may result in significant environmental effects. The policy options were also appraised following the same format. The IIA objectives and assessment criteria (see Section 7) were used to assess the effects. Where the assessment identified significant adverse effects, measures were identified that could be implemented to avoid or reduce this magnitude. The proposed mitigations included refinement or rejection of particular policy options and were integrated into the second draft of the revised Local Plan policies.

### 2.1.3 Stage C: Preparing the IIA Report

This IIA report summarises how the assessment was undertaken and findings from it. The purpose of the IIA report is to provide sufficient environmental, economic and social information to the LLDC to inform decision making on the adoption of policies. This report is structured against the requirements set out in Table 1: Legal requirements.

### 2.1.4 Stages D and E: Further stages

The IIA and preferred policies will be subject to consultation under Stage D of the IIA process. If, following consultation on the publication version of the LLDC Local Plan, changes are required that have not been subject to an IIA, then further IIA work will be carried out. If this is necessary, then the IIA Report will be updated and consulted on at the same time as the updated Local Plan. A final IIA Report will be produced alongside the LLDC Local Plan at publication stage.

Once the LLDC Local Plan has been formally published, an IIA Post-Adoption statement will be prepared that addresses the requirements of Stage E of the IIA process. The purpose of the IIA is to demonstrate how:

- Environmental, social and economic considerations have been taken into account as part of developing the Plan;
- The findings of the IIA report have been taken into account;
- How the opinions expressed by consultees have been taken into account;
- The reasons why the preferred options of the Plan were taken forward and why reasonable alternatives were discounted; and
- The proposed indicative monitoring regime which will be used to monitor the effects of implementing policies in terms of achieving the IIA objectives.

## 2.2 IIA Scope

### 2.2.1 Policy scope

The IIA has only assessed those options that provide a different intervention from the policies included in the current LLDC Local Plan. Therefore, options that continue with the current policy have not been assessed, as any assessment was considered unlikely to be significantly different from previous assessment.

### 2.2.2 Temporal scope

The effects of Local Plan policies may change during the short term (first five years of the implementation), medium term (years six to 11) and long term (beyond 11 years) periods. The effects of policies against these different timeframes have therefore been assessed independently.

### 2.2.3 Geographic scope

The LLDC Planning Area falls across the boundaries of the four London boroughs. Within the Local Plan, some policies are categorised into four sub-areas across the LLDC Planning Area. These four areas are:

1. Hackney Wick and Fish Island
2. North Stratford and Eton Manor
3. Central Stratford and Southern Queen Elizabeth Olympic Park
4. Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads.

## 2.3 How the IIA influenced the LLDC Local Plan

The IIA process has actively influenced the development of the revised Local Plan to ensure the options and policies successfully addresses key social, environmental and economic issues, and ultimately contribute to sustainability.

## 3 The LLDC Local Plan

### 3.1 Context

The LLDC Local Plan was adopted in July 2015 and is the statutory Development Plan for the LLDC Planning Area. It sets the strategy for growth within the Planning Area until 2031 and sets our specific policies that will shape and determine development in the area. It also identifies site allocations for development.

The LLDC Planning Area is experiencing rapid change. The population has grown significantly since 2012 and businesses opportunities are on the rise in areas such as Here East in Hackney Wick and the International Quarter London in Stratford. Therefore a review of the Plan has been undertaken to ensure it is still relevant. The review allows new evidence and data to be used to understand key issues in the area, which the Plan can address. It will also ensure growth assumptions in the Plan are still relevant and the Plan conforms to the key policy areas identified in the New London Plan<sup>7</sup>.

### 3.2 Revised Local Plan

The structure of the revised Local Plan is set out below.

#### Section 3 – Our Vision – what we want to achieve

- SD.1: Sustainable development

#### Section 4: Developing business growth, jobs, higher education and training

- SP.1: Building a strong and diverse economy
- B.1: Location and maintenance of employment uses
- B.2: Thriving town, neighbourhood and local centres
- B.3: Creating vitality through interim uses
- B.4: Providing low-cost business space, affordable and managed workspace
- B.6: Higher education, research and development

#### Section 5: Providing Housing and Neighbourhoods

- SP.2: Maximising housing and infrastructure provision within new neighbourhoods
- H.1: Providing for and diversifying the housing mix
- H.2: Delivering affordable housing
- H.3: Meeting accommodation needs of older persons households
- H.4: Providing student accommodation
- H.5: Location of gypsy and traveller accommodation

- H.7: Shared living accommodation
- H.8: Innovative housing models
- CI.1: Providing new and retaining existing community infrastructure
- CI.2: Planning for and bringing forward new schools

#### Section 6: Creating a high quality natural and built environment

- Policy SP.3 Integrating the natural, built and historic environment
- Policy BN.1: Responding to place
- Policy BN.2: Creating distinctive waterway environments
- Policy BN.3: Maximising biodiversity
- Policy BN.4: Designing development
- Policy BN.5: Proposals for tall buildings
- Policy BN.6: Requiring inclusive design
- Policy BN.7: Protecting Metropolitan Open Land
- Policy BN.8: Improving Local Open Space
- Policy BN.9: Maximising opportunities for play
- Policy BN.10: Protecting key views
- Policy BN.11: Air Quality
- Policy BN.12: Noise
- Policy BN.13: Protecting archaeological interest
- Policy BN.14 Improving the quality of land
- Policy BN.15: Designing residential extensions
- Policy BN.16: Designing advertisements
- Policy BN.17: Conserving or enhancing heritage assets

#### Section 7 – Securing the transport infrastructure to support growth

- SP.4: Planning for and securing transport and utility infrastructure to support growth and convergence
- T.1: Strategic transport improvements
- T.2: Transport improvements
- T.3: Supporting transport schemes
- T.4: Managing development and its transport impacts to promote sustainable transport choices, facilitate local connectivity and prioritise pedestrians and cyclists

<sup>7</sup> Draft London Plan (2017). Available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan>

- T.5: Street network
- T.6: Facilitating local connectivity
- T.7: Transport Assessments and Travel Plans
- T.8: Parking and parking standards in new development
- T.9: Providing for pedestrians and cyclists
- T.10: Using the waterways for transport

### **Section 8 – Creating a sustainable place to live and work**

- SP.5: A sustainable and healthy place to live and work
- S.1: Health and wellbeing
- S.2: Energy in new development
- S.3: Energy infrastructure and heat networks
- S.4: Sustainable design and construction
- S.5: Water supply and waste water disposal
- S6: Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure
- S.7: Planning for waste
- S.8: Waste reduction
- S.9: Overheating and urban greening
- S.10: Flood risk
- S.11 Sustainable drainage measures and flood protections
- Policy S.12 Resilience, safety and security

### **Section 10: Sub area 1 – Hackney Wick and Fish Island**

- Policy 1.1: Managing change in Hackney Wick and Fish Island
- Policy 1.2 Promoting Hackney Wick and Fish Island's unique identity
- Policy 1.3: Connecting Hackney Wick and Fish Island
- Policy 1.4: Preserving or enhancing heritage assets in Hackney Wick and Fish Island
- Policy 1.5: Improving the public and private realm in Hackney Wick and Fish Island
- Policy 1.6: Building to an appropriate height in Hackney Wick and Fish Island
- SA1.1 Hackney Wick Station Area
- SA1.2 Hamlet Industrial Estate
- SA1.3: Hepscott Road
- SA1.4: Neptune Wharf
- SA1.5: East Wick and Here East

- SA1.6: Sweetwater
- SA1.7: Bartrip Street South
- Section 11: Sub area 2 – North Stratford and Eton Manor
- Policy 2.1 – Housing typologies
- Policy 2.2: Leyton Road – improving public realm
- Policy 2.3 – Local Centre and non-residential uses
- SA2.1: Chobham farm
- SA2.2: East Village
- SA2.3: Chobham Manor

### **Section 12: Sub Area 3 – Central and Southern Queen Elizabeth Olympic Park**

- Policy 3.1: Stratford Metropolitan Centre
- Policy 3.2: Stratford High Street Policy Area
- Policy 3.3: Improving connections around central Stratford
- SA3.1: Stratford Town Centre West
- SA3.2: Stratford Waterfront East
- SA3.3: Stratford Waterfront West
- SA3.4: Greater Carpenters District
- SA3.5: Bridgewater Road
- SA3.6: Rick Roberts Way

### **Section 13 – Sub Area 4 Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads**

- 4.1: A potential District Centre
- 4.2: Bringing forward new connections to serve new development
- 4.3: Station Improvements
- SA4.1: Bromley-by-Bow
- SA4.2: Sugar House Lane
- SA4.3: Pudding Mill
- SA4.4: Three Mills
- SA4.5: Bow Goods Yards (Bow East and West)

## 4 Review of plans, programmes, strategies and objectives

### 4.1 Introduction

The LLDC Local Plan and the IIA were influenced by many different plans and programmes. This is in accordance with the SEA Directive which requires the review of relevant plans and programmes to be completed:

*‘the plan’s relationship with other relevant plans and programmes’ and ‘the environmental protection objectives, established at international, (European) Community or national level, which are relevant to the plan...and the way those objectives and any environmental considerations have been taken into account during its preparation’. Directive 2001/42/EC SEA Annex 1 (a), (e)*

The first stage of completing the IIA was to review relevant international, national, regional and local policy guidance, plans and strategies. This ensures that:

- the LLDC Local Plan and IIA framework are in line with the requirements of other relevant plans and policies;
- that inconsistencies or constraints are suitably dealt with;
- sustainability objectives, key targets and indicators are reflected in the IIA; and,
- relevant baseline data is accounted for.

### 4.2 Document review

The relevant plans, policies and programmes that were reviewed are summarised in Table 3. The identification of relevant plans, policies and programmes is an ongoing process and the list will continue to be updated in any subsequent IIA reports. A full context review is located in Appendix A. New documents that have been published since the publication of the LLDC Local Plan Scoping Report are highlighted in red.

Table 3: Summary of relevant plans and programmes that inform the IIA process

<b>Document title</b>
<b>International context</b>
Report of the World Summit on Sustainable Development (2002)
Renewed EU Sustainable Development Strategy (2006)
EU Seventh Environmental Action Plan 2013-2020
European Spatial Development Perspective (ESDP) (1999)
The Aarhus Convention (1997)
UN Framework Convention on Climate Change (1992)
Paris Agreement (2015)
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
Second European Climate Change Programme (ECCP II) (2005)
EU Directive on ambient air quality and cleaner air for Europe (2008)
The Water Framework Directive (2000)
Drinking Water Directive (1998)
Groundwater Directive (2006)
The blueprint to safeguard Europe's water resources (2012)

Directive on the assessment and management of flood risks (2007)
UN Convention on Biological Diversity (1993)
Bern Convention on the conservation of migratory species of wild animals (1979)
Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979)
EU Birds Directive (2009)
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (1992)
Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)
The EU Biodiversity Strategy to 2020 (2011)
European Landscape Convention (2000)
Basic Texts of the 1972 World Heritage Convention (2005)
Waste Framework Directive (2008/98/EC)
Energy efficiency directive (2012)
<b>National context</b>
UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)
Planning Act (2008)
Environmental Quality in Spatial Planning, including Supplementary Files (2005)
World Class Places: The Government's Strategy for Improving Quality of Place (2009)
Green Infrastructure and the Urban Fringe: Learning lessons from the Countryside In and Around Towns programme (2007)
The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)
Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)
Climate Change Act (2008)
Stern Review of the Economics of Climate Change (2006)
UK carbon plan (2011)
Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System (2009)
Planning for climate change - guidance for local authorities (2012)
Energy Act (2013)
Low carbon transport: a greener future - a carbon reduction strategy for transport (2009)
Wildlife and Countryside Act (1981) (as amended)
The Conservation of Habitats and Species Regulations (2010)
The Countryside and Rights of Way (CROW) Act (2000)
Natural Environment and Rural Communities Act (2006)
UK Post-2010 Biodiversity Framework (2012)
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
Biodiversity by Design: A Guide for Sustainable Communities (2004)
UK Biodiversity Indicators 2015, (2016)
Natural Environment White Paper: implementation updates
Making Space for Nature: A review of England's Wildlife Sites and Ecological Network (2010)
Geological Conservation Review Series (Ongoing)
Safeguarding our Soils: A Strategy for England (2009)
Green Infrastructure Guidance (2011)
Providing Accessible Natural Greenspace into towns and Cities
Planning (Listed Buildings and Conservation Areas) Act (1990)
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
Future Water: The Government's Water Strategy for England (2008)
Flood and Water Management Act (2010)
Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management in England (2005)
Waste Strategy for England (2007)
The Egan Review: Skills for Sustainable Communities (2004)

<b>Working for a Healthier Tomorrow (2008)</b>
<b>Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002 (2008)</b>
<b>National Planning Policy Framework March (2012)</b>
<b>Localism Act (2011)</b>
<b>National Planning Policy for Waste (2014)</b>
<b>Planning Policy Guidance Flood Risk and Coastal Change (March 2014)</b>
<b>Regional context</b>
<b>The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016)</b>
<b>The London Plan consolidated with alternations since 2011</b>
<b>The London Plan IIA Scoping Report (2017)</b>
<b>The London Plan IIA Report (2017)</b>
<b>City for all Londoners (2016)</b>
<b>London Industrial Land Demand (2017)</b>
<b>London office policy review (2017)</b>
<b>The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016)</b>
<b>Planning Authority Monitoring Report (2016/17)</b>
<b>Older Londoners and The London Plan: Looking to 2050 (2016)</b>
<b>The Draft London Environment Strategy (2017)</b>
<b>London Housing Strategy. Draft for consultation (2017)</b>
<b>Housing in London 2017: The evidence base for the Mayor's Housing Strategy (2017)</b>
<b>City of London Air Quality Strategy 2015 - 2020 (2015)</b>
<b>Draft Mayor's Transport strategy (2017)</b>
<b>Mayor's Biodiversity Strategy Update: A Review of Progress and Priorities for Action (2015)</b>
<b>City of London Biodiversity Action Plan 2016 - 2020 (2016)</b>
<b>The Mayor's Economic Development Strategy for London (2010)</b>
<b>Souder City: The Mayor's Ambient Noise Strategy (2004)</b>
<b>Securing London's Water Future: The Mayors Water Strategy (2011)</b>
<b>Sustainable Design and Construction: The London Plan Supplementary Planning Guidance (2014)</b>
<b>Affordable housing and viability Supplementary Planning Guidance (2017)</b>
<b>Housing Supplementary Planning Guidance (2016)</b>
<b>Social infrastructure Supplementary Planning Guidance (2015)</b>
<b>Accessible London Supplementary Planning Guidance (2014)</b>
<b>Town Centres Supplementary Planning Guidance (2014)</b>
<b>Character and context Supplementary Planning Guidance (2014)</b>
<b>Trees and woodlands Supplementary Planning Guidance (2012)</b>
<b>Land for industry and transport Supplementary Planning Guidance (2012)</b>
<b>Play and informal recreation Supplementary Planning Guidance</b>
<b>Olympic Legacy Supplementary Planning Guidance (2012)</b>
<b>All London's Green Grid Supplementary Planning Guidance (2012)</b>
<b>Planning for equality and inclusion (2017)</b>
<b>Joint Waste Development Plan for the East London Waste Authority Boroughs (2012)</b>
<b>North London: Strategic Flood Risk Assessment (2008)</b>
<b>London's Natural Signatures: The London Landscape Framework (2011)</b>
<b>Green Infrastructure and Open Environments: The All London Green Grid SPG (2012) and The All London Green Grid Lea Valley &amp; Finchley Ridge Area Framework (2012)</b>
<b>Part 1: Thames River Basin District River Basin Management Plan (2015) and Part 2: River Basin Management Planning Overview and Additional Information (2015)</b>
<b>Thames Estuary 2100 (TE2100) 5 Year Monitoring Review (2016)</b>
<b>Thames Catchment Flood Management Plan: Managing Flood Risk (2009)</b>
<b>Transport for London Report 5 (2012)</b>
<b>Mayor of London and Growth Borough Strategic Regeneration Framework (2009)</b>
<b>Local context</b>
<b>Hackney Joint Health and Wellbeing strategy 2015-2018 (2015)</b>

<b>Hackney's Core Strategy 2010-2025 (2010)</b>
<b>Hackney Strategic Housing Market Assessment (2014)</b>
<b>Hackney health profile (2016)</b>
<b>Hackney Homelessness Strategy 2015-2018 (2015)</b>
<b>Hackney Housing Strategy 2010-2015 (2012 update)</b>
<b>LB of Hackney Level 2 Strategic Flood Risk Assessment (2010)</b>
<b>London Borough of Hackney, Statement of Community Involvement (2014)</b>
<b>Hackney Biodiversity Action Plan 2012-2017 (2012)</b>
<b>Hackney Surface Water Management Plan Final Draft (2013)</b>
<b>Tower Hamlets Core Strategy 2025 (2010)</b>
<b>Tower Hamlets Partnership Community Plan (2015)</b>
<b>Tower Hamlets Health and Wellbeing Strategy: Towards a healthier Tower Hamlets 2017-2020 (2017)</b>
<b>Tower Hamlets Health Profile (2016)</b>
<b>Tower Hamlets Community Safety Partnership Plan 2013-2016 (2013)</b>
<b>Tower Hamlets Strategic Housing Market Assessment (2014)</b>
<b>Tower Hamlets Joint Strategic Needs Assessment (2015)</b>
<b>Tower Hamlets Draft 2016-2021 Homelessness Strategy outline (2016)</b>
<b>Tower Hamlets Housing Strategy 2016-2021 (2016)</b>
<b>Tower Hamlets Level 2 Strategic Flood Risk Assessment (2012)</b>
<b>Tower Hamlets Statement of Community Involvement (2012)</b>
<b>Tower Hamlets Local Biodiversity Action Plan 2015-19 (2015)</b>
<b>Tower Hamlets Surface Water Management Plan (2016)</b>
<b>Tower Hamlets Conservation Strategy 2016-2026 (2016)</b>
<b>Newham 2027, Newham's Local Plan- The Core Strategy (2012)</b>
<b>Outer North East London Strategic Housing Market Assessment (2016)</b>
<b>Newham Joint Strategic Needs Assessment 2011-2012 (2011)</b>
<b>Newham Strategic Flood Risk Assessment (2010)</b>
<b>Newham Statement of Community Involvement (201)</b>
<b>Newham Biodiversity Action Plan (2010)</b>
<b>Sugar House Lane Conservation Area – Character Appraisal and Management Proposals (2010)</b>
<b>Three Mills Conservation Area: Character Appraisal and Management Proposals (2006)</b>
<b>Waltham Forest Local Plan Core Strategy (2012)</b>
<b>Waltham Forest Health Profile (2016)</b>
<b>Waltham Forest Safety Net Strategic Assessment (2010)</b>
<b>Waltham Forest Housing Needs Survey and Strategic Housing Market Assessment (2012)</b>
<b>Waltham Forest Council Homelessness Prevention Strategy 2013-18 (2013)</b>
<b>Waltham Forest Housing Strategy 2008-2028 (2008)</b>
<b>Statement of Community Involvement, Waltham Forest (2007)</b>
<b>Waltham Forest Biodiversity Action Plan 2010-2020 (2011)</b>
<b>Waltham Forest Local Implementation Plan 2011</b>
<b>Waltham Forest Council Level 2 Strategic Flood Risk Assessment (2011)</b>
<b>London Borough of Waltham Forest, Surface Water Management Plan (2011)</b>
<b>Legacy Communities Scheme: Revised Green Infrastructure Strategy (2012)</b>
<b>Legacy Communities Scheme: Biodiversity Action Plan 2014 - 2019 (2013)</b>
<b>LLDC Equality and inclusion policy (2012)</b>
<b>LLDC Socio-economic policy (2012)</b>
<b>LLDC Sport and healthy living policy (2012)</b>
<b>LLDC Community engagement policy (2012)</b>
<b>LLDC Statement of Community Involvement (2013)</b>
<b>LLDC Inclusive Design Strategy (2012)</b>
<b>LLDC Infrastructure Delivery Plan (2013)</b>
<b>Queen Elizabeth Olympic Park 2030 Sustainability guide</b>
<b>Fish Island Management Guidelines</b>
<b>Hackney Wick Management Guidelines</b>

## 5 Baseline

### 5.1 Scope and purpose of the baseline

The Environmental Assessment of Plans and Programmes Regulations 2004 require a discussion of the

‘...relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ (Annex 1 (b)). For IIA, the baseline and identification of key issues must also consider social and economic aspects in addition to the environmental issues specified in the SEA Directive.

Key issues derived from the baseline review are presented in Section 6.

The LLDC collated data relating to the LLDC Planning Area, reported in the LLDC Population report: Profile and Forecasts<sup>8</sup>. This data is not directly comparable with Census data as it is from another source, and the boundary of the Planning Area is not associated with Census geographical boundaries.

### 5.2 Population and Demographics

The population of the LLDC Planning Area in 2017 was approximately 26,000. Figure 3 shows the population projections until 2036. Between 2017 and 2036, it is projected that the population of the LLDC Planning Area will increase by 227.5%.

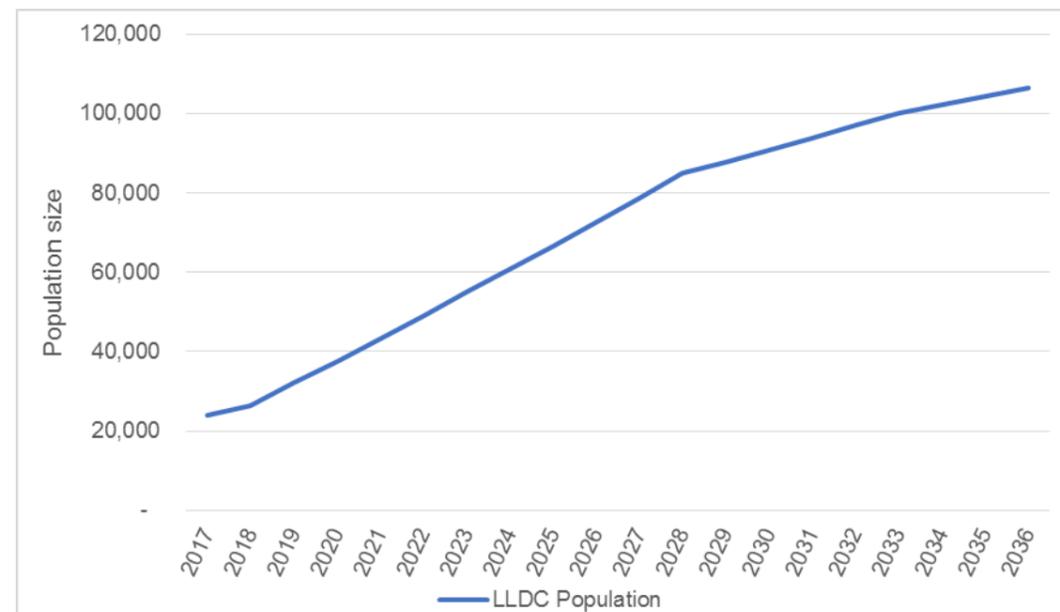


Figure 3: Population projection for the LLDC Planning Area 2017-2036

Figure 4 shows the relative proportions of age groups in the LLDC Planning Area and the population projections in five yearly intervals. This indicates that over time, it is

expected that elderly and young populations are expected to increase in the LLDC Planning Area.

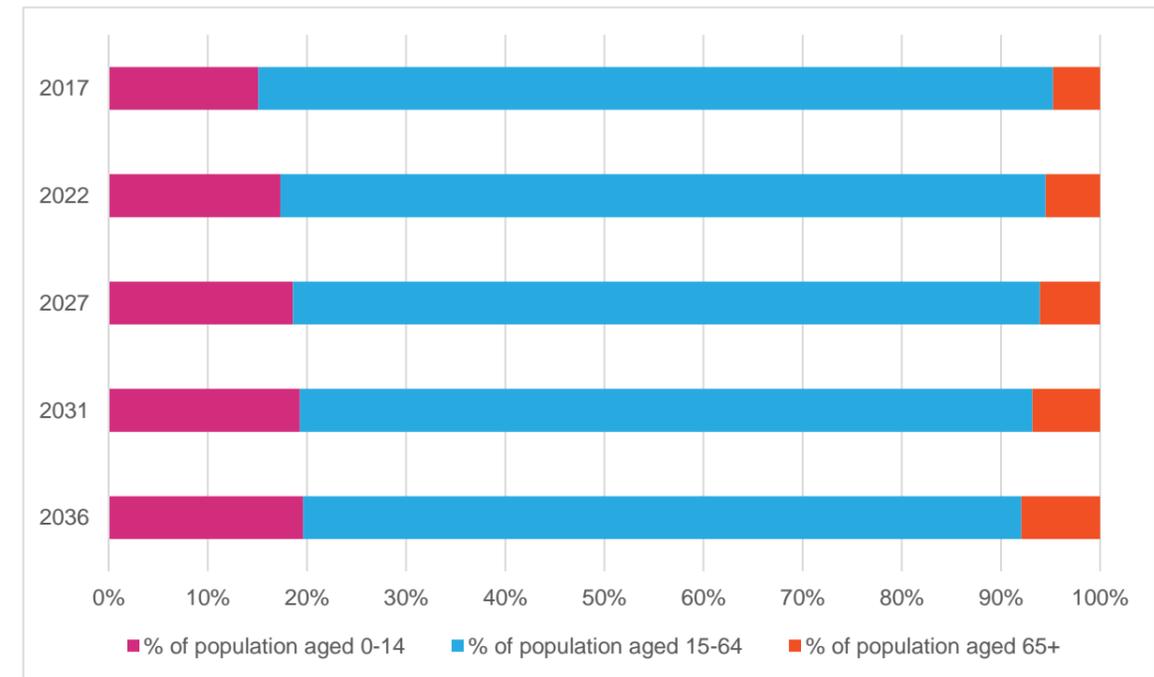


Figure 4: Population projections broken down by age

<sup>8</sup> LLDC Population Report: Profile and Forecast. March 2018. Available at: <http://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-review>

Figure 5 shows the breakdown of resident’s identified ethnic groups, with just over half in the LLDC Planning Area identifying as white.

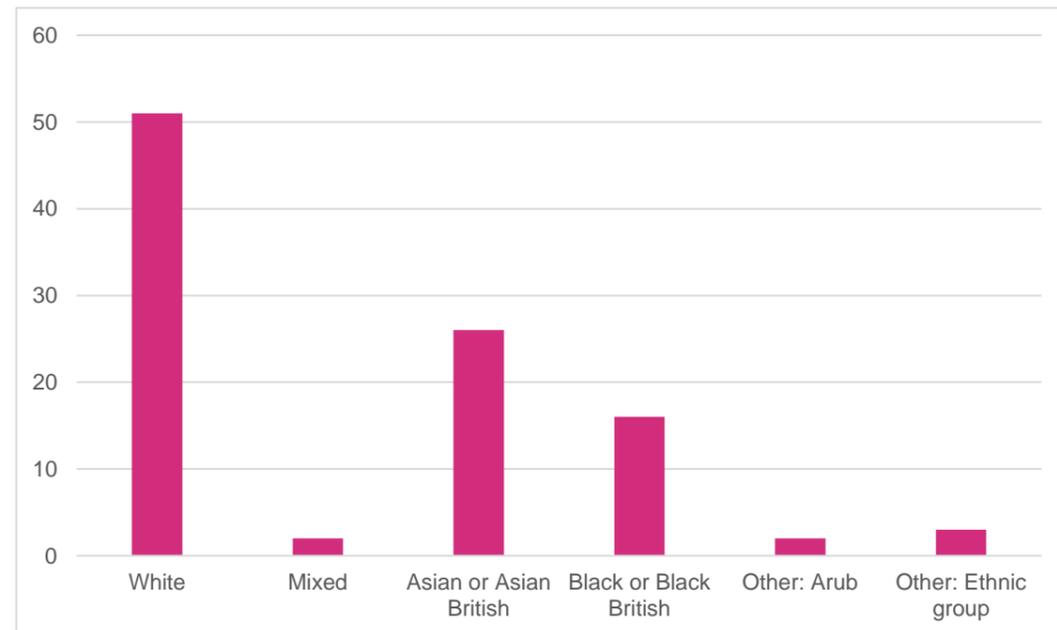


Figure 5: Ethnic groups

### 5.3 Housing and community

#### 5.3.1 Relocating to the LLDC Planning Area

Only 8% of residents had lived in the local area over 20 years, whereas 73% had lived there less than five years<sup>9</sup>. The main reasons for moving to the area were for the standard of accommodation (26%) or for work (21%). For those who have moved to the area within the last 12 months (23% of residents), 48% had moved from elsewhere in London and 15% from the same London borough.

Regarding those residents planning to move out of the LLDC Planning Area within the next 12 months, 13% that said they were planning to move. Of those, 19% were moving for work and 13% were moving as accommodation is too expensive.

#### 5.3.2 Housing type and ownership

The most common type of housing in the LLDC Planning Area is flat/apartments in a built block of flats, with 80% of residents living in this type of accommodation<sup>9</sup>. In

<sup>9</sup> LLDC Population Report: Profile and Forecast. March 2018. Available at: <http://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-review>

<sup>10</sup> London Borough of Hackney Homeless Strategy 2015-2018.

<https://www.hackney.gov.uk/media/7109/homelessness-strategy/pdf/homelessness->

<sup>11</sup> London Borough of Tower Hamlets Housing Strategy 2016-2021

[http://www.towerhamlets.gov.uk/Documents/Housing/TH\\_Housing\\_Strategy\\_document.pdf](http://www.towerhamlets.gov.uk/Documents/Housing/TH_Housing_Strategy_document.pdf)

terms of housing ownership, 53% of residents rent from private landlords, 18% rent from housing association or social landlords, and 8% own a home with a mortgage

#### 5.3.3 Homelessness and overcrowding

At a borough level, in Hackney in 2014/15, 1636 homeless applications were received, and in 2014 the council counted 12 rough sleepers<sup>10</sup>. In tower Hamlets in 2015/16, 522 applications were accepted as homeless and in 2015 the council counted 12 rough sleepers<sup>11</sup>. Waltham Forest also had high numbers of homeless households, with 1045 accepted applications in 2012/13<sup>12</sup> and 15 rough sleepers counted in autumn 2012. Of those recorded as homeless in Waltham Forest, 62% came from ethnic minority groups.

Overcrowding is also an issue in some boroughs, with 31.16% of households occupying overcrowded homes in Hackney<sup>4</sup>. In Newham 34.9% of households were classified as overcrowded in 2011, and 23.2% in Waltham Forest<sup>13</sup>.

#### 5.3.4 House prices

The average house price in 2016 for all boroughs was higher than the national average of £227,380. The average price for homes in Hackney was higher than the London average and Hackney has had the largest increase in house price between 2000 and 2016.

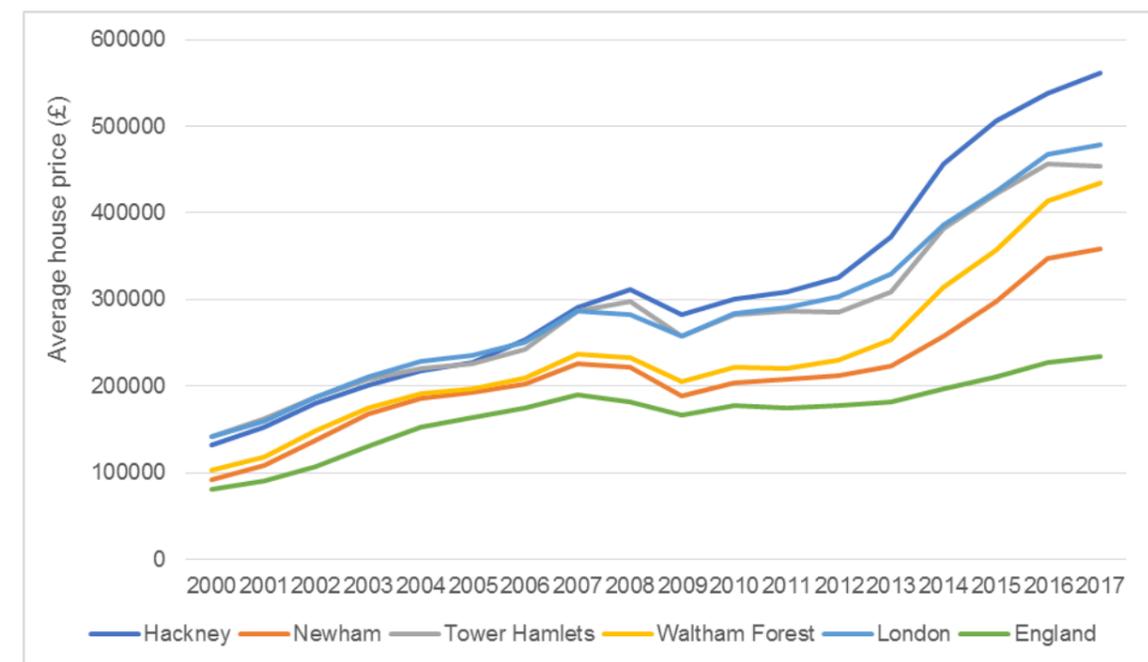


Figure 6: Average house prices

<sup>12</sup> London Borough of Waltham Forest Homelessness prevention strategy 2013-18.

<https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20homelessness%20strategy-2013-18.pdf>

<sup>13</sup> Outer North London Strategic Housing Market Assessment 2011-2033.

[https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamStrategicHousingMarketAssessment\[1\].pdf](https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamStrategicHousingMarketAssessment[1].pdf)

### 5.3.5 House price to earnings ratio

The ratio of house prices to earnings is a method of indicating housing affordability in an area. Ratios are calculated by dividing house price by the median earnings of a borough. Hackney had the highest ratio in 2016 at 16.53, above the national (2.61) and London (5.98) ratios<sup>22</sup>. Hackney also had the greatest increase in ratio between 2002 and 2016 (Figure 12).

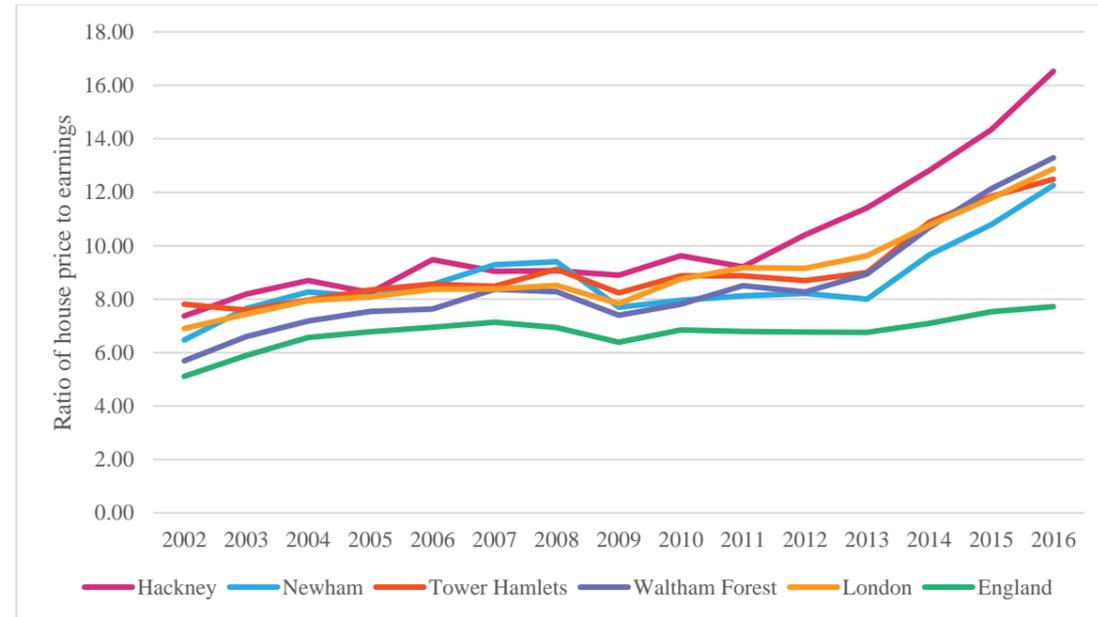


Figure 7: House price affordability

In Newham it is estimated that 51,800 homes are needed between 2011 and 2033, of which 22,200 need to be classified as affordable<sup>13</sup>. In Waltham Forest 15,900 homes are needed between 2010 and 2031 with a breakdown of 45.9% of socially rented, 35.8% intermediate affordable and 18.3% market homes<sup>6</sup>. The Tower Hamlets housing need was estimated at 2428 homes per annum between 2016 and 2021<sup>7</sup>.

### 5.3.6 Community

56% of residents have been found to be very satisfied with the LLDC area as a place to live and 60% were very satisfied with the local open spaces and parks<sup>14</sup>. Figure 8 also identifies the main reasons for using local open spaces and parks.

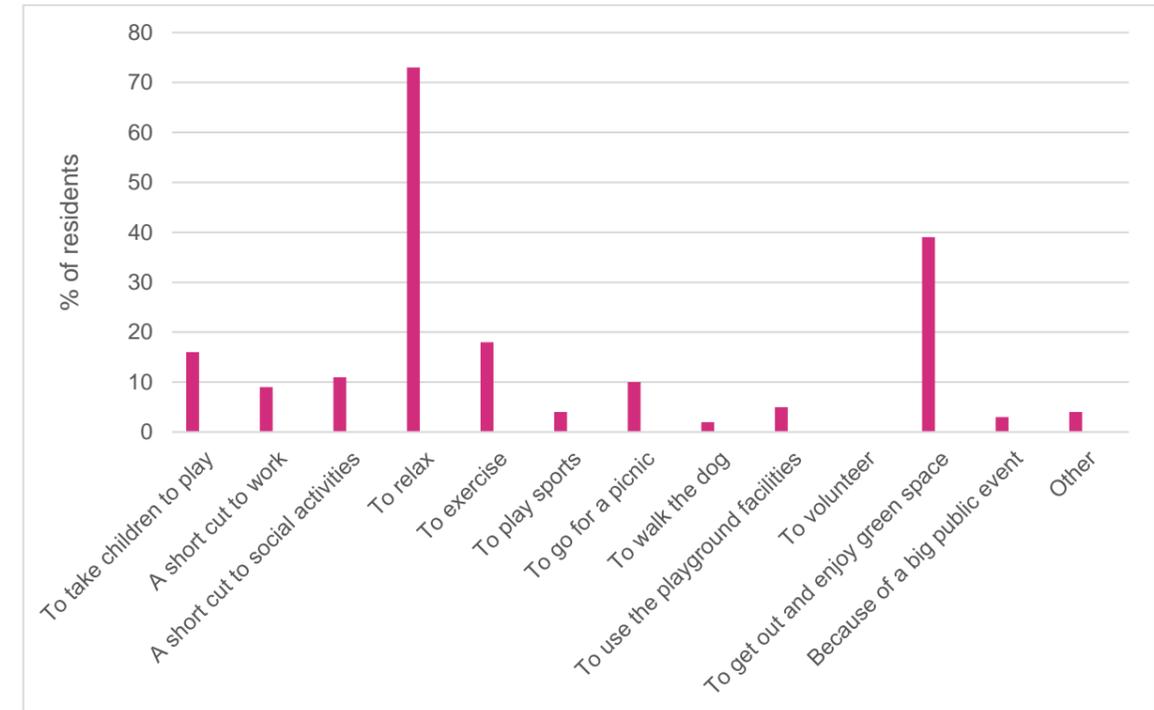


Figure 8: Reasons for visiting open spaces/parks in the LLDC area

## 5.4 Economy and employment

### 5.4.1 Key economic centres

Stratford is the key Metropolitan Centre in the area, alongside the Neighbourhood Centres at Hackney Wick and East Village Local Centre. New centres will also emerge through the Local Plan period, with Bromley-by-Bow forming a District Centre and a Local Centre at Pudding Mill.

Strategic Industrial Locations (SIL) sites are located at Here East Fish Island South and Bow Midland West Rail Site; and Bow Goods Yard East. Local Significant Industrial Sites (LSIS) are located at Conservancy Road, Trafalgar Mews, Chapman Road, Sugar House Lane, Temple Mills Lane, Rick Roberts Way and Bartrip Street North. Additionally, Other Industrial Land (OIL) sites are located at Cooks Road and Wick Lane/Crown Close<sup>15</sup>.

Figure 9 identifies where residents within the LLDC Planning Area shopped for a variety of goods, identifying Westfield Stratford City as the most popular location for most shopping<sup>16</sup>.

<sup>14</sup> LLDC Population Report: Profile and Forecast. March 2018. Available at: <http://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-review>

<sup>15</sup> LLDC Local Plan, 2015

<sup>16</sup> LLDC Population Report: Profile and Forecast. March 2018. Available at: <http://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-review>

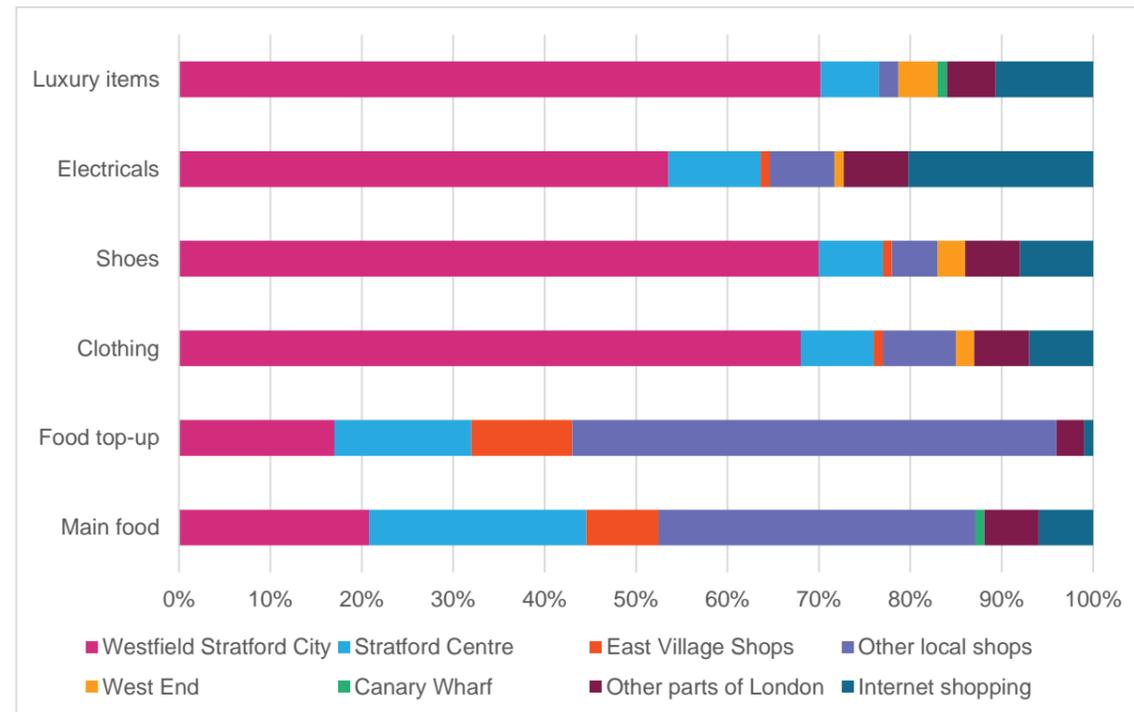


Figure 9: Main locations for purchasing goods

For leisure activities, such as restaurants, bars and cinemas, 50% of residents stated Westfield Stratford Centre was their main destination, followed by other parks of London (19%).

### 5.4.2 Economic status

Figure 10 shows the current economic status of residents in the LLDC area. Over half are in full time employment, but there is also a large student population.

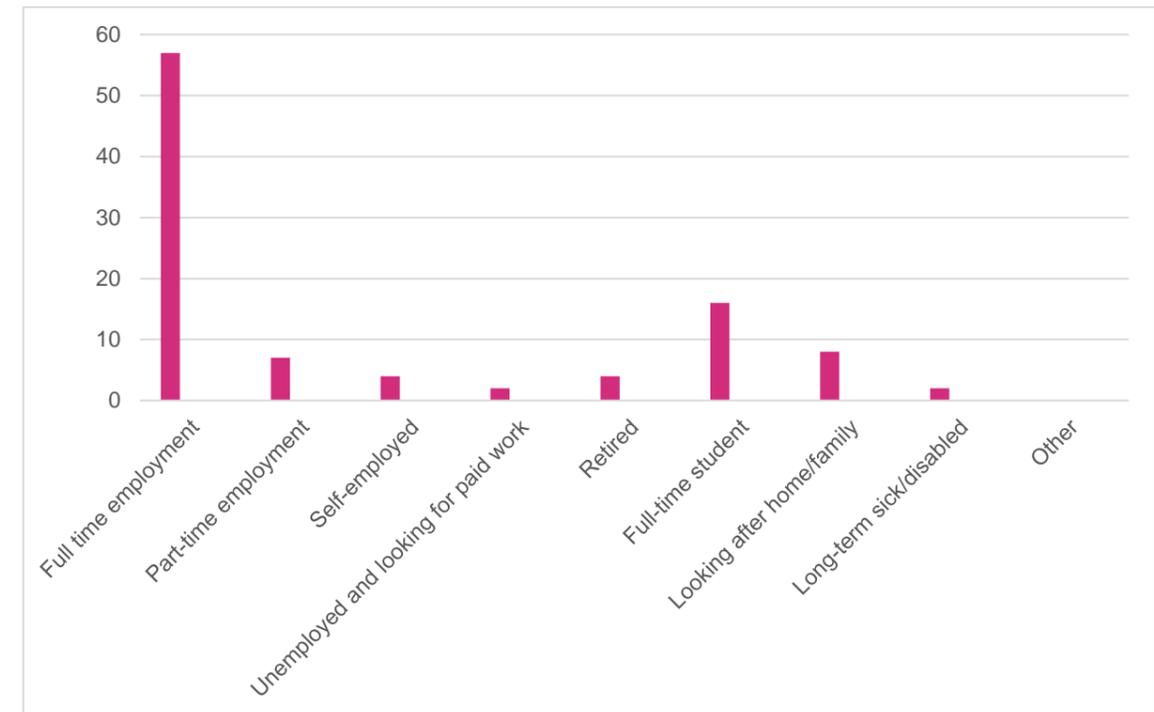


Figure 10: Economic status

Figure 11 shows the occupational groups residents in the LLDC Planning Area belong too, with the majority (49%) in professional occupations.

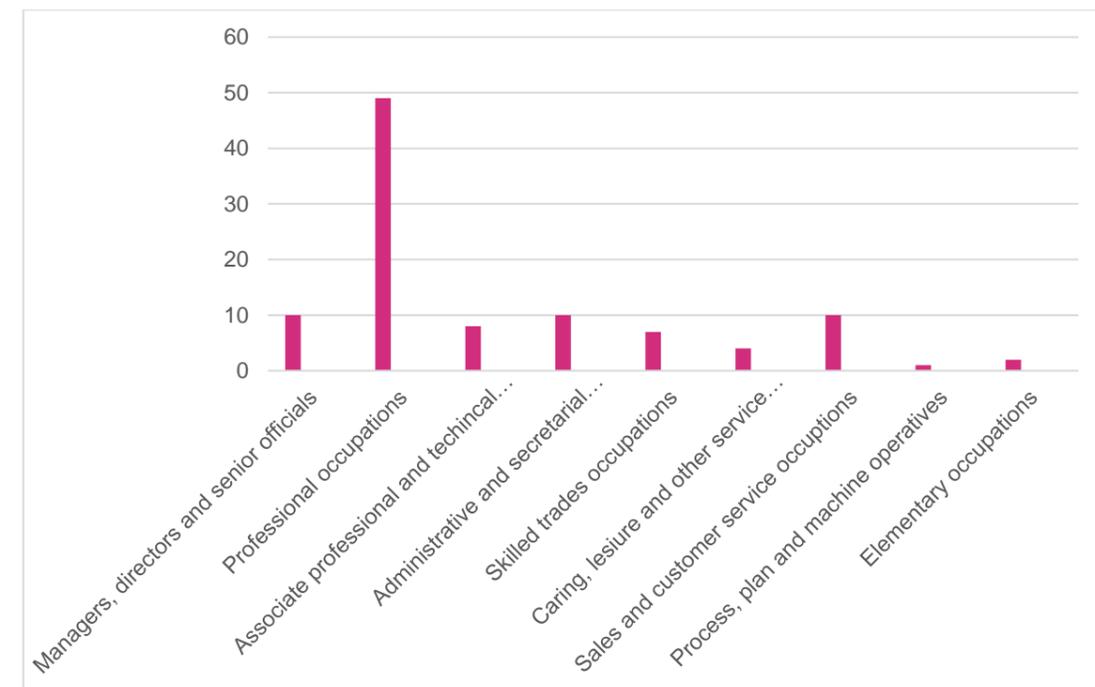


Figure 11: Occupational groups

The largest proportion of residents were found to be earning between £50,000 and £74,999 (Figure 12).

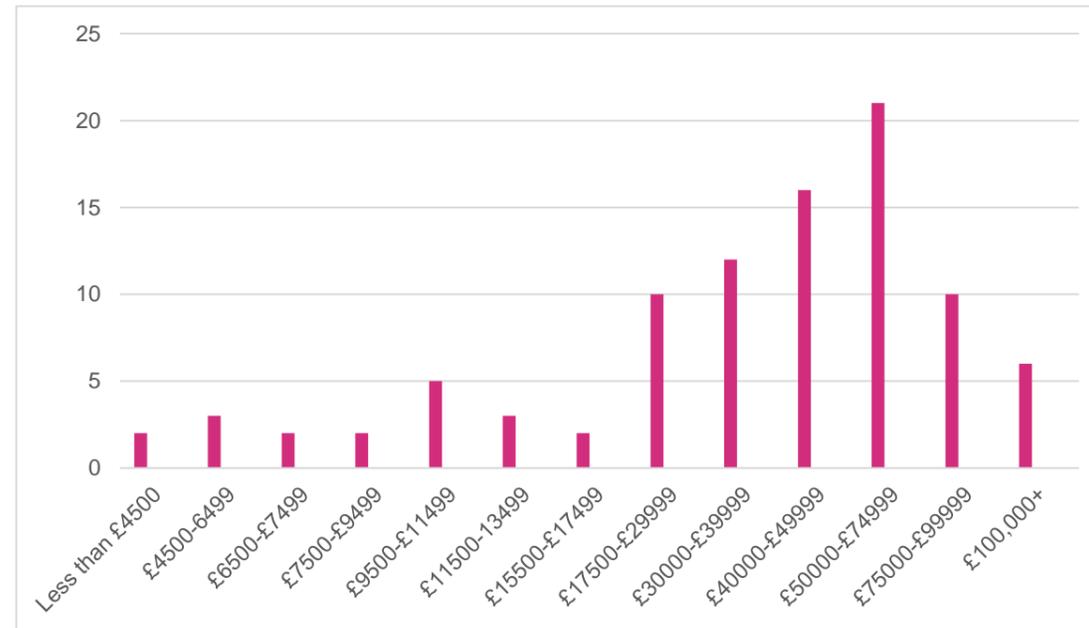


Figure 12: Annual pre-tax income

### 5.4.3 Gross Value Added (GVA)

Gross value added (GVA) measures an individual producer, industry, sector or region’s contribution to the economy. Tower Hamlets has a significantly larger GVA compared to the other three boroughs (Table 4)<sup>17</sup>, the third largest across London. This is predominantly due to key economic sites including Canary Wharf and the City Fringe. Waltham Forest had the smallest GVA. London’s total GVA was £364 billion in 2014

Table 4: Gross Value Added

Borough	GVA (£ million)
Hackney	£8216
Newham	£6340
Tower Hamlets	£27636
Waltham Forest	£4600

## 5.5 Health

### 5.5.1 Health risk factors

Adult smoking rates across all four boroughs are higher than the London average of 15.2% and national average of 15.5%<sup>18</sup>. Newham has the highest smoking rate with

22.3% of adults smoking. Tower Hamlets and Waltham Forest have significantly higher smoking related deaths, well above the London (260.4) and national (283.5) rates. Intower Hamlets 365 deaths in every 100,000 individuals aged 35 and over are smoking-related and in Hackney this rate was 326.3 deaths. The smoking status at time of delivery per 100 maternities is significantly lower than the national average across the boroughs. Tower Hamlets has a relatively low smoking delivery rate of 3.9%, whereas the other boroughs are similar to the London average of 5%.

The percentage of adults classified as overweight or obese is below the national average in all four boroughs (Table 5).

Table 5: Percentage of adults classified as overweight or obese

	% of adults classified as overweight or obese
Hackney	53.2%
Newham	63.2%
Tower Hamlets	52.5%
Waltham Forest	58.6%
London	58.8%
England	64.6%

In the LLDC Planning Area, 5% of residents stated they had a health problem or disability which limits their day-to-day activities<sup>19</sup>. When looking at specific age groups, 28% of those aged 65 and over were limited by health problems. Figure 13 shows the level of use at local sports facilities for physical activity and other forms of exercise.

<sup>17</sup> Greater London Authority, Regional gross value added estimates for London 1997-2014. [London.gov.uk/sites/default/files/borough-gva](http://london.gov.uk/sites/default/files/borough-gva)

<sup>18</sup> Public Health England, Health Profiles. [Fingertips.phe.org.uk](http://fingertips.phe.org.uk)

<sup>19</sup> LLDC Population Report: Profile and Forecast. March 2018. Available at: <http://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-review>

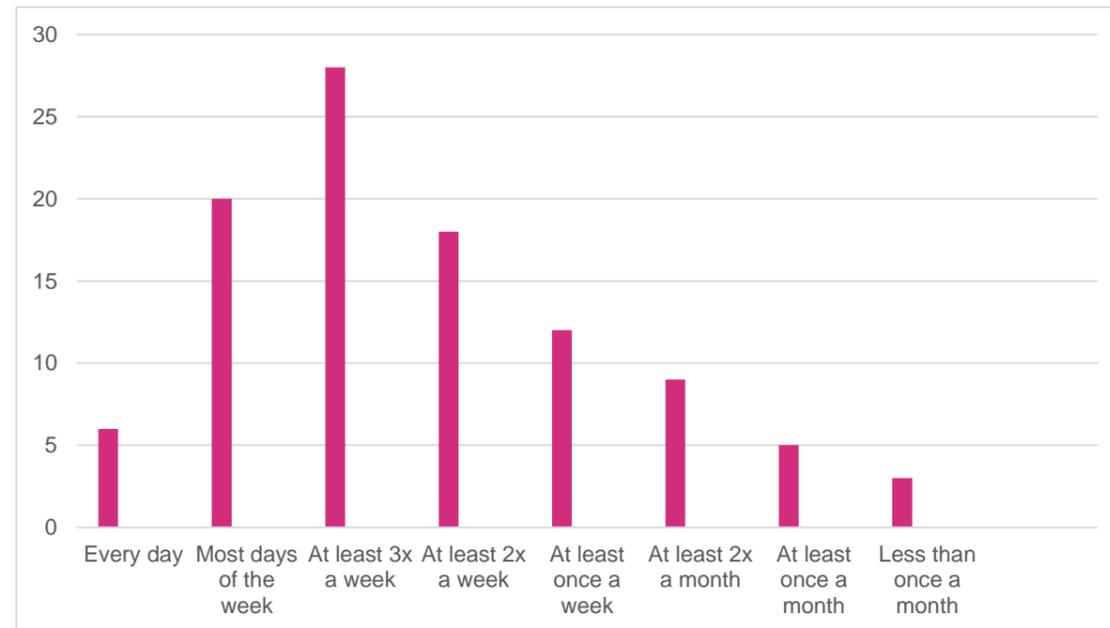


Figure 13: How often individuals use sports facilities for exercise

Obesity in children in year 6 is high across the four boroughs. All four boroughs have similar rates between 26% and 27.5% of children, compared with 19.8% nationally and 23.3% in London<sup>13</sup>.

All four boroughs have high rates of under 75 mortality rates related to cardiovascular health. 77.4 deaths per 100,000 in London and 74.6 deaths nationally are cardiovascular related. Newham and Hackney are particularly high with 108.8 and 105.8 deaths per 100,000 respectively. In terms of under 75 mortality rates related to cancers, most of the boroughs are in line with the London (129.7) or national (138.8) averages, with exception to Tower Hamlets which has a high rate of 150.9 deaths per 100,000.

Recorded diabetes cases are in line with national and regional averages, with exception to Newham, where 8% of individuals aged 17 or over have diabetes, compared with 6.1% in London<sup>18</sup> (Figure 14).

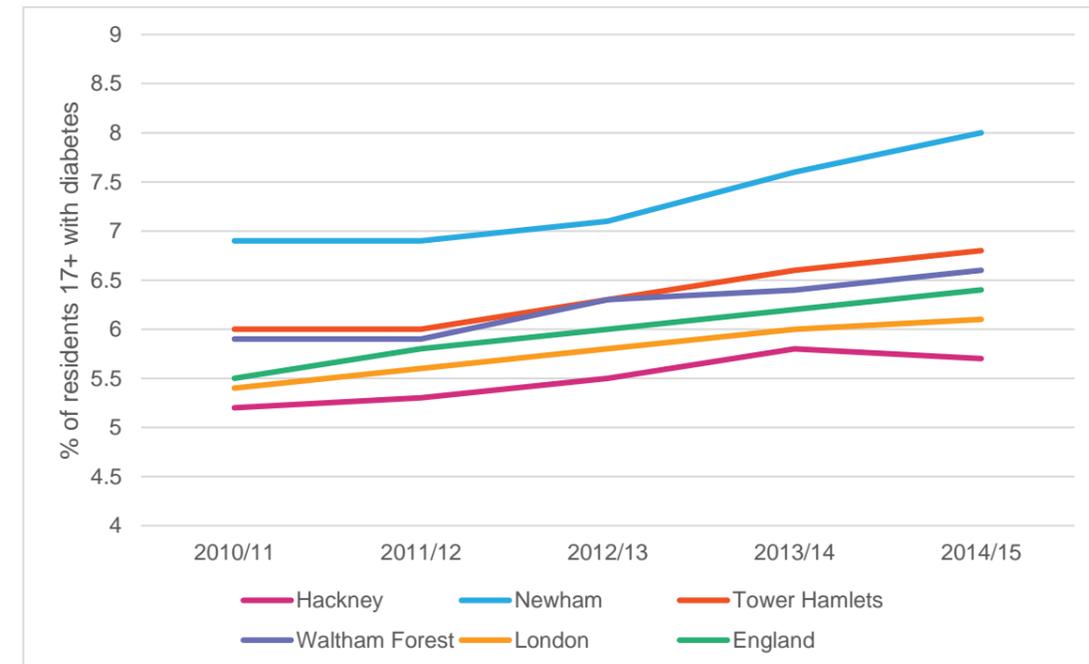


Figure 14: Percentage of residents over the age of 17 with diabetes

### 5.5.2 Fuel poverty

Fuel poverty is defined as spending over 10% of household income to maintain a satisfactory level of heating. Table 6 shows that Newham and Waltham Forest have particularly high level of households living in fuel poverty<sup>20</sup>.

Table 6: Fuel poverty statistics

	% of households considered fuel poor
<b>Newham</b>	15.7%
<b>Tower Hamlets</b>	10.6%
<b>Waltham Forest</b>	13.2%
<b>Hackney</b>	9.8%
<b>London</b>	10.1%
<b>England</b>	11.4%

### 5.5.3 Environmental factors

Environmental factors can have a significant effect on health. London has a number of large Air Quality Management Areas and it is recognised that poor air quality can have a significant detrimental effect on health.

<sup>20</sup> Department for Business, Energy and Industrial Strategy, Sub regional fuel poverty data 2017. <https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics>

## 5.6 Crime and Safety

The Place Survey 2008<sup>21</sup> provides information on people's perceptions of their local area and the local services they receive. Although relatively out of date, it still provides an insight into the concerns of residents within the four boroughs (Table 7).

Table 7: The Place Survey Statistics (2008)

Activities	Noisy neighbours or loud parties	Teenagers hanging around the streets	Rubbish or litter lying around	Vandalism, graffiti and other deliberate damage to property or vehicles	People using or dealing drugs	People being drunk or rowdy in public places	Abandoned or burnt out cars
Hackney	28%	56%	54%	45%	56%	42%	15%
Newham	29%	67%	70%	57%	61%	52%	31%
Tower Hamlets	31%	70%	59%	53%	61%	47%	20%
Waltham Forest	25%	58%	65%	51%	47%	39%	20%

Table 8 shows that in terms of hate crimes, race-related crimes are the most commonly reported across the four boroughs.

Table 8: Number of reported hate crimes (March 2016-March 2017)

	Race	Faith	Anti-Semitic	Islamophobia	Sexual Orientation	Disability	Trans-gender	Total
Hackney	721	161	109	43	115	25	16	1190
Newham	573	90	0	80	50	23	0	816
Tower Hamlets	786	118	17	86	122	33	10	1172
Waltham Forest	430	68	0	52	50	13	0	613
London	16164	2092	530	1260	2034	656	200	22936

## 5.7 Education

### 5.7.1 Qualifications

Across the four boroughs, the proportion of the population with no qualifications aged 16-64 is much higher than the London (6.6%) and England (7.8%) averages<sup>22</sup>. Newham had the highest level, as 9% of the working age population have no qualifications, closely followed by Tower Hamlets (8.6%) and Hackney (8.2%). Waltham Forest had the lowest level at 7.7%.

<sup>21</sup> Place Survey, 2008. DCLG. [www.communities.gov.uk/publications/corporate/statistics/placesurvey2008update](http://www.communities.gov.uk/publications/corporate/statistics/placesurvey2008update).

<sup>22</sup> ONS Census, 2011. Dataset: QS502EW- Highest level of qualification gained.

<sup>23</sup> ONS Census, 2011. Dataset: DC5102EW- Highest level of qualification by sex by age. Nomisweb.co.uk

However, each borough also has high proportions of residents with a degree level or equivalent and above, aged 16-64. Compared to the national (30.3%) and London (45.5%) average, Hackney and Tower Hamlets have large populations of degree level education, with 49.7% and 48.3% of residents respectively. Newham (38.6%) and Waltham Forest (38.5%) are below the London average, but still above national average.

There are smaller proportions of females with a degree or equivalent in Newham, Tower Hamlets and Waltham Forest, following similar trends in London. The difference between male and female is relatively small (<1%), excluding Tower Hamlets where 5% more males have degree level education than women<sup>23</sup>. In Hackney marginally more woman have higher education qualifications which reflects national trends.

Qualifications vary between ethnic groups<sup>24</sup>. Table 9 shows that in some regions, ethnic minorities make up a large proportion of residents without any qualifications, such as Asian/Asian British residents in Newham and Tower Hamlets.

Table 9: Highest level of qualification by ethnic group

	White	Mixed/ Multiple ethnic group	Asian/ Asian British	Black/ African/ African Caribbean/ Black British	Other
Hackney	55%	5%	13%	19%	8%
Newham	44%	3%	37%	13%	3%
Tower Hamlets	44%	2%	46%	7%	2%
Waltham Forest	65%	3%	18%	11%	4%
England	90%	1%	6%	2%	1%
London	69%	3%	16%	10%	3%

Within the LLDC Planning Area, a number of schools are present:

- Chobham Academy (All years)
- Bobby Moore Academy (Year 7 currently, to be all years)
- London Academy of Excellence (6th Form)
- East London Science School (Secondary)
- Gainsborough Primary School (Primary)
- Carpenters Primary School (Primary)
- Mossbourne Primary School (Primary)

Population growth is expected to continue between now and 2027. This will put pressure on a number of resources, including schools. Table 10 and Table 11

<sup>24</sup> ONS Census, 2011. Dataset: DC5202EW- Highest level of qualification by ethnic group by age. Nomisweb.co.uk

demonstrate the existing situation within the four boroughs regarding school pupils, additionally they forecast the number of pupils and the places required between 2011-2021.

Table 10 Primary school forecast

	Current number of primary school pupils	State funded primary school forecast 2020/2021 (no. of pupils)	% change 2011-2021	Additional number of school places required (forecast-current number of places)
Hackney	18,599	19,096	3%	0
Newham	32,496	38,337	18%	3,132
Tower Hamlets	22,974	24,653	7%	0
Waltham Forest	22,980	26,604	16%	714
London	676,189	749,639	11%	354
England	4,307,008	4,689,753	9%	0

Table 11 Secondary school forecast

	Current number secondary school students	State funded secondary school forecast 2020/2021 (no. of pupils)	% change 2011-2021	Additional number of school places required (forecast-current number of places)
Newham	21,564	27,883	29%	2,232
Tower Hamlets	16,595	21,069	27%	2,073
Waltham Forest	15,531	17,847	15%	596
Hackney	12,807	16,949	32%	1,982
London	487,654	587,791	21%	7,014
England	3,171,447	3,757,415	18%	0

## 5.8 Transport

In terms of commuting, residents in the LLDC Area predominantly took the tube (48%), 20% took the train, 10% walked and 8% cycled. Figure 15 identifies the usual length of resident's commute on a normal day. 91% of residents stated they were very satisfied or fairly satisfied with their commute. In terms of car or van ownership 73% of residents do not have any, 24% own one and only 3% own two or more vehicles.

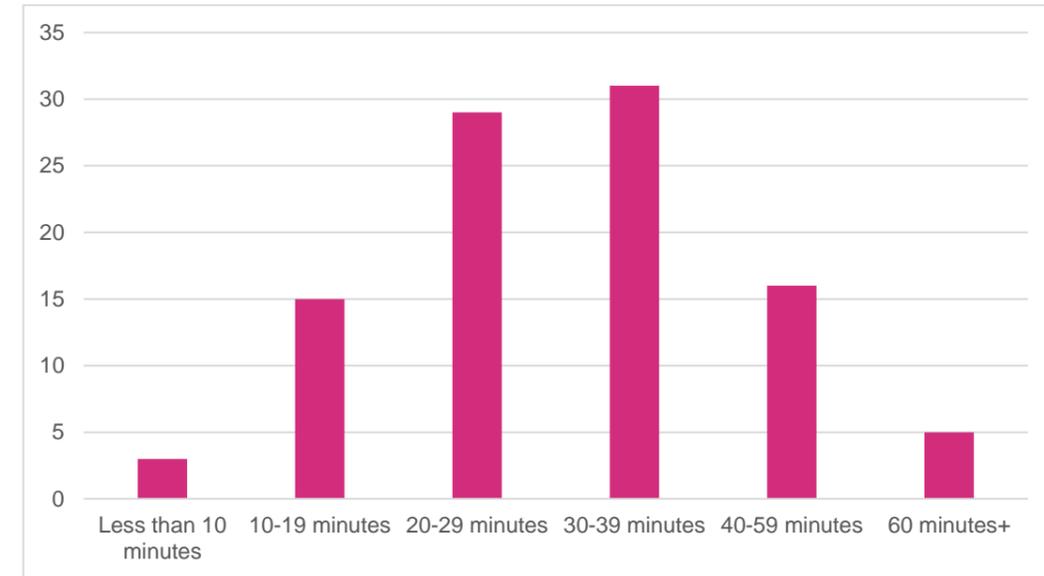


Figure 15: Average length of resident's commute

Transport in London is characterised by high levels of public transport use, rather than driving a car or van, which is the most popular type nationally. Figure 16 shows the key transport hubs within the LLDC Planning Area. Between the different transport methods used to travel to work, the underground was the most popular option in most boroughs except Hackney, where bus travel is the most popular (Figure 17).

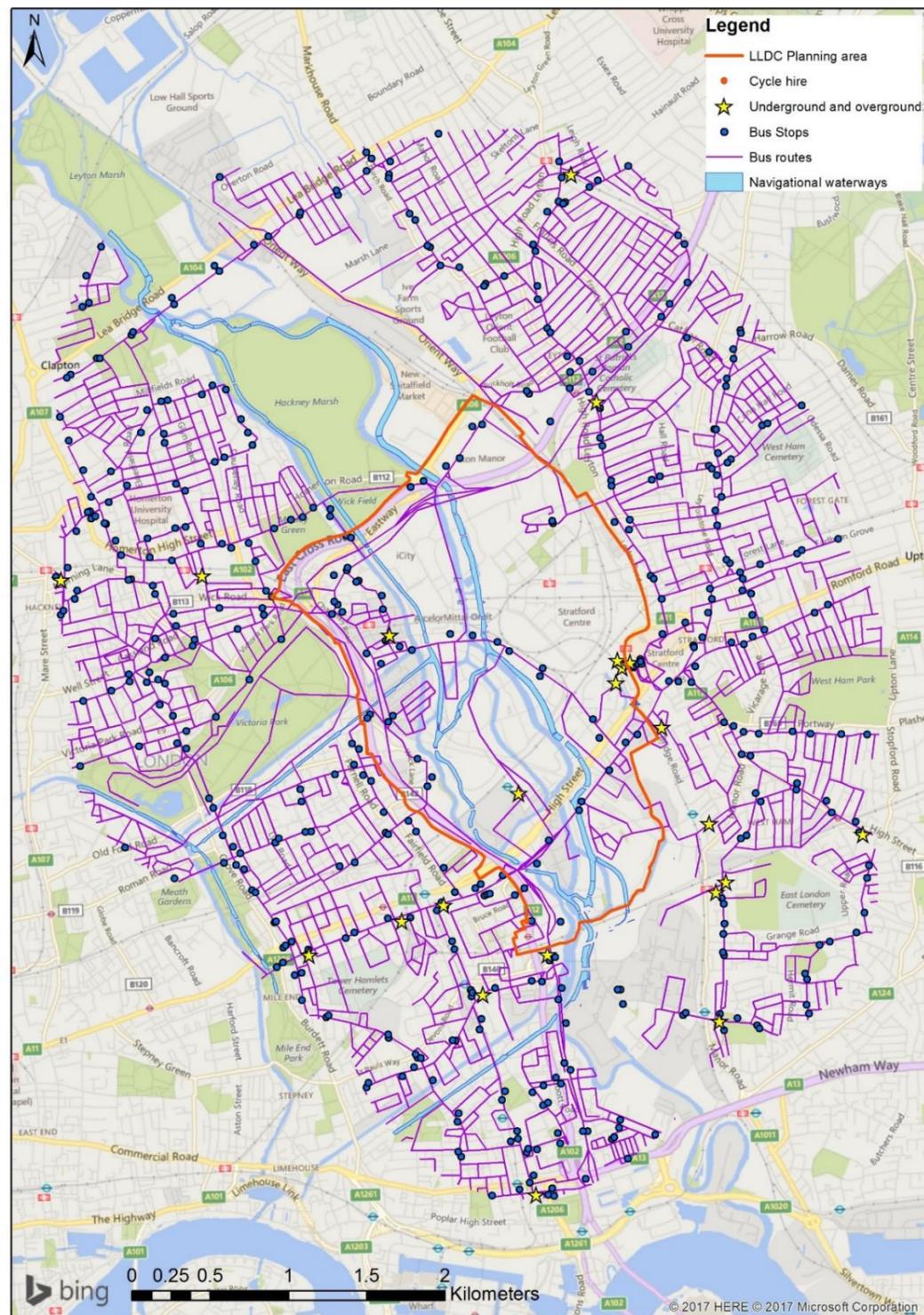


Figure 16: Key transport hubs within the LLDC area

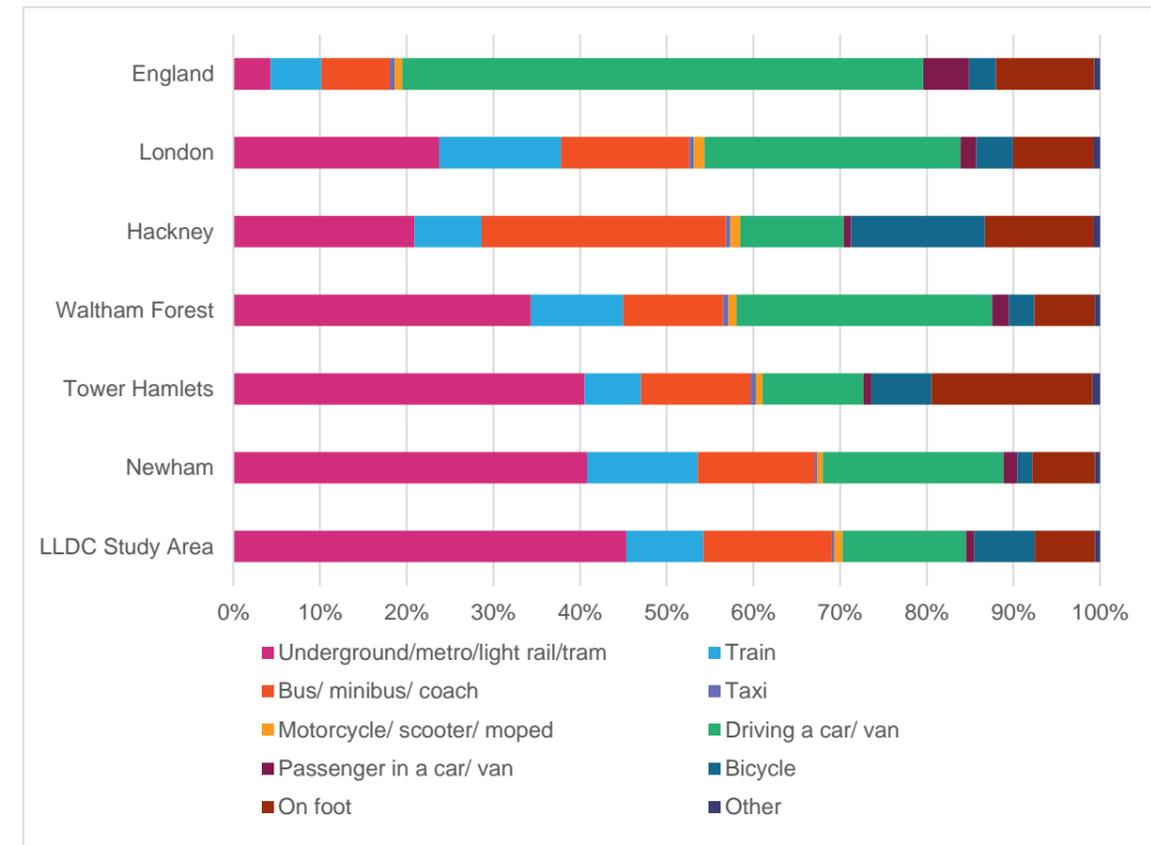


Figure 17: Methods used to travel to work

Public Transport Access Level (PTAL) is the most recognised way of measuring connectivity to the public transport network in London. The PTAL value combines information about how close public transport services are to a site and how frequent these services are. The highest level of connectivity has a PTAL of 6b and the lowest has a PTAL of 0.

Figure 18 shows the PTAL ratings across the LLDC Planning Area and wider area, showing high levels of access to the east, with lower levels to the northwest<sup>25</sup>.

<sup>25</sup> Transport for London, Public Transport Accessibility Level (PTAL) 2015. London Datastore-data.london.gov.uk

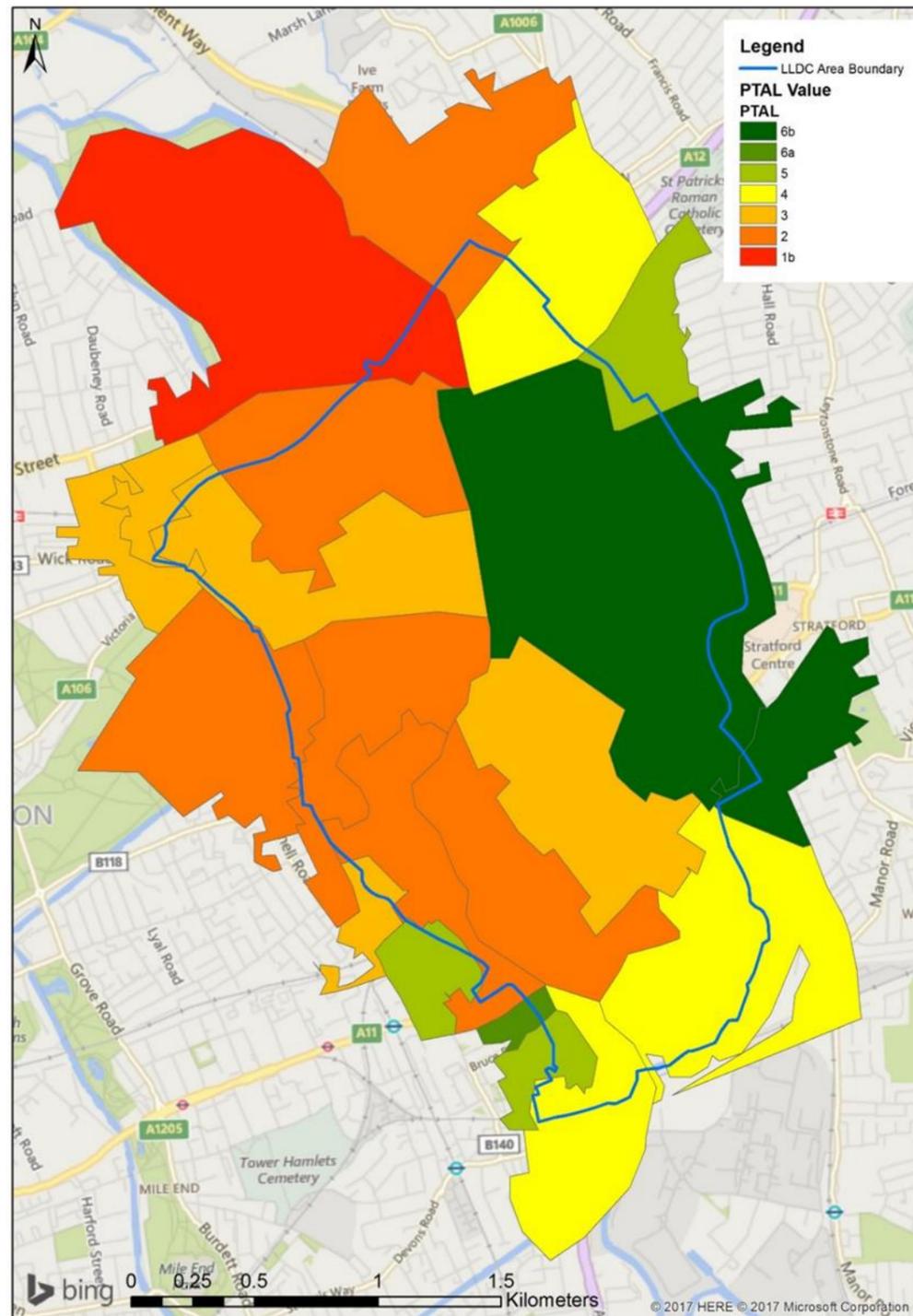


Figure 18: PTAL level in the LLDC area

### 5.9 Air Quality

The LLDC Planning Area is located within Air Quality Management Areas (AQMA) (Figure 19). Hackney, Waltham Forest and Tower Hamlets have AQMAs that cover the entire borough. In Newham the AQMA follows the major road networks, due to

nitrogen dioxide being produced by hydrocarbon combustion from vehicle use and the high levels of congestion in places.

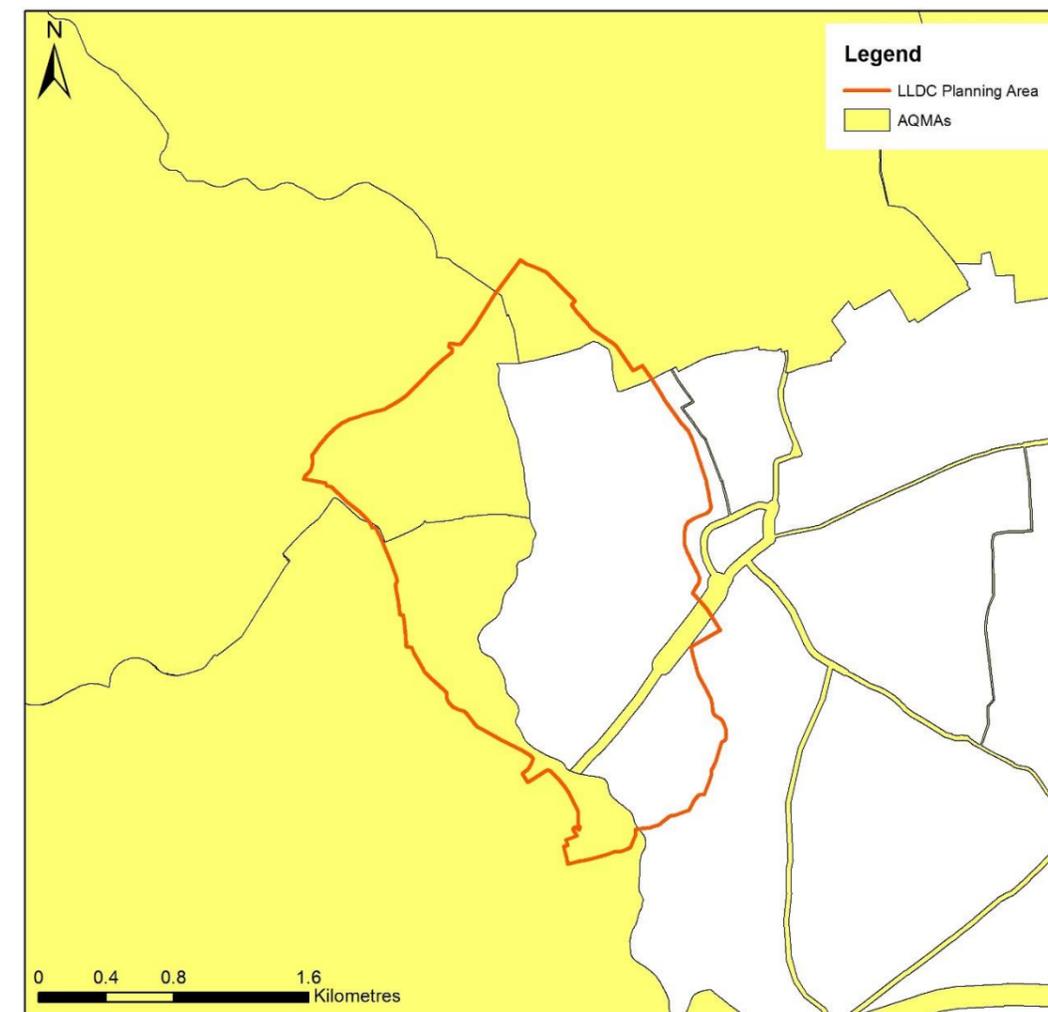


Figure 19: AQMA

### 5.10 Biodiversity

Within the LLDC Planning Area there are no designated sites, however within the wider boroughs there are a number of key designations (Figure 20).

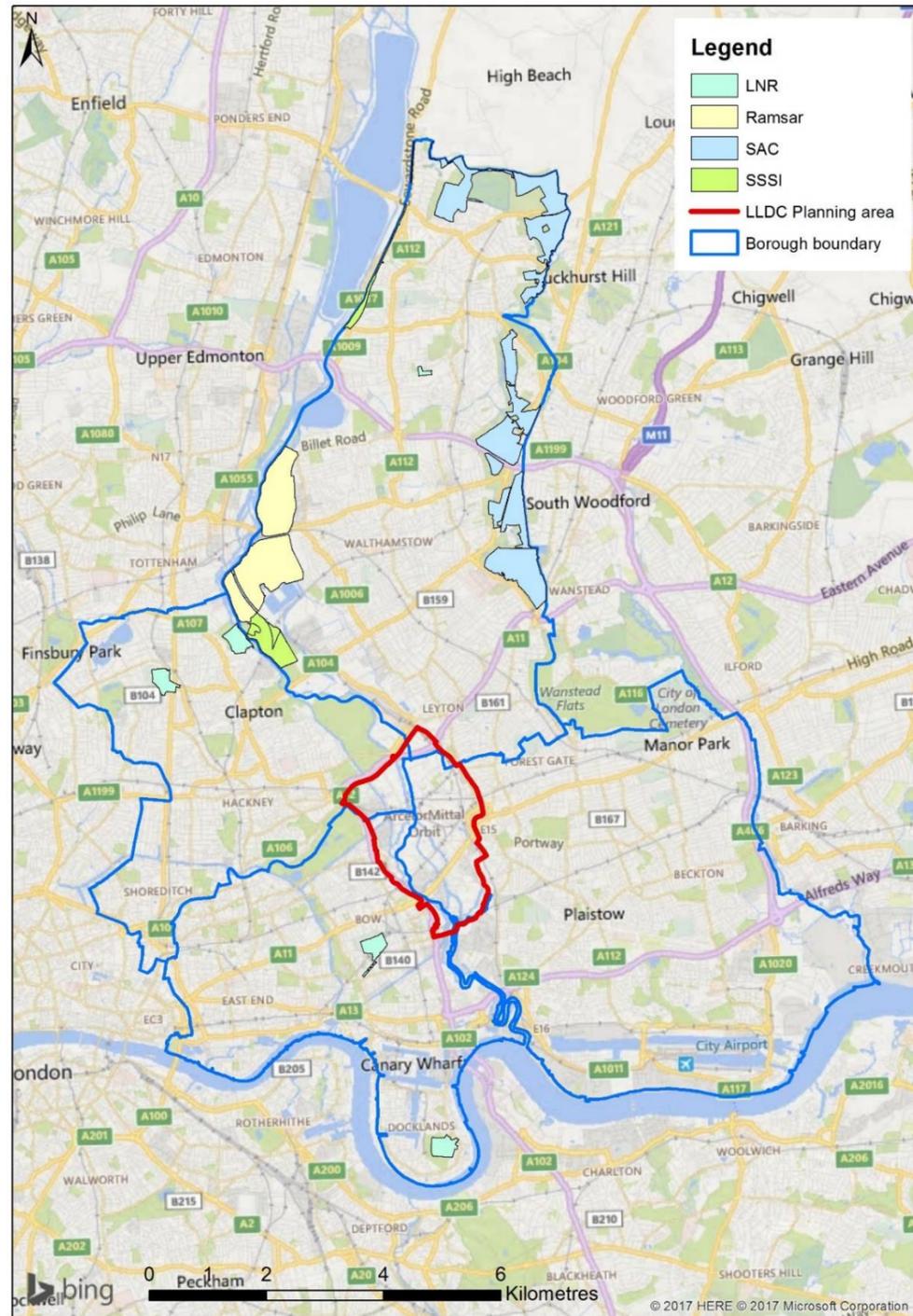


Figure 20: Designated sites

Some of the closest designated areas include:

- Ackroyd Drive Local Nature Reserve (LNR);
- Tower Hamlets Cemetery Park LNR;
- Lee Valley Special Protection Area (SPA)/Ramsar;
- Walthamstow Marshes Site of Special Scientific Interest (SSSI); and
- Epping Forest SSSI/ Special Area of Conservation (SAC).

Although not specifically designated land, there are a number of key land uses such as woodlands, marshland and waterways which will also be important for biodiversity (Figure 21).

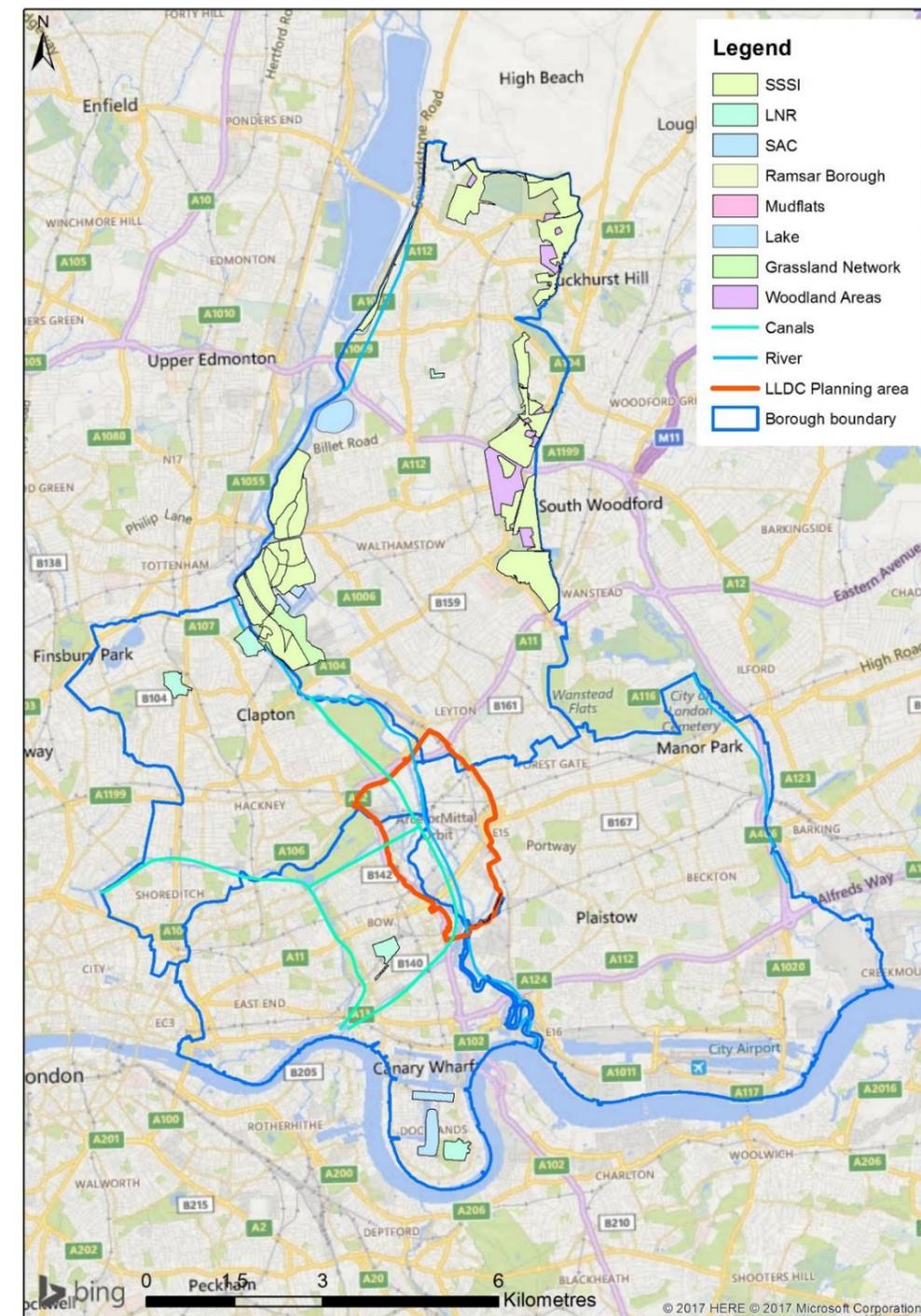


Figure 21: Designated sites and other land use types

The Queen Elizabeth Olympic Park (QEOP) has a BAP target of 45ha of BAP habitat within the park<sup>26</sup> (Table 12).

Table 12 Biodiversity Action Plan (BAP) targets within the QEOP

Habitat	BAP Target
Built environment	3.32ha
Parks, squares and amenity space	5.5ha
Allotments	0.87ha
Brownfield habitats	5.3ha
Species rich grassland	26.79ha
Trees and scrub	12.1ha
Wet woodland	0.84ha
Rivers	12.1ha
Reedbed	1.2ha
Ponds	0.36ha
Temporary landscapes	1.98ha

### 5.11 Climate change

Figure 22 shows that Tower Hamlets has consistently had higher CO<sub>2</sub> emissions than the other London boroughs. Over the eight-year period, all boroughs have experienced a small reduction in CO<sub>2</sub> emissions but there has been fluctuation.

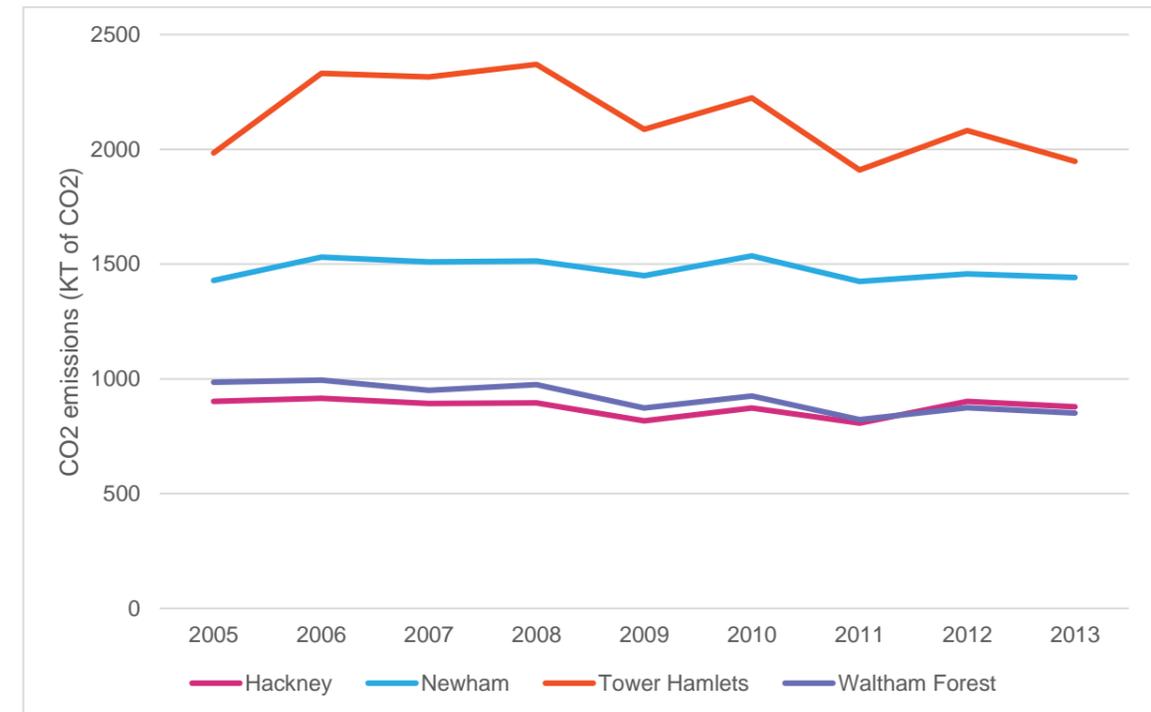


Figure 22: CO<sub>2</sub> emission estimates (Kt of CO<sub>2</sub>)

Prolonged rainfall has historically caused surface water flooding. In 1999 an area around White Post Lane and in nearby areas of Hackney, led to flooding of residential and commercial properties to a depth of approximately 0.75m. In the vicinity of Wick Road six surface water flooding events were recorded between November 2006 and July 2007 and within the vicinity of Marshall Road and Maud Road (both Waltham Forest), there have been records of flooding.

Several parts of Hackney are susceptible to surface water flooding and ponding, including along Wick Road. Similar issues are present in low lying areas of Newham, particularly close to the River Lea, River Thames and Royal Docks. Modelling has predicted ponding to occur along several roads and railway cuttings throughout the borough.

### 5.12 Cultural Heritage

Within the vicinity of the LLDC Planning Area are two Scheduled Monuments, Parnell Road Bridge and Stratford Langthorne Abbey. Tidehill Mill (also known as House Mill) is the only Grade I Listed Building within the LLDC Planning Area, and there are a number of Grade II\* Listed Buildings; Hertford Union Canal; Church of St Mary of Eton with St Augustine; and Abbey Mills Pumping Station. Grade II\* Listed buildings which fall just outside the Planning Area are the Parnell Road Bridge, St Mary's Church (Island Site) and Bow Road. A total of 58 Grade II Listed Buildings are located within or in proximity of the LLDC Planning Area.

<sup>26</sup> LLDC, Legacy Communities Scheme Biodiversity Action Plan 2014-2019. August 2013. [www.queenelizabetholympicpark.co.uk/-/.../lldc/...biodiversity/legacy-communities](http://www.queenelizabetholympicpark.co.uk/-/.../lldc/...biodiversity/legacy-communities)

There are five Conservation Areas within the LLDC Planning Area: Hackney Wick, Fish Island and White Post Lane, Three Mills, Sugarhouse Lane, and a small part of Stratford St John’s. A number also lie just outside the planning boundary: Victoria Park, Fairfield Road, Limehouse Cut, Roman Road Market, Thornhill Road. These Conservation Areas afford protection to the character and appearance of areas because of their particular architectural or historic interest.

Archaeology Priority Areas are areas where there is significant known archaeological interest or potential for new discoveries. One area covers the majority of the LLDC Planning Area including; archaeology related to crossing at Bow Bridge; River Lea, Valley and tributaries; Stratford; and London to Colchester Roman Road.

### 5.13 Geology and soils

The underlying soils of the LLDC Planning area are classified as loamy and clayey soils, with naturally occurring high groundwater levels. The area is located within the wider London Basin which has been shaped by a relatively thick chalk syncline. This basin has been in-filled over time by a series of clays and sands, most notably the fossil-rich and impermeable London Clay. The River Thames and Lea have altered paths and scoured channels deeper, leaving deposits of sand and gravel in terrace formations over the underlying geology.

The area has a history of industrial use including landfilling, soap factory, gas works and a number of industrial operations. Consequently, the development of the QEOP resulted in the need to manage heavily contaminated soils.

### 5.14 Waste Management

Household waste collection within the LLDC Planning Area is carried out by the host boroughs’ waste collection services. The main issues facing the four host boroughs are recycling, fly tipping, and specialist waste collection. All four host boroughs also offer at least one household recycling centre; Waltham Forest has the most centres with three. Each of the centres accept all household waste, and one in Waltham Forest is also able to accept some construction waste. All four boroughs advertise various types of specialist waste collection such as garden and food waste, and all have access to the City of London hazardous waste collection service.

Recycling is encouraged across the host boroughs for all types of waste. Household waste is the most strongly promoted, with Hackney and Waltham forest offering rewards for increasing household recycling rates. Household recycling rates have generally increased from 2005, however may have plateaued in recent years. The host boroughs generally perform more poorly compared to both London and England, as shown in Figure 23<sup>27</sup>.

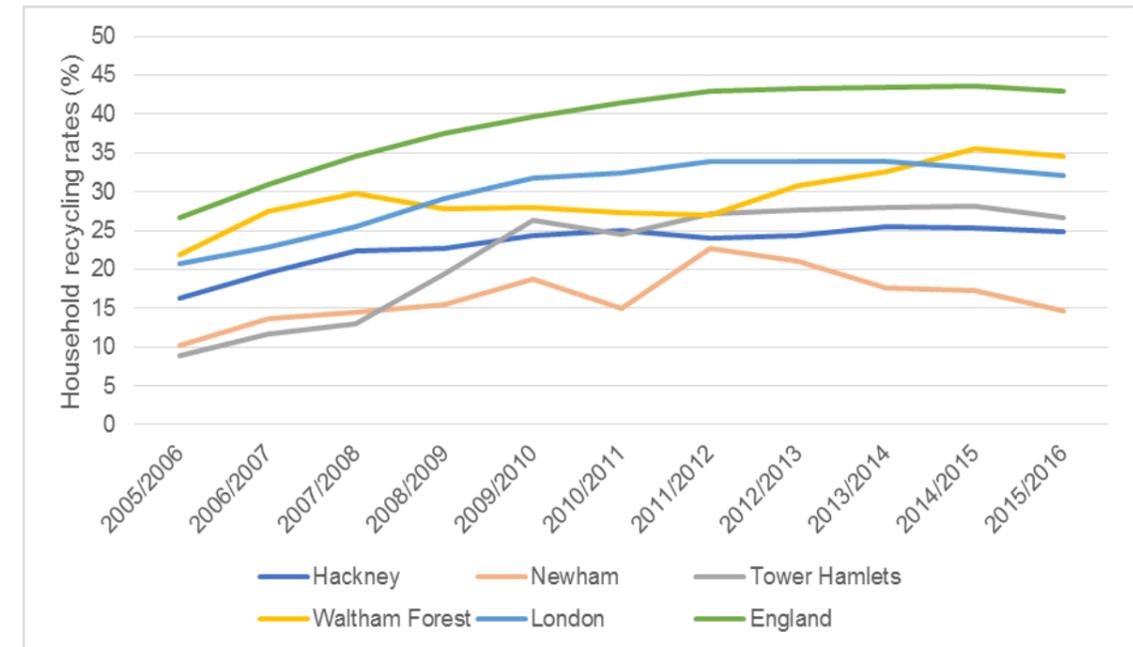


Figure 23: Recycling rates

<sup>27</sup> Department for Environment, Food & Rural Affairs, Household Waste Recycling Rates, Borough. London Datastore- data.london.gov.uk

## 6 Key sustainability issues

Following the review of the relevant plans, programmes, strategies and objectives, and the assessment of baseline information, a number of key issues were identified through the IIA process which helped to develop the new LLDC Local Plan (Table 13).

Table 13: Key sustainability issues for the LLDC

Topic	Key issues	Opportunities
Demographic	<ul style="list-style-type: none"> <li>Population growth</li> <li>Young population, ageing over the plan period and associated isolation</li> <li>Discrimination</li> <li>Pockets of deprivation</li> <li>Poverty</li> <li>Increased pressures on housing and services</li> </ul>	<ul style="list-style-type: none"> <li>New developments should ensure inclusive design for the diverse population of the LLDC area.</li> <li>The design of the built environment should encourage social cohesion and reduce isolation.</li> <li>The implications of population growth on housing and services should be managed.</li> <li>The benefits of growth and new development should be fairly distributed.</li> <li>There has been progress towards improving deprivation in the LLDC Planning area and this should continue.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Rising house prices</li> <li>Lack of affordable housing</li> <li>Homelessness</li> <li>Overcrowding</li> <li>Community displacement</li> <li>Gentrification</li> <li>Increasing cost of housing relative to wages</li> <li>Balance between employment land and housing need</li> </ul>	<ul style="list-style-type: none"> <li>Delivery of a diverse range of housing to meet the needs of local residents and other Londoners, such as build to rent, older persons housing and a mixture of sizes.</li> <li>Contributing to the housing needs across the boroughs and London, and ensuring the delivery of housing targets.</li> <li>Delivery of homes which are of a high standard and encourage more sustainable living.</li> <li>Delivery of mixed-use developments which can meet both economic and housing demands.</li> <li>Delivery of lifetime neighbourhoods<sup>28</sup>.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>Changing economy</li> <li>Uncertainty over the decision to leave the European Union</li> <li>Balance between employment land and housing pressures</li> <li>Viability of town centre</li> <li>Productivity</li> </ul>	<ul style="list-style-type: none"> <li>Increase the economy in and around the LLDC Planning Area, supporting existing businesses and new start-ups, particularly small medium enterprises (SMEs).</li> <li>Accommodate growth in employment in employment clusters.</li> </ul>

Topic	Key issues	Opportunities
	<ul style="list-style-type: none"> <li>Impact of mixed use development (for example night-time activities and residents)</li> </ul>	<ul style="list-style-type: none"> <li>Create more mixed environments for both business and residential uses.</li> <li>Promote innovation and increase competitiveness.</li> <li>Support more diverse businesses, particularly those owned by and supporting ethnic minority groups.</li> </ul>
Employment	<ul style="list-style-type: none"> <li>Disparities between income and the cost of living, particularly in terms of housing</li> <li>Growth of low paid employment and zero hour contracts</li> <li>High employment rates within ethnic minorities and females</li> </ul>	<ul style="list-style-type: none"> <li>Provision of suitable employment space to meet different sector requirements.</li> <li>Provision of affordable and low cost employment space.</li> <li>Provision of employment that meets the requirements of a diverse population, continuing growing trends of apprenticeships alongside other employment and educational opportunities.</li> <li>Provision of employment which encourages the development of skills and provides training opportunities.</li> </ul>
Health	<ul style="list-style-type: none"> <li>Increased health inequalities across the population</li> <li>A population living with complex health needs for longer periods</li> <li>Increasing and changing pressures on local health services</li> <li>Low levels of physical activity and increased obesity levels</li> <li>High levels of fuel poverty</li> </ul>	<ul style="list-style-type: none"> <li>Developments should meet the needs of a wide range of people.</li> <li>Developments should ensure the provision of different services to meet an ageing and more diverse population.</li> <li>Developments should consider their impact on health and wellbeing and how they can be used to promote healthier life styles, e.g. through the 'healthy streets', limiting access to unhealthy food and promoting active travel.</li> <li>Developments should be sustainable and energy efficient, but also affordable, to reduce issues such as fuel poverty.</li> </ul>
Crime and safety	<ul style="list-style-type: none"> <li>Perceptions of safety</li> <li>Increased threat of major incidents</li> <li>Fear of crime creating a barrier to activities and increasing isolation</li> <li>Presence of 'high value' terrorist targets</li> </ul>	<ul style="list-style-type: none"> <li>Use of lighting and passive surveillance to help improve perceptions of safety.</li> <li>Designing out crime where possible in all new developments.</li> </ul>

<sup>28</sup> Lifetime neighbourhoods are identified by the DCLG as places designed to be inclusive regardless of age or disability: <https://www.gov.uk/government/publications/lifetime-neighbourhoods--2>

Topic	Key issues	Opportunities
	<ul style="list-style-type: none"> <li>Large areas of vacant/derelict land</li> </ul>	
Education	<ul style="list-style-type: none"> <li>Demand on school places to meet growing needs</li> <li>Lower percentages of qualified individuals within ethnic minorities</li> <li>Ensuring adults are sufficiently skilled to enter employment</li> </ul>	<ul style="list-style-type: none"> <li>Promote educational excellence in learning and research.</li> <li>Encourage a co-ordinated approach with local authorities to ensure sufficient school places are provided in the right locations.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Levels of public transport access in certain areas</li> <li>Integrating neighbourhoods and increasing connectivity with new developments</li> <li>Overcrowding and congestion</li> </ul>	<ul style="list-style-type: none"> <li>Improve connectivity by all modes of transport.</li> <li>Improve the design of existing and new transport hubs to ensure they can be accessed by all.</li> </ul>
Air quality	<ul style="list-style-type: none"> <li>High levels of NO2 emissions in key hotspots.</li> <li>Continuing air quality improvements across the boroughs alongside increased development.</li> </ul>	<ul style="list-style-type: none"> <li>Technological developments, such as increasing the use of electric vehicles (e.g. through the provision of charging points or the use of public electric vehicles).</li> <li>Integration of green infrastructure.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>The protection of key environmental assets within the LLDC boundary</li> <li>Loss of biodiversity and reduced ecological resilience as a result of increased pressure from development</li> <li>Areas deficient in nature surrounding the LLDC management area</li> </ul>	<ul style="list-style-type: none"> <li>Improve protection of existing sites identified as being of value for nature conservation.</li> <li>Integration of green infrastructure into the built environment, particularly in those areas with poor access to nature.</li> <li>Promotion of community involvement in the protection and management of natural capital.</li> </ul>
Climate change	<ul style="list-style-type: none"> <li>Energy use and demand in the LLDC management area.</li> <li>Risk of flooding to property from surface water and fluvial flooding.</li> <li>The protection and management of CDAs.</li> <li>Energy efficiency and the production of renewable or local energy</li> </ul>	<ul style="list-style-type: none"> <li>Increase the use of renewable energy and on-site energy generation.</li> <li>Restricting development in flood-risk prone areas.</li> </ul>
Cultural heritage	<ul style="list-style-type: none"> <li>The protection of key historical assets within the LLDC management area</li> </ul>	<ul style="list-style-type: none"> <li>Integration of historical assets with modern developments, which respect</li> </ul>

Topic	Key issues	Opportunities
	<ul style="list-style-type: none"> <li>Retaining historical and cultural heritage within development and managing development pressures</li> </ul>	<ul style="list-style-type: none"> <li>the history of the area and encourages change.</li> <li>Promotion of community involvement in the protection and management of historical assets.</li> </ul>
Geology and soils	<ul style="list-style-type: none"> <li>Level of remediation required for large areas of brownfield land</li> <li>Modification to the landscape and subsequently geomorphological processes</li> </ul>	<ul style="list-style-type: none"> <li>Focus on prevention and remediation of soil contamination</li> </ul>
Waste management	<ul style="list-style-type: none"> <li>Increasing pressures on waste sites and infrastructure to meet demand from new development</li> <li>Increasing disposal costs</li> <li>Climate change impact from waste</li> <li>A need to co-ordinate waste management across borough boundaries</li> <li>Likely increase in waste arisings alongside population growth</li> </ul>	<ul style="list-style-type: none"> <li>Reducing waste and increasing recycling performance to lower waste management costs and environmental impacts.</li> <li>Promotion of circular economy practices.</li> <li>Increase use of reuse and recovery facilities.</li> </ul>

## 7 IIA Framework

### 7.1 Establishing the IIA Framework

An important element of the IIA process is the determination of IIA objectives. An objective is a statement of what is intended, specifying a desired direction of change. The achievement of objectives is normally measured by using indicators and need to be specific and measurable.

IIA objectives are used to show whether the objectives of the Local Plan are beneficial for the achievement of sustainable development, to compare the sustainability effects of alternatives, or to suggest improvements.

An objectives-led approach is considered to be most appropriate to assessing the Local Plan as it enables assessment of the extent to which each aspect of the Local Plan contributes towards delivery of each objective as opposed to just meeting prescribed targets. Thus a more qualitative approach is adopted that allows for a better identification and description of effects rather than attempting to assign a quantitative value, which is more limited and restrictive at this strategic level.

Draft IIA objectives have been developed in accordance with:

- the context review;
- collection of baseline data;
- the key issues derived from the context review and baseline data;
- knowledge of technical specialists; and
- discussions with the LLDC.

An important aspect identified as part of the context review that has implications for the Local Plan IIA, is the way in which the GLA (and associated bodies) is currently undertaking IIA for a number of policy documents, including the London Plan, Mayor's Transport Strategy and London Environment Strategy. A common approach has been taken with respect to the development of IIA objectives, with a single set of objectives being used for each assessment. This is an important aspect of these IIAs, as it demonstrates a co-ordinated approach to IIA at a strategic, pan-London level.

The GLA IIA framework was therefore used as a starting point from which to develop the IIA framework for the Local Plan. It was important to demonstrate where the sustainability issues applicable to the LLDC Planning Area were covered up by the GLA IIA framework, in order to assess the suitability of these existing objectives for use in the Local Plan IIA. Should they not adequately address issues, or are superfluous to requirements, objectives could then be amended or deleted as required.

During the preparation of each of the individual strategy, it may be determined that particular objectives are scoped out as they are deemed as not being applicable to the scope and intent

of the strategy. In addition, the order of the IIA objectives may vary between the IIAs of the strategies to reflect the structure of the baseline for that particular strategy.

Alongside each IIA objective is a set of guide questions that will be used to assess whether the Local Plan will help to achieve or conflict with the objective.

Guide questions are coloured to indicate which of the assessment elements of the IIA the question addresses in order to fully demonstrate how these assessments have been integrated as part of the IIA and to ensure that the relevant aspects of specific assessments are easily navigable.

A total of 24 IIA objectives have been used for the assessment of the new Local Plan. Table 14 below shows the link between the SEA Directive issues and IIA objectives (detailed list of the IIA objectives is presented in Table 15).

Table 14: Link between SEA topics and IIA Objectives

SEA Directive Topic	IIA Objective(s)
Material Assets	5, 6, 23
Climatic Factors	14, 15, 16, 17, 19
Biodiversity	20
Fauna	20
Flora	20
Water	18
Soil	22
Air	14
Cultural heritage, architectural and archaeological heritage	13, 21
Landscape	7, 21
Population	2, 3, 9, 10, 12
Human health	3, 4, 8, 24

Table 15: LLDC sustainability issues against the GLA IIA framework

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)	LLDC sustainability issues	LLDC IIA Guide Questions (SEA/SA, EQIA, HIA, CSIA) (Amended/new questions in bold)
<b>1. Equality and inclusion</b>	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population	<ul style="list-style-type: none"> <li>• Reduce poverty and social exclusion?</li> <li>• Promote a culture of equality, fairness and respect for people and the environment?</li> <li>• Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people?</li> <li>• Provide opportunities for people to choose an active, fulfilling life?</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of gentrification from regeneration</li> <li>• Community displacement</li> <li>• Low levels of physical activity</li> <li>• Isolation</li> <li>• Discrimination</li> <li>• Change to community cohesion</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce poverty and social exclusion?</li> <li>• Promote a culture of equality, fairness and respect for people and the environment?</li> <li>• Promote an inclusive design approach ensuring a barrier free environment for all, especially disabled people?</li> <li>• Provide opportunities for people to choose an active, fulfilling life?</li> </ul>
<b>2. Social Integration</b>	To ensure London has socially integrated communities which are strong, resilient and free of prejudice	<ul style="list-style-type: none"> <li>• Provide opportunities for Londoners to actively participate in the city's life, decision making and communities?</li> <li>• Provide opportunities for Londoners of every background to connect?</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of gentrification from regeneration</li> <li>• Community displacement</li> <li>• Low levels of physical activity</li> <li>• Isolation</li> <li>• Discrimination</li> <li>• Change to community cohesion</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Provide opportunities for local residents to actively participate in decision making and the local community?</b></li> <li>• <b>Provide opportunities for local residents of every background to connect and develop a local sense of ownership</b></li> </ul>
<b>3. Health and Health Inequalities</b>	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	<ul style="list-style-type: none"> <li>• Improve access and equity of access to health and social care services and facilities?</li> <li>• Reduce differentials in life expectancy and healthy life expectancy across London?</li> <li>• Promote increases in physical activity, particularly in areas of health and social deprivation?</li> <li>• Reduce inequalities in levels of physical activity?</li> <li>• Improve the physical and mental health and wellbeing of communities?</li> <li>• Support the provision of quality, affordable and healthy food?</li> <li>• Reduce inequalities in physical and mental health and wellbeing?</li> </ul>	<ul style="list-style-type: none"> <li>• Increased health inequalities across the population</li> <li>• The population living with complex health needs for longer periods</li> <li>• Increasing and changing pressures on local health services</li> <li>• Low levels of physical activity and increased obesity levels</li> <li>• Social inequalities</li> <li>• Isolation</li> <li>• Access to healthy food opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• Improve access and equity of access to health and social care services and facilities?</li> <li>• Promote increases in physical activity, particularly in areas of health and social deprivation?</li> <li>• Reduce inequalities in levels of physical activity?</li> <li>• Improve the physical and mental health and wellbeing of communities?</li> <li>• Support the provision of quality, affordable and healthy food?</li> <li>• Reduce inequalities in physical and mental health and wellbeing?</li> <li>• <b>Promote and deliver community sports participation, including disability sports?</b></li> </ul>
<b>4. Crime, safety and security</b>	To contribute to safety and security and the perceptions of safety	<ul style="list-style-type: none"> <li>• Reduce levels of crime?</li> <li>• Reduce the opportunity for crime and antisocial behaviour?</li> <li>• Create a travel environment that feels safe to all users during the day time and night time?</li> <li>• Increase security and resilience to major incidents?</li> <li>• Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?</li> </ul>	<ul style="list-style-type: none"> <li>• Large areas of vacant / derelict land</li> <li>• Presence of 'high value' terrorist targets</li> <li>• Perceptions of safety</li> <li>• Fear of crime increasing social isolation</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce levels of crime?</li> <li>• Reduce the opportunity for crime and antisocial behaviour?</li> <li>• Create a travel environment that feels safe to all users during the day time and night time?</li> <li>• Increase security and resilience to major incidents?</li> <li>• Improve perceptions of safety and fear of crime to help remove barriers to activities leading to reduced social isolation?</li> </ul>
<b>5. Housing Supply,</b>	To provide a quantum, type, quality and tenure of	<ul style="list-style-type: none"> <li>• Help to facilitate the delivery of house building that meets the needs of Londoners?</li> </ul>	<ul style="list-style-type: none"> <li>• Rising house prices</li> <li>• Lack of affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>• Help to facilitate the delivery of house building that meets the needs of Londoners?</li> </ul>

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<b>Quality, Choice and Affordability</b>	housing (including specialist and affordable provision) to better meet demographic change and household demand	<ul style="list-style-type: none"> <li>• <b>Reduce homelessness and overcrowding?</b></li> <li>• Increase the range and affordability of housing?</li> <li>• Promote accessible and adaptable homes, improving choice for people who require them?</li> <li>• Provide housing that encourages a sense of community and enhances the amenity value of the community?</li> <li>• <b>Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health?</b></li> </ul>	<ul style="list-style-type: none"> <li>• Homelessness</li> <li>• Overcrowding</li> <li>• Increasing cost of housing relative to wages</li> <li>• Delivery of mixed-use developments which can meet both economic and housing demands.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Reduce homelessness and overcrowding?</b></li> <li>• Increase the range and affordability of housing?</li> <li>• Promote accessible and adaptable homes, improving choice for people who require them?</li> <li>• Provide housing that encourages a sense of community and enhances the amenity value of the community?</li> <li>• <b>Improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health?</b></li> </ul>
<b>6. Sustainable Land Use</b>	Make the best and most efficient use of land so as to support sustainable patterns and forms of development?	<ul style="list-style-type: none"> <li>• <b>Make the best use of land through appropriate development on brownfield sites and use of existing transport network?</b></li> <li>• Ensure that higher densities development does not adversely impact on different groups of people?</li> <li>• Promote regeneration and provide benefits for existing communities?</li> <li>• <b>Integrate land use and transport?</b></li> </ul>	<ul style="list-style-type: none"> <li>• Remediation requirements of brownfield land</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Make the best use of land through appropriate development on brownfield sites and use of existing transport network?</b></li> <li>• Ensure that higher densities development does not adversely impact on different groups of people?</li> <li>• Promote regeneration and provide benefits for existing communities?</li> <li>• <b>Integrate land use and transport?</b></li> </ul>
<b>7. Design</b>	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness, reducing the need to travel by motorized transport	<ul style="list-style-type: none"> <li>• <b>Conserve and enhance the townscape/cityscape character?</b></li> <li>• <b>Create and maintain a safe and attractive public realm which encourages people to walk and cycle?</b></li> <li>• <b>Help to make people feel positive about the area they live in and promote social integration?</b></li> <li>• <b>Encourage an inclusive design approach taking into account the needs of a variety of users?</b></li> <li>• <b>Help to improve the wider built environment and create a sense of place and 'vibrancy'?</b></li> <li>• <b>Promote high quality design and sustainable design and construction methods?</b></li> <li>• <b>Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments?</b></li> <li>• <b>Retain the spatial diversity of communities?</b></li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring quality design whilst retaining viability</li> <li>• Integration of varying neighbourhoods</li> <li>• Changes to community cohesion</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Conserve and enhance the townscape/cityscape character?</b></li> <li>• <b>Create and maintain a safe and attractive public realm which encourages people to walk and cycle?</b></li> <li>• <b>Help to make people feel positive about the area they live in and promote social integration?</b></li> <li>• <b>Encourage an inclusive design approach taking into account the needs of a variety of users?</b></li> <li>• <b>Help to improve the wider built environment and create a sense of place and 'vibrancy'?</b></li> <li>• <b>Promote high quality design and sustainable design and construction methods?</b></li> <li>• <b>Improve legibility and ease of use of the built environment for people with sensory or cognitive impairments?</b></li> <li>• <b>Retain the spatial diversity of communities?</b></li> <li>• <b>Seek to improve safety and the perception of safety in local communities by designing out crime</b></li> </ul>
<b>8. Accessibility</b>	To maximise accessibility for all in and around London	<ul style="list-style-type: none"> <li>• <b>Improve accessibility to all public transport modes?</b></li> <li>• <b>Increase equality of access to services and facilities?</b></li> <li>• <b>Improve links between areas, neighbourhoods and communities?</b></li> </ul>	<ul style="list-style-type: none"> <li>• Integrating neighbourhoods and increasing connectivity with new developments</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Improve accessibility to all public transport modes?</b></li> <li>• <b>Increase equality of access to services and facilities?</b></li> <li>• <b>Improve links between areas, neighbourhoods and communities?</b></li> </ul>

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<b>9. Connectivity</b>	To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes	<ul style="list-style-type: none"> <li>• Improve connectivity by public transport in outer London?</li> <li>• Improve connectivity across the River Thames by all modes of transport, particularly in east London?</li> <li>• Reduce traffic volumes and congestion on roads across all parts of London?</li> <li>• Reduce congestion on public pavements and footpaths, especially in central London?</li> <li>• Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)?</li> <li>• Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</li> <li>• Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</li> <li>• Encourage active travel by creating safe, attractive routes?</li> </ul>	<ul style="list-style-type: none"> <li>• Public transport access in certain areas</li> <li>• Overcrowding and congestion</li> <li>• Integrating neighbourhoods and increasing connectivity with new developments</li> </ul>	<ul style="list-style-type: none"> <li>• Improve connectivity <b>across the LLDC area</b> by all modes of public transport?</li> <li>• Reduce traffic volumes and congestion on roads across all parts of London?</li> <li>• Reduce congestion on public pavements and footpaths, especially in central London?</li> <li>• Reduce severance and consequent inequalities for those groups who are more greatly affected by severance (e.g. people on low incomes, disabled people, children and young people, older people and people dependent on walking and using public transport for travel)?</li> <li>• Encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)?</li> <li>• Reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live?</li> <li>• Encourage active travel by creating safe, attractive routes?</li> </ul>
<b>10. Economic competitiveness and employment</b>	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all	<ul style="list-style-type: none"> <li>• Help maintain London as an internationally competitive city?</li> <li>• Increase London's productivity?</li> <li>• Facilitate the provision of the right type of employment land and floorspace in the right place to ensure that London remains economically competitive?</li> <li>• Help generate satisfying, secure and rewarding new jobs?</li> <li>• Create healthy, productive workplaces?</li> <li>• Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration?</li> <li>• Minimise barriers to employment (e.g. transport, financial, childcare)?</li> <li>• Help reduce overall unemployment, particularly long-term and youth unemployment?</li> <li>• Improve the resilience of business and the economy?</li> <li>• Help to diversify the economy?</li> </ul>	<ul style="list-style-type: none"> <li>• Changing economy</li> <li>• Uncertainty over the decision to leave the European Union</li> <li>• Balance between employment land and housing pressures</li> <li>• Viability of town centre</li> <li>• Productivity</li> <li>• Impact of mixed use development (e.g. night-time activities and residents)</li> <li>• Growth of low paid employment and zero hour contracts</li> <li>• High unemployment rates within ethnic minorities and females</li> <li>• Disparities between income and the cost of living</li> </ul>	<ul style="list-style-type: none"> <li>• Increase productivity and deliver economic benefits across the LLDC Planning Area and East London?</li> <li>• Facilitate the provision of the right type of employment land and floorspace in the right place to ensure the local economy remains competitive and productive?</li> <li>• Help generate satisfying, secure and rewarding new jobs?</li> <li>• Create healthy, productive workplaces?</li> <li>• Help to provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration?</li> <li>• Minimise barriers to employment (e.g. transport, financial, childcare)?</li> <li>• Help reduce overall unemployment, particularly long-term and youth unemployment?</li> <li>• Improve the resilience of business and the local economy?</li> <li>• Help to diversify the local economy?</li> </ul>

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		<ul style="list-style-type: none"> <li>Encourage business start-ups and support the growth of businesses, particularly SMEs?</li> <li>Enable people with physical and mental health conditions and disabilities to stay in employment?</li> <li>Support working families?</li> <li>Support social enterprise, voluntary and community sectors?</li> <li>Support small, local retail offers?</li> </ul>		<ul style="list-style-type: none"> <li>Encourage business start-ups and support the growth of businesses, particularly SMEs?</li> <li>Enable people with physical and mental health conditions and disabilities to stay in employment?</li> <li>Support working families?</li> <li>Support social enterprise, voluntary and community sectors?</li> <li>Support small, local retail offers?</li> </ul>
<b>11. Infrastructure</b>	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness	<ul style="list-style-type: none"> <li>Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery?</li> <li>Unlock land that has capacity for housing development?</li> <li>Provide accessible infrastructure to connect new housing developments to key services?</li> <li>Ensure equity of access to environmental, social and physical infrastructure?</li> </ul>	<ul style="list-style-type: none"> <li>Balance between employment land and housing need</li> <li>Ensuring quality design whilst retaining viability</li> <li>Integration of varying neighbourhoods</li> <li>Ensuring equal access to facilities and services to meet all needs</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that provision of environmental, social and physical infrastructure support economic competitiveness and housing delivery?</li> <li>Unlock land that has capacity for housing development?</li> <li>Provide accessible infrastructure to connect new housing developments to key services?</li> <li>Ensure equity of access to environmental, social and physical infrastructure?</li> </ul>
<b>12. Culture</b>	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	<ul style="list-style-type: none"> <li>Improve accessibility for all to cultural venues</li> <li>Improve participation by all in cultural activities and support cultural activities that promote social integration?</li> <li>Provide access to affordable cultural activities in areas of deprivation?</li> <li>Help to provide cultural infrastructure needed to sustain and strengthen a growing sector?</li> </ul>	<ul style="list-style-type: none"> <li>Retaining historical and cultural heritage within developments and manage any development pressures</li> <li>The protection of key historical assets within the LLDC management area</li> </ul>	<ul style="list-style-type: none"> <li>Improve accessibility for all to cultural venues</li> <li>Improve participation by all in cultural activities and support cultural activities that promote social integration?</li> <li>Provide access to affordable cultural activities?</li> <li>Help to provide cultural infrastructure needed to sustain and strengthen a growing sector?</li> </ul>
<b>13. Education and skills</b>	To ensure the education and skills provision meets the needs of London's existing and future labour market and improves life chances for all	<ul style="list-style-type: none"> <li>Help to improve learning and the attainment of skills to the right employment opportunities?</li> <li>Ensure provision of sufficient school places to meet growing needs across London?</li> <li>Support transitions from education to work?</li> <li>Support London's status as an international city of learning, research and development?</li> <li>Encourage education and training that meets the needs of business, including vocational training?</li> <li>Support adult education to improve social mobility and life chances for all ages?</li> <li>Support early year's education and support, particularly in areas of deprivation?</li> </ul>	<ul style="list-style-type: none"> <li>Demand on school places to meet growing needs</li> <li>Low percentages of qualified individuals within ethnic minorities</li> <li>Ensuring the provision of school place is in appropriate locations</li> <li>Ensuring adults are sufficiently skilled to enter employment</li> </ul>	<ul style="list-style-type: none"> <li>Help to improve learning and the attainment of skills to the right employment opportunities?</li> <li>Ensure provision of sufficient school places to meet growing needs across London?</li> <li>Support transitions from education to work?</li> <li>Support London's status as an international city of learning, research and development?</li> <li>Encourage education and training that meets the needs of business, including vocational training?</li> <li>Support adult education to improve social mobility and life chances for all ages?</li> </ul>
<b>14. Air quality</b>	To reduce emissions and concentrations of harmful atmospheric pollutants,	<ul style="list-style-type: none"> <li>Reduce NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions?</li> </ul>	<ul style="list-style-type: none"> <li>High levels of NO<sub>2</sub> emissions in key hotspots.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions?</li> </ul>

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	particularly in areas of poorest air quality, and reduce exposure	<ul style="list-style-type: none"> <li>• Reduce the number of people exposed to particulates and NO<sub>2</sub> concentrations, particularly vulnerable people?</li> <li>• Reduce inequalities in terms of access to clean air across London, particularly for those:                             <ul style="list-style-type: none"> <li>• who live in deprived areas?</li> <li>• who live, learn or work near busy roads or construction sites?</li> <li>• who are more vulnerable?</li> </ul> </li> <li>• Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals?</li> <li>• Help to achieve national and international standards for air quality?</li> <li>• Reduce costs to the economy resulting from premature deaths due to poor air quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Continuing air quality improvements across the boroughs alongside increased development.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce the number of people exposed to particulates and NO<sub>2</sub> concentrations, particularly vulnerable people?</li> <li>• Reduce inequalities in terms of access to clean air, particularly for those:                             <ul style="list-style-type: none"> <li>• who live in deprived areas?</li> <li>• who live, learn or work near busy roads or construction sites?</li> <li>• who are more vulnerable?</li> </ul> </li> <li>• Improve air quality around areas which may have high concentrations of vulnerable people such as schools, outdoor play areas, care homes and hospitals?</li> <li>• Help to achieve national and international standards for air quality?</li> <li>• Reduce costs to the economy resulting from premature deaths due to poor air quality?</li> </ul>
<b>15. and 16. Climate change adaptation and mitigation</b>	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks	<ul style="list-style-type: none"> <li>• Protect London from climate change impacts?</li> <li>• Improve the micro-climate and ameliorate the impact of the heat island effect on Londoners?</li> <li>• Help London to function during a flood event or heavy rainfall?</li> <li>• Help London to function during periods of drought</li> <li>• Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of flooding to property from surface water and fluvial flooding</li> <li>• The protection and management of CDAs</li> <li>• Managing of extreme weather events, including heat risk</li> </ul>	<ul style="list-style-type: none"> <li>• Protect London from climate change impacts?</li> <li>• Improve the micro-climate and ameliorate the impact of the heat island effect on local communities?</li> <li>• Help <b>the local area</b> to function during a flood event or heavy rainfall?</li> <li>• Help <b>the local area</b> function during periods of drought</li> <li>• Reduce impacts on groups more vulnerable to the effects of climate change e.g. older people are more vulnerable to excess heat?</li> </ul>
	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	<ul style="list-style-type: none"> <li>• Help London meet its emission targets?</li> <li>• Reduce transport's contribution to CO<sub>2</sub> emissions?</li> <li>• Reduce the built environment's contribution to CO<sub>2</sub> emissions?</li> <li>• Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions?</li> <li>• Promote the transition to a low carbon economy?</li> <li>• Reduce carbon emissions by shifting to more sustainable modes of transport?</li> </ul>	<ul style="list-style-type: none"> <li>• Energy use and demand in the LLDC management area</li> <li>• Energy efficacy and the production use of renewable or local energy</li> </ul>	<ul style="list-style-type: none"> <li>• Help London meet its emission targets?</li> <li>• Reduce transport's contribution to CO<sub>2</sub> emissions?</li> <li>• Reduce the built environment's contribution to CO<sub>2</sub> emissions?</li> <li>• Facilitate investment in green technologies, equipment and infrastructure that reduce GHG emissions?</li> <li>• Promote the transition to a low carbon economy?</li> <li>• Reduce carbon emissions by shifting to more sustainable modes of transport?</li> </ul>
<b>17. Energy use and supply</b>	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a	<ul style="list-style-type: none"> <li>• Increase the proportion of energy both purchased and generated from renewable and sustainable resources?</li> <li>• Contribute to the provision of smart and affordable energy system?</li> <li>• Reduce the demand and need for energy?</li> <li>• Promote generation of energy locally?</li> </ul>	<ul style="list-style-type: none"> <li>• Energy use and demand in the LLDC Planning Area.</li> <li>• High levels of fuel poverty</li> <li>• Energy efficacy and the production use of renewable or local energy</li> </ul>	<ul style="list-style-type: none"> <li>• Increase the proportion of energy both purchased and generated from renewable and sustainable resources?</li> <li>• Contribute to the provision of smart and affordable energy system?</li> <li>• Reduce the demand and need for energy?</li> <li>• Promote generation of energy locally?</li> </ul>

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	resilient smart and affordable energy system	<ul style="list-style-type: none"> <li>• Ensure that any supply shortages are addressed?</li> <li>• Promote and improve energy efficiency?</li> <li>• Promote the transition to a low carbon economy?</li> <li>• Reduce impacts of fuel poverty, particularly for vulnerable groups?</li> </ul>		<ul style="list-style-type: none"> <li>• Ensure that any supply shortages are addressed?</li> <li>• Promote and improve energy efficiency?</li> <li>• Promote the transition to a low carbon economy?</li> <li>• Reduce impacts of fuel poverty, particularly for vulnerable groups?</li> </ul>
<b>18. Water resources and quality</b>	To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system	<ul style="list-style-type: none"> <li>• Improve the quality of water bodies helping to meet the objectives of the Water Framework Directive?</li> <li>• Reduce discharges to surface and ground waters?</li> <li>• Support necessary improvements to the water systems infrastructure (water supply/ sewerage)?</li> <li>• Reduce abstraction from surface and ground water sources?</li> <li>• Reduce water consumption through the promotion of demand management?</li> <li>• Protect and enhance the character and use of London's riverscapes and waterways?</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of flooding to property from surface water and fluvial flooding</li> <li>• The protection and management of CDAs</li> <li>• The restriction of new development in flood-risk areas</li> <li>• The protection of drinking water quality during development</li> </ul>	<ul style="list-style-type: none"> <li>• Improve the quality of water bodies helping to meet the objectives of the Water Framework Directive?</li> <li>• Reduce discharges to surface and ground waters?</li> <li>• Support necessary improvements to the water systems infrastructure (water supply/ sewerage)?</li> <li>• Reduce abstraction from surface and ground water sources?</li> <li>• Reduce water consumption through the promotion of demand management?</li> </ul>
<b>19. Flood risk</b>	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	<ul style="list-style-type: none"> <li>• Minimise the risk of flooding from all sources of flooding to people, property, infrastructure?</li> <li>• Manage residual flood risks appropriately and avoid new flood risks?</li> <li>• Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk?</li> <li>• Promote sustainable urban drainage?</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of flooding to property from surface water and fluvial flooding</li> <li>• The protection and management of CDAs</li> <li>• The restriction of new development in flood-risk areas</li> </ul>	<ul style="list-style-type: none"> <li>• Minimise the risk of flooding from all sources of flooding to people, property, infrastructure?</li> <li>• Manage residual flood risks appropriately and avoid new flood risks?</li> <li>• Seek to minimise new development in areas prone to flood risk or mitigate the potential for such risk?</li> <li>• Promote sustainable urban drainage?</li> </ul>
<b>20. Natural Capital and Natural Environment</b>	To protect, connect and enhance London's natural capital including important habitats, species and landscapes) and the services and benefits it provides	<ul style="list-style-type: none"> <li>• Protect and enhance the character of local greenspaces?</li> <li>• Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest?</li> <li>• Help to acknowledge monetary value to natural capital of London</li> <li>• Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network?</li> <li>• Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance?</li> </ul>	<ul style="list-style-type: none"> <li>• The protection of key environmental assets within the LLDC boundary</li> <li>• Loss of biodiversity and reduced ecological resilience as a result of increased pressure from development</li> <li>• Areas deficient in nature surrounding the LLDC management area</li> </ul>	<ul style="list-style-type: none"> <li>• Protect and enhance the character of local greenspaces?</li> <li>• Bring nature closer to people, particularly in most urbanised parts of the city and improve access to areas of biodiversity interest?</li> <li>• Help to acknowledge monetary value to natural capital of London?</li> <li>• Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them enhancing the ecological function and carrying capacity of the greenspace network?</li> <li>• Avoid damage to sites, protected species and habitats, especially where there is a designation of international, national, regional or local importance?</li> </ul>

IIA Topic	IIA Objective	Key Guide Questions ( <b>SEA/SA, EQIA, HIA, CSIA</b> )	LLDC sustainability issues	LLDC IIA Guide Questions ( <b>SEA/SA, EQIA, HIA, CSIA</b> ) (Amended/new questions in bold)
		<ul style="list-style-type: none"> <li>• Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all?</li> <li>• Promote and support the function of the Blue Ribbon Network?</li> <li>• <b>Specifically address deficiencies in access to open space?</b></li> <li>• Create green spaces that are safe and accessible to all?</li> <li>• Promote sensory environments and play spaces?</li> </ul>		<ul style="list-style-type: none"> <li>• Promote, educate and raise awareness of the enjoyment and benefits of the natural environment to all?</li> <li>• <b>Specifically address deficiencies in access to open space?</b></li> <li>• Create green spaces that are safe and accessible to all?</li> <li>• Promote sensory environments and play spaces?</li> </ul>
<b>21. Historic Environment</b>	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	<ul style="list-style-type: none"> <li>• Conserve and enhance sites, features and areas of historical, archaeological and cultural value/potential?</li> <li>• Respect visual amenity?</li> <li>• Minimise the impact on the setting of heritage assets?</li> <li>• Promote improved accessibility for all within existing historic/cultural/archaeological environments and their landscapes through inclusive design and management?</li> <li>• Support and enhance cultural heritage?</li> </ul>	<ul style="list-style-type: none"> <li>• The protection of key historical assets within the LLDC management area</li> <li>• Retaining historical and cultural heritage within development and resisting redevelopment pressures</li> </ul>	<ul style="list-style-type: none"> <li>• Conserve and enhance sites, features and areas of historical, archaeological and cultural value/potential?</li> <li>• Respect visual amenity?</li> <li>• Minimise the impact on the setting of heritage assets?</li> <li>• Promote improved accessibility for all within existing historic/cultural/archaeological environments and their landscapes through inclusive design and management?</li> <li>• Support and enhance cultural heritage?</li> </ul>
<b>22. Geology and soils</b>	To conserve London's geodiversity and protect soils from development and over intensive use	<ul style="list-style-type: none"> <li>• Promote the use of brownfield land?</li> <li>• Prevent further soil degradation or erosion?</li> <li>• Restore degraded soil?</li> <li>• <b>Minimise the risk of health impacts through contamination?</b></li> <li>• Maximise the potential benefit of access to new employment and housing as a result of remediation?</li> </ul>	<ul style="list-style-type: none"> <li>• Level of remediation required for large areas of brownfield land</li> </ul>	<ul style="list-style-type: none"> <li>• Promote the use of brownfield land?</li> <li>• Prevent further soil degradation or erosion?</li> <li>• Maximise the potential benefit of access to new employment and housing as a result of remediation?</li> <li>• Restore degraded soil?</li> <li>• <b>Minimise the risk of health impacts through contamination?</b></li> </ul>
<b>23. Materials and waste</b>	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	<ul style="list-style-type: none"> <li>• Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling?</li> <li>• Maximise use of innovative waste management techniques including smart technology?</li> <li>• Help develop more efficient and sustainable freight transportation?</li> <li>• Minimise negative impacts of waste processing and disposal on vulnerable groups?</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing pressures on waste sites and infrastructure to meet demand from new development</li> <li>• Wasteful economy</li> <li>• Increasing disposal costs</li> <li>• Climate change impact from waste</li> <li>• A need to co-ordinate waste management across borough boundaries</li> <li>• Likely increase in waste arisings alongside population growth</li> </ul>	<ul style="list-style-type: none"> <li>• Promote the principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling?</li> <li>• Maximise use of innovative waste management techniques including smart technology?</li> <li>• Help develop more efficient and sustainable freight transportation?</li> <li>• Minimise negative impacts of waste processing and disposal on vulnerable groups?</li> </ul>
<b>24. Noise and vibration</b>	To minimise noise and vibration levels and disruption to people and	<ul style="list-style-type: none"> <li>• <b>Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects?</b></li> </ul>	<ul style="list-style-type: none"> <li>• Balance between the night-time economy and residential housing in mixed-use developments</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Reduce the number of people exposed to high levels of noise with the potential to cause annoyance, sleep disturbance or physiological effects?</b></li> </ul>

IIA Topic	IIA Objective	Key Guide Questions (SEA/SA, EQIA, HIA, CSIA)	LLDC sustainability issues	LLDC IIA Guide Questions (SEA/SA, EQIA, HIA, CSIA) (Amended/new questions in bold)
	communities across London and reduce inequalities in exposure	<ul style="list-style-type: none"> <li>• Help reduce actual noise levels and disturbances from noise?</li> <li>• Minimise and reduce road, rail and aviation noise and vibration levels and disruption?</li> <li>• Improve people’s access to quiet/ tranquil spaces?</li> <li>• Reduce night time noise in residential areas?</li> </ul>	<ul style="list-style-type: none"> <li>• Impact of noise levels on existing residents during large-scale redevelopment</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Help reduce actual noise levels and promote the agent of change principle to mitigate disturbances from existing noise?</b></li> <li>• Minimise and reduce road, rail and aviation noise and vibration levels and disruption?</li> <li>• Improve people’s access to quiet/ tranquil spaces?</li> <li>• Reduce night time noise in residential areas?</li> </ul>

## 7.2 Assessing the revised LLDC Local Plan

### 7.2.1 Local plan screening

Prior to assessing individual policies, a review of the changes to the 2016 LLDC Local Plan policies was undertaken. This screening of the policies identified those policies which had significantly changed and required reassessment within this IIA, and also those policies which were new. An overview of this screening is set out in Appendix B. The following policies and, where relevant, the associated options, have been assessed in the IIA.

- B.1: Location and maintenance of employment uses
- B.2: Thriving town, neighbourhood and local centres
- B.3: Creating vitality through interim uses
- H.1: Providing for and diversifying the housing mix
- H.2: Delivering affordable housing
- H.3: Meeting accommodation needs of older persons households
- H.4: Providing student accommodation
- H.5: Location of gypsy and traveller accommodation
- H.7: Shared living accommodation
- H.8: Innovative housing models
- Policy BN.4: Designing development
- Policy BN.5: Proposals for tall buildings
- Policy BN.11: Air Quality
- Policy BN.12: Noise
- Policy BN.17: Designing advertisements
- SP.4: Planning for and securing transport and utility infrastructure to support growth and convergence
- T.2: Transport improvements
- T.4: Managing development and its transport impacts to promote sustainable transport choices, facilitate local connectivity and prioritise pedestrians and cyclists
- T.5: Street network
- T.8: Parking and parking standards in new development
- T.9 Providing for pedestrians and cyclists
- S.1: Health and wellbeing
- S.2: Energy in new development
- S.6: Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure
- S.10: Flood risk
- S.11 Sustainable drainage measures and flood protections
- S.12 Resilience, safety and security
- SA2.4: Chobham farm
- Policy 3.1: Stratford Metropolitan Centre
- Policy 3.2: Stratford High Street Policy Area
- SA3.1: Stratford Town Centre West, SA3.2: Stratford Waterfront East, SA3.3: Stratford Waterfront West, SA3.4: Greater Carpenters District, SA3.5: Bridgewater Road, SA3.6: Rick Roberts Way
- Policy 4.2: Bringing forward new connections to serve new development
- SA4.4: Three Mills
- SA4.5: Bow Goods Yards (Bow East and West)

### 7.2.2 IIA process

The IIA will identify, describe and evaluate the likely significant effects of implementing Local Plan against the IIA objectives using the assessment guide questions. Any likely effects identified as a result of implementing the revised Local Plan will be described according to criteria presented within the SEA Regulations including a description of the probability, duration, frequency and reversibility of impacts.

Within each policy assessment, a description of the potential impacts has been included and the significance of the effect determined, taking into account the magnitude of the impact and sensitivity of the feature or receptor concerned. Where a significant effect was predicted, measures to mitigate the effects have been identified so that the potentially significant effects can be avoided or the magnitude of the impact reduced to a level where there would no longer be a significant effect.

In order to correctly code the policy effects, the following table was utilised. The following significance criteria have been developed to assess the effects of the plan options. Significant effects are those as defined in the SEA Directive, as in Table 16.

Where there is an effect could have a positive or negative effect, but the magnitude is uncertain a combination of symbols will be used (e.g. - /? signifies a potential minor adverse effect with a significant level of uncertainty associated with the predicted effect).

This assessment process was also used to initially appraise policy options. Within each preferred option appraisal, a summary has been provided of the different options. An appraisal of each preferred option is included in Section 8 and an appraisal of each non-selected option is located in Appendix D.

Table 16: IIA Framework scoring system

Significance of effect	Description of effect
++	Significant positive Likely to benefit a large part of the LLDC Planning Area and constituent boroughs, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor The extent of predicted beneficial effects is likely to be limited to small areas within the LLDC Planning Area or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
0	Neutral Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor negative Minor negative effects are likely to be limited to small areas within the LLDC Planning Area, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is effect is likely to be minor as is the magnitude of the predicted effect.
--	Significant negative Likely to affect the whole, or large areas the LLDC Planning Area and constituent boroughs, or a large number of people and receptors. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
?	Unknown This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
n/a	Not applicable This is applied to objectives that are clearly not affected by the option or policy being assessed.

## 8 Appraisal of policies

### 8.1 Policy B.1 Location and maintenance of employment uses

#### 8.1.1 Policy context

##### 8.1.1.1 Policy summary

This policy outlines the approach to the management of B-Class employment uses, setting a number of requirements including flexible spaces, safeguarding of land and the protection of floorspace/employment.

##### 8.1.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include references to intensification, consolidation and co-location of industrial units, in line with the new draft New London Plan (2018).

#### 8.1.1 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 17. Option 2a promotes the IIA objectives to the greatest degree by ensuring industrial land is protected and businesses are located in appropriate areas and alongside complementary industries. This encourages growth in the Planning Area and protects existing employment. A full appraisal of each non-selected option is located in Appendix D.

Table 17: Policy B.1 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1</b>	Do not amend as it is sound as existing.	This option is to not amend the policy from the 2015 LLDC Local Plan. This option would not be in line with the draft New London Plan, which includes a requirement to retain the capacity of industrial land. This protection of industrial land will protect local employment and industry in the LLDC Planning Area. Consolidating and co-location of industrial floorspace also ensures the protection of businesses, whilst allowing land to be released for further development. The assessment of this option is outlined in the 2015 LLDC Local Plan SA.
<b>Option 2a (preferred option)</b>	Update to reflect new approach to industrial land within the draft New London Plan to protect industrial floorspace capacity, making distinctions between the different	This is the preferred option. This option is to update the policy to protect industrial floorspace capacity, making distinctions between different types of employment clusters. This ensures employment land is protected and enhanced in the LLDC Planning area, supporting SMEs and larger strategic industries. The option also increases economic competitiveness in the LLDC area by directing growth to appropriate locations across the LLDC Planning Area, ensuring businesses and employment are located in

Options	Option overview	Option appraisal
	types of employment clusters.	appropriate areas and alongside complementary industries. The full assessment of this preferred option is outlined below.
<b>Option 2b</b>	Update to reflect the new approach to industrial land within the draft London Plan to protect industrial floorspace capacity with a unified approach to employment clusters.	This option is to update the policy to protect industrial floorspace capacity, but with a unified approach to employment clusters. This option would have similar benefits as Option 2a, encouraging growth in the LLDC Planning Area through the protection and enhancement of employment land. However, by not distinguishing employment clusters, this option may result in an uneven distribution of businesses and employment. Distinguishing the different types of employment clusters also ensures that businesses and industries are located alongside other businesses which complement each other and identifies areas for potential growth and intensification.

#### 8.1.2 Initial assessment

The policy aims to safe guard employment land to enable residents access to employment opportunities. It also ensures that existing businesses are accommodated for. Strengthening economic opportunities can encourage different groups to access local opportunities, including young people, people from Black, Asian and Minority Ethnic (BAME) backgrounds and people with disabilities, therefore also contributing to reducing poverty and social inclusion. This also encourages residents to develop a sense of ownership if employment and local business opportunities are open to all.

Evidence shows that good quality employment is positive for mental wellbeing and leads to better health outcomes, as well as reducing poverty. Greater access to clustered employment sites and a general mix of employment types will therefore positively contribute to reducing health inequalities and improving wellbeing.

The policy takes a proactive approach to residential development, supporting well-designed proposals for intensification, consolidation and co-location of uses. This includes the mitigation of adverse impacts on noise and air quality, which could help to enhance amenity for local communities. This could also contribute to improvements in London's overall housing supply by releasing land for future development. The policy also supports the re-use of buildings of value/heritage assets, in line with market demand and viability. This could facilitate the delivery of house building that meets the needs of the LLDC Planning Area.

The policy supports sustainable land use through the safeguarding of sites for specific land uses. It allocates land for Strategic Industrial Locations (SIL), Local SIL and other industrial sites in existing industrial areas and supporting intensification and an increase in job density in these areas. However, the policy also intends to maintain employment outside clusters and encourage the night time economy. This could lead to increased employment opportunities in more inaccessible locations, particularly at night.

The policy also supports good design as it specifically refers to the role of design in the provision of new employment spaces. The retention of industrial areas and promotion of multiple industries will help to conserve and enhance the character of the townscape and retain the spatial diversity of the communities. Design is considered in detail in terms of sustainability. This policy will directly improve the wider built environment and create a sense of vibrancy. Regeneration can also improve feelings of safety and security in an area.

The policy supports the protection and enhancement of employment space within the LLDC Planning Area, supporting both SMEs and larger strategic industries. This will promote economic growth and diversity in the area, underpinning the economic competitiveness of the area. The policy also helps to ensure London remains economically competitive by protecting existing employment land across all employment use classes and directing growth to appropriate locations across the LLDC Planning Area. The policy encourages the flexible provision of employment land and floorspace to meet the needs of a wide range of end users. This is beneficial in terms of encouraging business start-ups and supporting the growth of businesses, including SMEs, social enterprises and the voluntary/community sectors. Flexible provision may also support diversification by ensuring that locations are appealing to as wide a range of users as possible. Any growth in economic activity, including the development/enhancement of employment clusters, creates additional opportunities for residents to access employment.

The construction of employment units will also create economic benefits through construction employment, as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Ensuring the provision of flexible floorspace and the reuse of heritage assets can help to prolong the useful lifetime of built infrastructure, and avoid the need for additional construction, demolition and significant refurbishment. Subsequently, this can reduce construction, demolition and excavation waste. The co-location of businesses can also provide an opportunity for businesses to share resources. In certain cases, the surplus material or waste of one business can become the resource of another business, creating further resource benefits.

The policy text states that proposals, including conversions, shall be considered against the proximity of incompatible uses to the existing and proposed use. This is in keeping with the agent of change principle.

### 8.1.3 Recommendations

The policy could refer to accessible, adaptable and affordable units as part of any residential development, intensification or conversion to improve inclusivity.

The policy should seek to integrate land use and transport to support accessibility and safe travel to employment locations, particularly to support the night time economy. The supporting text also refers to 'valuable businesses'. More detail should be provided about how these are defined and whether these are existing businesses, or businesses of a type.

More detail about how business co-location can help in the sharing of surplus materials and resources is also required. This will help to ensure that waste reduction can be achieved in a more direct way.

### 8.1.4 LLDC response

The LLDC advised that it is not always appropriate to require workspace as part of residential developments, however the policy does encourage adaptable and flexibly designed accommodation. Encouragement of apprenticeships and vocational training is provided by Policy B.5 and a cross-reference to this policy is included. More detail has been included with reference to valuable businesses to define these as existing businesses and additional reference to the benefit of co-location with respect to shared materials and resources.

### 8.1.5 Residual assessment

The amendments made to the policy provide further clarity in relation to the definition of valuable businesses, however the overall effect of implementation will remain the same as noted in the initial appraisal.

### 8.1.6 HRA Implications

No likely significant effect at this stage.

Table 18: Policy B.1 Location and maintenance of employment uses

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				+	++			n/a	++	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	O	O
Medium Term		+				++	++			n/a	++	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	O
Long Term		+				++	++			n/a	++	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	++	O
Direct / Indirect		I				D	D			n/a	D	D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	D	D
Temporary / Permanent		P				P	P			n/a	P/T	P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global		L/G L				GL	L			n/a	L/G L W R	L/G L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	L	L
<b>EQIA</b>																									
Short Term	+	+	+	n/a	+	++	+	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Medium Term	+	+	+	n/a	+	++	+	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Long Term	+	+	+	n/a	+	++	+	+	n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Direct / Indirect	I	I	I	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P/T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Local / Greater London / Wider Region / Global	L/ G L	L/G L	L/G L	n/a	L/G L	L	L	L/G L	n/a	L/G L W R	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
<b>HIA</b>																									
Short Term	+		+		?		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Medium Term	+		+		?		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Long Term	+		+		?		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Direct / Indirect	I		I		I		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Local / Greater London / Wider Region / Global	L/ G L		L/G L		L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
<b>CSIA</b>																									
Short Term				n/a			+		n/a																
Medium Term				n/a			+		n/a																
Long Term				n/a			+		n/a																
Direct / Indirect				n/a			I		n/a																
Temporary / Permanent				n/a			P		n/a																
Local / Greater London / Wider Region / Global				n/a			L		n/a																

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.2 Policy B.2 Thriving town, neighbourhood and local centres

### 8.2.1 Policy context

#### 8.2.1.1 Policy summary

The policy describes how Centre uses shall be focused according to the scale, format and position in the retail hierarchy, and outlines how their identified function will be protected.

#### 8.2.1.2 Policy change

The policy has been amended since the 2015 LLDC Local Plan to include reference to the proximity of takeaways to schools, with emphasis on the night time economy and visitor infrastructure. This is in line with the draft New London Plan. Additionally, changes have been made to reflect the draft revised National Planning Policy Framework (NPPF).

### 8.2.2 Initial assessment

The policy supports the development of local and regional neighbourhood centres that offer retail and leisure opportunities for local residents and beyond. Residential developments will support the delivery of community facilities and open space, and enable residents to connect and develop a sense of community. New employment and services arising from retail centres will provide opportunities for the reduction of poverty and improved social inclusion. It will be the responsibility of each local borough to ensure that there is a promotion of culture, equality, fairness and respect for people.

Opportunities for people to choose a healthier lifestyle are encouraged by providing a wide range of retail uses and ensuring that the function of Centres are not compromised by over-concentration of non-A1 retail uses. This includes A5 (takeaway) facilities and sui generis e.g. betting shops. In addition, the introduction of buffer zones of 400 metres walking distance around areas such as schools will also provide younger people the opportunity to make healthier food choices.

The promotion of complementary residential development in all Centres, and the requirement for the agent of change principle to protect the interests of new communities, are supported within the policy. The supporting text states that the availability of community facilities and open space should be considered in relation to housing mix. These considerations will help to facilitate the delivery of housebuilding to meet the needs of Londoners, in line with housing quantum and mix. This could help to encourage a sense of community and improved amenity. This could also play a role in reducing homelessness and overcrowding. Ensuring high quality, fit-for-purpose housing can help to improve living conditions, mental health and security for residents and families across London.

The efficient and sustainable use of land is supported through the management of development and redevelopment in accordance with the retail hierarchy (Table 3 of the Local Plan). It promotes the maintenance of uses and frontages, supporting current land use within Centres and allowing edge-of-centre development to support the Metropolitan Centre where this is appropriate. This includes the maintenance and development of retail, residential, educational, community and open space land-uses in appropriate locations within and beyond Metropolitan Centres, and considers transport accessibility. It recognises that regeneration will bring about changes to frontages and the boundaries of town centres, but proposes that these will be reviewed in a later Local Plan, which is appropriate at this time.

Equality criteria are accounted for through the appropriate location of different land uses, including residential densities in accessible transport locations and the consideration of community facilities and open space in relation to housing mix. The policy supports flexible and adaptable spaces for various occupants and will promote regeneration. However, this may disadvantage current local residents in the future as growth in smaller areas may increase prices and price locals and renters out of the area. This could disproportionately affect those on low incomes, or other vulnerable persons.

The policy supports good design by taking a planning approach towards ensuring land uses are appropriately placed, which will improve the wider built environment, create a sense of vibrancy and retain the spatial diversity of communities. The density of residential units close to public transport hubs is appropriate to reduce the need for motorised transport, but encouragement of edge-of-centre development may increase private transport usage. The policy encourages the design of spaces to be flexible to maximise take-up.

The policy supports sustaining and growth of all retail centres across the LLDC Planning Area. The continued and expanded employment uses will generate both direct and indirect economic benefits. The policy provides a clear steer on the appropriate locations for growth and type of land uses, including the continued promotion of Stratford as a Metropolitan Centre, which will help to support London's role as national and international destination. Thriving centres will provide employment opportunities primarily within the service sector but also within other sectors. The retail hierarchy (Table 3) states that promoted uses include retail, food & drink, leisure, community, B-use classes and industry depending on the location of the centre. The policy clearly states that over concentrations of particular uses will be resisted and will therefore help to diversify the retail profile and consequently the local economy. The employment opportunities will be across all skills levels from low entry to managerial roles. Additional employment opportunities should be accessible to a wide spectrum of residents including long term unemployed and youth. Small-scale retail and office uses are promoted across all centres. The supporting text specifically states that floorspace should be flexible and adaptable to varied occupants and be suitable for interim uses where take-up is slow. Such provisions may help to encourage business start-ups, SMEs, social enterprise, voluntary and community sectors.

The policy does not make provision for green spaces, biodiversity or nature within thriving Centres. Objectives to enhance the natural environment, and acknowledge the green economy through natural capital and ecosystem services are therefore not

addressed in this policy. The supporting text does however outline how residential development in Centres should consider the availability of open space in relation to housing mix.

Increased development around historic assets may lead to better conservation and enhancement of the asset itself. Combined with new development in the form of shops or residential buildings, heritage assets which are conserved or enhanced may encourage more engagement from the local population. Additionally, edge of centre development can promote town centres, which act as the heart of communities, a place for community gathering and area of cultural preservation. Visitors to these sites will benefit from greater health, as well as a sense of place and identity.

Having a flexible and adaptable retail floorspace that is suitable for a variety of occupiers and is also available for interim uses, will help to prolong the lifetime of infrastructure assets, preventing the need for significant construction and demolition to take place, which in turn will reduce construction, demolition and excavation waste.

The supporting text of the policy states that the availability of community facilities and open space should be considered in relation to housing mix. Although it is not necessarily certain that the open space would be quiet/tranquil, this consideration in respect to open space has the potential to improve people's access to quiet/tranquil spaces.

### 8.2.3 Recommendations

The policy could consider how it will encourage a range of retail that attracts shoppers and customers with varying disability to avoid increase in the social and health inequalities gap. For example, the delivery of dementia friendly environments that consider noise levels, relaxing environments and public toilets and general public spaces will improve this policy.

The policy could reference the delivery of a range of housing types within town centres, including affordable options and accessible units to meet the needs of low-income communities and lesser mobile residents. Additional reference should be considered for high quality, well-designed housing, meeting a range of needs such as accessible, adaptable and family housing.

The policy could reference the natural environment, including the natural capital and ecosystem services it provides, as considerations for thriving Centres. Sensory environments and play spaces have potential to significantly enhance effects of a thriving centre on all residents. As well as addressing deficiencies in access to open space, the policy should also refer to areas of biodiversity interest within Centres (such as green infrastructure).

The policy could have a clearer link to waste reduction and material reuse, and a clearer focus on how to keep materials in use for as long as possible through flexible, adaptable spaces and interim space uses.

### 8.2.4 LLDC response

The LLDC advised that many of the recommendations are covered by other policies, such as BN.1, BN.5 and BN.6 which cover design matters. Area-based SPDs provide additional guidance on the suitability of housing types. Similarly, housing policies such as H.1, H.3 and H.8 address housing mix and specialist housing.

It is not appropriate to state the detailed level of specificity for retail units within each town centre however the policy allows for a diversity of uses, adaptable and flexibility to maximise function. Housing policy H.1 deals with housing mix and the diversity of provision.

Infrastructure policies address the Circular Economy, sustainable design and construction and waste and therefore additional reference is not required within this policy.

### 8.2.5 Residual assessment

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### 8.2.6 HRA Implications

No likely significant effect at this stage.

Table 19: Policy B.2 Thriving town, neighbourhood and local centres

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		?				++	+		n/a	++	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	O	+	n/a	O	O
Medium Term		?				++	+		n/a	++	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	O	+	n/a	+	O
Long Term		?				++	+		n/a	++	+	+	+	n/a	n/a	n/a	n/a	n/a	n/a	O	+	n/a	+	O
Direct / Indirect		D				D	I		n/a	D	D	D	I	n/a	n/a	n/a	n/a	n/a	n/a	D	I	n/a	D	D
Temporary / Permanent		P				P	P		n/a	P	P	P	P	n/a	n/a	n/a	n/a	n/a	n/a	P	P	n/a	T/P	P
Local / Greater London / Wider Region / Global		L/G L				L	L		n/a	L/ GL / WR	L	L/ GL / WR	L/G L	n/a	n/a	n/a	n/a	n/a	n/a	L/G L	L	n/a	L	L
<b>EQIA</b>																								
Short Term	O	+	O	n/a	+	++	O	?	+	+	?	n/a	O	n/a	n/a		n/a	n/a	n/a	O	O		n/a	n/a
Medium Term	O	+	O	n/a	+	++	O	?	+	+	?	n/a	O	n/a	n/a		n/a	n/a	n/a	O	O		n/a	n/a
Long Term	O	+	O	n/a	+	+	O	?	+	+	?	n/a	O	n/a	n/a		n/a	n/a	n/a	O	O		n/a	n/a
Direct / Indirect	D	D	D/I	n/a	D	D	I	D/I	I	D	D	n/a	I	n/a	n/a		n/a	n/a	n/a	D	I		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	P	P	P	n/a	P	n/a	n/a		n/a	n/a	n/a	P	P		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/ WR	L/G L	L/G K/ WR	n/a	L/ GL / WR	L	L	L/G L/ WR	L	L/ GL / WR	L	n/a	L	n/a	n/a		n/a	n/a	n/a	L/G L	L		n/a	n/a
<b>HIA</b>																								
Short Term	+		O		+		O		n/a	+				n/a	n/a		n/a	n/a		+	O	n/a		O
Medium Term	+		O		+		O		n/a	+				n/a	n/a		n/a	n/a		+	O	n/a		O
Long Term	+		O		+		O		n/a	+				n/a	n/a		n/a	n/a		+	O	n/a		O
Direct / Indirect	I		D/I		I		I		n/a	D				n/a	n/a		n/a	n/a		D	I	n/a		D
Temporary / Permanent	P		P		P		P		n/a	P				n/a	n/a		n/a	n/a		P	P	n/a		P
Local / Greater London / Wider Region / Global	L/G L/ WR		L/G K/ WR		L/ GL / WR		L		n/a	L				n/a	n/a		n/a	n/a		L/G L	L	n/a		L
<b>CSIA</b>																								
Short Term				n/a			O		n/a															
Medium Term				n/a			O		n/a															
Long Term				n/a			O		n/a															
Direct / Indirect				n/a			I		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.3 Policy B.3 Creating vitality through interim uses

### 8.3.1 Policy context

#### 8.3.1.1 Policy summary

This policy outlines the need to use vacant land set aside for long-term development for other interim uses, including housing, cultural and night-time economy activities. It sets a precedent to ensure that interim uses do not impact current business or residential communities and the deliverability of long-term development.

#### 8.3.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include interim use opportunities which contribute to housing or the night time economy. It also includes support for public realm improvements/creation.

### 8.3.2 Initial assessment

The policy offers the opportunity to enable residents to participate in decision making and to have a sense of ownership. It positively supports an inclusive agenda and will enable and encourage inclusion. It is important for this policy to ensure accessibility (both physical and non-physical) when engaging with community groups. The policy also offers the opportunity to enable residents to participate in physical activity, leisure and cultural activities in their local area. Community allotments and gardens are also associated with improving social cohesion and wellbeing.

The policy strongly supports social inclusion and the creation of an environment that could foster respect for people. The policy seeks to create a sense of ownership, participation in decisions and community development. It supports flexibility for new commercial units which can encourage business from different groups and residents. The policy also supports interim uses that promote sporting and leisure, cultural and creative industry, which can promote physical activity and in terms of allotments, enable the provision of locally grown healthy, affordable and quality produce.

This policy specifically highlights the impact derelict sites can have on a local area. Such spaces can attract anti-social behaviour which can lead to people feeling unsafe. Designing out crime, by encouraging vibrancy in the local area and increasing activity, can help to reduce overall levels of crime.

The policy does refer to supporting the night-time economy, and measures should be put in place to ensure the design of these interim-sites considers the importance of safety during the night-time, where people often feel most unsafe. Many key night-time economy activities include alcohol-consumption, which can increase the vulnerability of individuals and/or the number of crimes committed.

The policy seeks to ensure proposed interim uses contribute towards housing requirements, and will not impact upon the deliverability of the site allocations within the Local Plan. This could help to increase housing supply, and meet short term

housing needs, reducing issues such as overcrowding and homelessness until more permanent solutions can be provided. The provision of high quality, fit-for-purpose housing can improve the quality of life, mental health and security of residents and families. The policy also supports sustainable land use by allowing temporary development to occur on vacant land which is set aside for future development. This also promotes regeneration and provides benefits for communities in the short term, avoiding unsightly derelict and vacant plots by making appropriate use of them.

This policy encourages good design by ensuring plots earmarked for future development are brought into temporary use. This helps to create attractive mixed-use neighbourhoods, improving feelings of safety and creating sense of place and vibrancy. However, interim use of plots may not contribute to sustainable design and construction methods as they will not be permanent features.

The policy supports economic growth within the LLDC Planning Area and offers an opportunity to improve benefits in the short to medium term whilst longer term opportunities are realised. In addition, interim uses can contribute to increasing the vitality of an area, and therefore its regeneration, and encourage additional investment. Facilitating interim uses can offer opportunities to encourage business start-ups, SMEs, social enterprise, community and voluntary uses. Such uses, and users, can provide opportunities to create employment in deprived areas, particularly for disadvantaged groups with specific needs, and stimulate regeneration.

Interim 'green' proposals such as community allotments and gardens could benefit local air quality and help to reduce pollutant emissions. Using greenery to create a barrier between road emissions and public realm could be beneficial, particularly for more vulnerable groups in areas of poorer air quality. Achieving the air quality standards is however dependent upon baseline local air quality and level of improvement needed. Such green proposals could also lower surface and air temperatures by providing shade and cooling through evapotranspiration and minimising the impact of the urban heat island effect. The inclusion of green space could also help minimise surface water run off rates as natural infiltration can take place.

These proposed green spaces also have the potential to increase biodiversity in the most urbanised parts of city, providing access to, and increasing education of, the natural environment. However, the supporting text mentions the use of derelict sites and buildings, which could semi-natural habitats of recognised ecological value to species such as Black Redstart.

The reuse of vacant premises, the promotion of interim uses and community gardens and gardens, adhere to the principles of circular, sharing economy, which extends the useful lifetime of assets and provides means by which people can share resources. In this way, this policy supports reducing waste.

The policy promotes temporary interim uses of land including contributing towards housing requirements, leisure, cultural, night time economy or event-based. It is stated that this is however provided that the proposals can demonstrate that the uses will have no unacceptable adverse impacts on the amenity or function of the existing permanent business or residential community. Although the agent of change is not explicitly mentioned, the requirement to ensure there are no unacceptable adverse

impacts on the amenity or function of the existing permanent business or residential community is in line with the principle of the agent of change.

Noise is not explicitly mentioned in the Policy, but this should be considered in respect to impacting on amenity or function. The promoted land uses within the policy include leisure and community. The supporting text refers to 'green' proposals such as community allotments and gardens. This therefore has the potential to improve people's access to quiet/tranquil spaces.

### 8.3.3 Recommendations

It is recommended that the policy is expanded to include consultation with key local groups to support S106 and other decision-making processes, to enable interim uses to be effective for the equality groups. The policy could also include a statement of promoting equality and fairness for local and Greater London residents from every background to contribute and direct the different types of interim uses.

The supporting policy text could explicitly reference affordable and accessible housing delivery, to ensure a range of needs are met. It could also provide detail on 'follow on' accommodation and infrastructure that could help to replace temporary provision with more permanent solutions, where possible. The supporting policy text could also reference the need for high quality design in temporary housing solutions, considering accessible and affordable needs.

Some interim uses, particularly community allotments and gardens, may become an important part of established communities. The policy should consider the negative impact converting these assets during future development could have on communities.

The policy should also be strengthened to acknowledge the benefits of biodiversity on derelict and brownfield sites provide, and seek to utilise them for community, leisure or cultural activities. This policy also has a large potential to address the objective of reducing waste generation, material reuse and prolonging useful life of assets. This needs to be clearer within the policy by referring to circular economy principles and waste reduction.

The policy wording or supporting text could be amended to reference noise in respect to adverse impacts on amenity or function of existing permanent business or residential community.

### 8.3.4 Cumulative

This policy closely aligns with others relating to economic growth and housing development by seeking to use vacant land for interim-uses, ensuring that land is not left derelict and its potential is realised. It is also supported by good design, ensuring interim-uses create vibrant and attractive sites.

### 8.3.5 LLDC response

The LLDC advised that an additional reference will be included to reference the role of local consultation and specifically equality of access, as well as affordability and

types of housing supply encouraged as interim uses. Other Local Plan policies cover noise, SuDs and waste matters therefore specific mention within this policy is not considered necessary.

### 8.3.6 Residual assessment

The amendments made to the policy provide further clarity in relation to consultation, however the overall effect of implementation will remain the same as noted in the initial appraisal.

### 8.3.7 HRA Implications

No likely significant effect at this stage.

Table 20: Policy B.3 Creating vitality through interim uses

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				++	+		n/a	+	+	n/a	n/a	+	n/a	+	n/a	n/a	+	+	n/a	n/a	++	+
Medium Term		++				+	+		n/a	+	+	n/a	n/a	O	n/a	+	n/a	n/a	+	+	n/a	n/a	++	+
Long Term		++				O	+		n/a	+	O	n/a	n/a	O	n/a	+	n/a	n/a	+	+	n/a	n/a	++	+
Direct / Indirect		D & I				D	D		n/a	D	D	n/a	n/a	D	n/a	D	n/a	n/a	D	I	n/a	n/a	D	D
Temporary / Permanent		T				T	T		n/a	T	T	n/a	n/a	T	n/a	P	n/a	n/a	P	P	n/a	n/a	T/P	T
Local / Greater London / Wider Region / Global		L				L	L		n/a	L/ GL	L	n/a	n/a	L	n/a	W R	n/a	n/a	L	L	n/a	n/a	L/ GL	L
<b>EQIA</b>																								
Short Term	++	++	+	+	+	++	++	n/a	n/a	+	+	n/a	n/a	+	n/a		n/a	n/a	+	+	n/a		n/a	n/a
Medium Term	++	++	+	+	+	+	+	n/a	n/a	+	+	n/a	n/a	O	n/a		n/a	n/a	+	+	n/a		n/a	n/a
Long Term	++	++	+	+	O	O	+	n/a	n/a	+	O	n/a	n/a	O	n/a		n/a	n/a	+	+	n/a		n/a	n/a
Direct / Indirect	D & I	D & I	D & I	D	I	I	D	n/a	n/a	D	D	n/a	n/a	D	n/a		n/a	n/a	D	I	n/a		n/a	n/a
Temporary / Permanent	T	T	T	T	T	T	T	n/a	n/a	T	T	n/a	n/a	T	n/a		n/a	n/a	P	P	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L/ GL	L/ GL	L	L	L	L	n/a	n/a	L/ GL	L	n/a	n/a	L	n/a		n/a	n/a	L	L	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	++		+		+		++		n/a	+				+	+		n/a	n/a		+	n/a	n/a		O
Medium Term	++		+		+		+		n/a	+				O	+		n/a	n/a		+	n/a	n/a		O
Long Term	++		+		O		+		n/a	+				O	+		n/a	n/a		+	n/a	n/a		O
Direct / Indirect	D & I		D & I		I		D		n/a	D				D	I		n/a	n/a		D	n/a	n/a		D
Temporary / Permanent	T		T		T		T		n/a	T				T	P		n/a	n/a		P	n/a	n/a		T
Local / Greater London / Wider Region / Global	L		L/ GL		L/ GL /		L		n/a	L				L	L		n/a	n/a		L/ Gl	n/a	n/a		L
<b>CSIA</b>																								
Short Term				+			++		n/a															
Medium Term				+			+		n/a															
Long Term				+			+		n/a															
Direct / Indirect				D			D		n/a															
Temporary / Permanent				T			T		n/a															
Local / Greater London / Wider Region / Global				L			L		n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.4 Policy H.1: Providing for and diversifying the housing mix

### 8.4.1 Policy context

#### 8.4.1.1 Policy summary

This policy outlines the approach to diversifying the housing market within the LLDC Planning Area. It outlines the need to use a range of sites, including small sites, to deliver a mix of housing size and tenure (including build-to-rent). This mix should support the creation of a diverse community.

#### 8.4.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include reference to small sites and build-to-rent housing requirements in line with the new Draft London Plan (2018).

### 8.4.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 21. Option 3b promotes the IIA objectives to the greatest degree by ensuring it complies with the draft New London Plan (2018) and also considers build-to-rent accommodation and the delivery of specific housing types, meeting the housing needs of the LLDC Planning Area. A full appraisal of each non-selected option is located in Appendix D.

Table 21: Policy H.1 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1a</b>	To update from the Housing Requirements Study (HRS) evidence requirements on housing mix requirements	<p>This option updates the policy in line with the 2018 HRS, drawing on relevant evidence to secure an appropriate mix of housing and accommodation types. This targeted approach will support the delivery of a range of housing by size, form, tenure and typology in line with identified needs.</p> <p>Providing for a range of different forms of residential accommodation is essential in creating sustainable, mixed and inclusive communities, as well as reducing risks of overcrowding and homelessness.</p>
<b>Option 1b</b>	As 1a and the London Plan direction for housing delivery including small sites and reference to design codes	<p>The option is to update the policy in line with both the 2018 HRS and the Draft New London Plan. This targeted approach will support the delivery of a range of housing by size, form, tenure and typology in line with identified needs.</p> <p>Providing for a range of different forms of residential accommodation is essential in creating sustainable, mixed and inclusive communities, as well as reducing risks of overcrowding and homelessness.</p> <p>By also including small sites and reference to design codes in line with the Draft New London Plan, this option increases the range of</p>

Options	Option overview	Option appraisal
		land available for development and emphasizes the contribution of small sites to overall housing delivery. This in turn offers the potential for smaller construction firms to contribute to growth. The reference to design codes will help to bring forward development and ensure it delivers high quality design and place-making.
<b>Option 2a</b>	To update from HRS evidence requirements on housing mix requirements with increased specificity	This option updates the policy in line with the 2018 HRS. This option includes increased specificity on housing requirements, including the delivery of affordable two and three-bedroom homes and two-bedroom market homes, ensuring that local needs are met. This will support the delivery of an appropriate mix of housing and accommodation types in the LLDC Planning Area, reducing wider risks of homelessness and overcrowding. It will ensure the delivery of vital infrastructure and promote growth in the LLDC Planning Area.
<b>Option 2b</b>	As 2a and the London Plan direction for housing delivery including small sites and reference to design codes	<p>The option updates the policy in line with the 2018 HRS and the Draft New London Plan. This option includes increased specificity on housing requirements, including the delivery of affordable two and three-bedroom homes and two-bedroom market homes, ensuring that local needs are met. This will support the delivery of an appropriate mix of housing and accommodation types in the LLDC Planning Area, reducing wider risks of homelessness and overcrowding.</p> <p>This option additionally includes reference to small sites and design codes in line with the Draft New London plan. By including small sites, this option increases the range of land available for development and emphasizes the contribution of small sites to overall housing delivery. This in turn offers the potential for smaller construction firms to contribute to growth. The reference to design codes will help to bring forward development and ensure it delivers high quality design and place-making.</p>
<b>Option 3a</b>	As 2a and the inclusion of build-to-rent specifically	<p>This option updates the policy in line with the 2018 HRS. This option includes increased specificity on housing requirements, including the delivery of affordable two and three-bedroom homes and two-bedroom market homes, ensuring that local needs are met. This will support the delivery of an appropriate mix of housing and accommodation types in the LLDC Planning Area, reducing wider risks of homelessness and overcrowding. It will ensure the delivery of vital infrastructure and promote growth in the LLDC Planning Area.</p> <p>It additionally includes a requirement to include built to rent schemes, recognizing the increasing role the private rental sector plays in the housing market, and the need for greater certainty, tenancy flexibility and long-term management. This policy option supports high quality private sector accommodation that meets the needs of the rental market, and supports the longevity and cohesion of local communities.</p>
<b>Option 3b (preferred option)</b>	As 2b and the inclusion of build-to-rent specifically	This is the preferred option. This option updates the policy in line with the 2018 HRS, the Draft New London Plan and sets out a requirement to deliver build-to-rent accommodation. This option includes increased specificity on housing requirements, including the delivery of affordable two and three-bedroom homes and two-bedroom market homes, ensuring that local needs are met. This will support the delivery of an appropriate mix of housing and accommodation types in the LLDC Planning Area, reducing wider risks of homelessness and

Options	Option overview	Option appraisal
		<p>overcrowding.</p> <p>This option also includes reference to small sites and design codes in line with the Draft New London plan. By including small sites, this option increases the range of land available for development and emphasises the contribution of small sites to overall housing delivery. The reference to design codes will help to bring forward development and ensure it delivers high quality design and place-making.</p> <p>It additionally includes a requirement to include built to rent schemes, recognizing the increasing role the private rental sector plays in the housing market, and the need for greater certainty, tenancy flexibility and long-term management. This policy option supports high quality private sector accommodation that meets the needs of the rental market, and supports the longevity and cohesion of local communities.</p> <p>The full assessment of this preferred option is outlined below.</p>

### 8.4.3 Initial assessment

The policy strongly supports the diversity of housing mix and build-to-rent provision where a strategic need for low cost rented properties is required. This will contribute positively to reducing poverty and social exclusion. It focuses on potential residents that require affordable two and three-bedroom homes and two-bedroom market homes and also delivers rental properties. Specifying the need to certain sized homes and build-to-rent properties enables the delivery of housing that supports the needs of residents in the LLDC Planning Area. This supports the creation of mixed and inclusive neighbourhoods by delivering a mix of housing size and tenure types. This policy is likely to increase the range and affordability of housing, and promote accessible and adaptable homes.

The policy will enable low income households to access a variety of housing choices including rental properties. Developments which are well-designed and encourage wider development will support access to health and social care facilities as well as other public and local services. The build-to-rent sector, where required to utilise unified ownership and management structures, will also support long term secured tenancies, thereby improving housing security.

The policy supports the diversification of housing provision by securing an appropriate mix of housing and accommodation types to meet identified needs. This includes supporting high quality design, and build-to-rent options which could improve tenure security and allow residents to remain in the area. The provision of inclusive, well-designed housing is likely to play a role in reducing homelessness and overcrowding, and contribute to a range of positive health outcomes.

The policy supports sustainable land use by promoting regeneration, encouraged through development on brownfield land, which can provide benefits for existing communities in terms of social infrastructure provision. The support for long-term ownership through build-to-rent schemes will benefit residents and help create lasting

communities. The inclusion of small sites in line with the draft New London Plan also increases the land available for development.

The policy supports a mix of housing units, including family housing. The supporting texts goes further to suggest that family housing could be designed to support home working practices. The facilitation of home working may help to deliver economic growth, diversify the economy, create opportunities for unemployed, encourage business start-ups/SMEs and support social enterprise, voluntary and community sectors.

The construction of additional housing will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. The addition of small sites also increases opportunities for smaller construction firms to contribute to development in the LLDC Planning Area. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile. Although the policy does not directly address supporting infrastructure, the consideration of existing and future infrastructure requirements could be considered as part of the evidence base to support appropriate housing delivery. The limited consideration of infrastructure could adversely impact on housing delivery, and result in unsustainable growth.

In referring to the brownfield register to achieve housing need, the policy promotes the redevelopment of brownfield sites at a strategic level, thereby enhancing the site through remediation. Redevelopment of brownfield sites will need to address ground contamination risks to human health. Appropriate remediation and mitigation of risks will lead to an improvement in the site condition.

The policy relates to diversifying the range of housing provision. The supporting text requires justification for the need for the development where it is considered that a proposal could harm the residential amenity, character or function of the area. This does not explicitly refer to noise however it ensures that where there is potential to harm amenity if it is justified. This would apply in particular to construction phases of large residential development.

### 8.4.4 Recommendations

It was recommended that consideration is given to expanding the references to housing design supporting home working practices to apply to all housing types, not just family housing.

The policy could consider appropriate social and physical infrastructure as part of the evidence base to support residential development. This will help to promote sustainable and balanced growth.

This policy should consider the impact of any new development on the quality and condition of the historic environment and where possible should seek to enhance the historic environment through design principles.

The policy refers to the brownfield register, but does not necessarily promote the redevelopment of brownfield sites over others of equivalent strategic merit.

#### **8.4.5 Cumulative**

This policy supports more specific housing policies which cover a certain type of housing (such as shared accommodation or student accommodation), outlining the broad approach to provide a diverse mix of housing in the LLDC Planning Area. The provision of housing will also support economic growth and development policies.

#### **8.4.6 LLDC response**

The LLDC advised that as other Local Plan policies reference impacts on the historic environment and skills and apprenticeship schemes, a specific reference is not considered necessary within this policy. Infrastructure policies also take into account the population growth impacting on housing policies therefore form the same evidence base. Specific reference will be included to reinforce the NPPF principle of promotion of brownfield sites.

#### **8.4.7 Residual assessment**

The amendments made to the policy provide further clarity in relation to the promotion of brownfield sites, however the overall effect of implementation will remain the same as noted in the initial appraisal.

#### **8.4.8 HRA Implications**

No likely significant effect at this stage.

Table 22: Policy H.1: Providing for and diversifying the housing mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				++	+		n/a	+	O	n/a	O	+	n/a	O								
Medium Term		++				++	+		n/a	+	-	n/a	O	+	n/a	O								
Long Term		++				++	+		n/a	+	-	n/a	O	+	n/a	O								
Direct / Indirect		D				D	I		n/a	D	D	n/a	I	D	n/a	D								
Temporary / Permanent		P				P	P		n/a	P, T	P	n/a	P	P	n/a	P								
Local / Greater London / Wider Region / Global		L				GL	GL		n/a	L	L/ GL	n/a	L, GL	L	n/a	L								
<b>EQIA</b>																								
Short Term	++	++	++	n/a	++	++	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	++	n/a	++	++	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	++	++	n/a	++	++	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P, T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/ GL/ W/ R	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		+		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Medium Term	+		+		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Long Term	+		+		++		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Direct / Indirect	D		D		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	D		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	P		n/a
Local / Greater London / Wider Region / Global	L		L		L/ GL		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	L		n/a
<b>CSIA</b>																								
Short Term				?			+		n/a															
Medium Term				?			+		n/a															
Long Term				?			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/ P			P		n/a															
Local / Greater London / Wider Region / Global				L/ GL			L		n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.5 Policy H.2: Delivering affordable housing

### 8.5.1 Policy context

#### 8.5.1.1 Policy summary

This policy supports the delivery of affordable housing on sites of ten or more units, or over 1000sqm combined floorspace. This is based on affordable housing targets set out in SP.2 Maximising housing and infrastructure provision within new neighbourhoods. The policy allows for the provision of off-site affordable housing and sets out criteria for where this is allowed.

#### 8.5.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include specific requirements for the provision of affordable housing, in line with the draft New London Plan (2017).

### 8.5.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 23. Option 2a promotes the IIA objectives to the greatest degree by ensuring it complies with the draft New London Plan and the affordable housing delivery viability tested routes, it also includes build-to-rent provision and specifies the delivery of both affordable and intermediate housing. This will ensure the specific housing needs of LLDC Planning Area, delivering a range of housing types and tenures to meet different requirements. A full appraisal of each non-selected option is located in Appendix D.

Table 23: Policy H.2 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1a</b>	Update to reflect draft London Plan requirements and within AHV SPG including by habitable room setting out local requirement for the 40% based upon HRS information	This option updates the policy to include the Draft New London Plan requirements and affordable housing viability tested routes. It also includes HRS requirements for the delivery of 60% low cost rented and 40% intermediate housing in developments of 10 or more units or over 1000sqm.  This will maximize affordable housing delivery and help to meet London's diverse accommodation needs by offering a greater range of options. The increase in affordable housing supply could also play a role in reducing homelessness and overcrowding, supporting a range of positive health outcomes.
<b>Option 1b</b>	Update to reflect draft London Plan requirements and within AHV	This option is to include the Draft New London Plan requirements and affordable housing viability tested routes. It however does not include a reference to the percentage of affordable housing breakdown. A breakdown between low cost rented and intermediate allows the policy to meet wider need by

Options	Option overview	Option appraisal
	SPG including by habitable room utilising HRS housing requirements information	increasing the delivery of a range of affordable homes. Intermediate housing may support the younger population in the LLDC Planning Area through the provision of lower income homes.
<b>Option 2a (preferred option)</b>	Option 2a- as 1a plus reference to Build-to-rent (see Policy H.7 below)	This is the preferred option. This option updates the policy to include the draft New London Plan requirements and affordable housing viability tested routes. It also includes HRS requirements for the delivery of 60% low cost rented and 40% intermediate housing in developments of 10 or more units or over 1000sqm. This option goes further to also include reference to build-to-rent accommodation. This manages the increasing demand for rental accommodation, further increasing the range of affordable housing this policy can deliver. The full assessment of this preferred option is outlined below.
<b>Option 2b</b>	Option 2b- as 1b plus reference to Build-to-rent (see Policy H.7 below)	This option is in line with the preferred option by including the build-to-rent sector, but it does not distinguish between low income and intermediate affordable housing delivery. As mentioned above, this would limit the policy and potentially not meet local demand by not ensuring the delivery of different types of affordable homes.

### 8.5.3 Initial assessment

This policy supports the provision of affordable housing in line with AHV SPG and HRS housing requirements, including the delivery of 60% low cost rented and 40% intermediate housing. The increase in affordable housing supply and build-to-rent options will help to meet London's diverse accommodation needs by offering a greater range of options. The increase in affordable housing supply could also play a role in reducing homelessness and overcrowding, supporting a range of positive health outcomes.

By identifying targets for intermediate and low-cost housing delivery, the policy is managing local requirements and delivering a wider range of homes. Intermediate housing may support the younger population in the LLDC Planning area through the provision of lower income homes. This creates resilient communities and enables supports a number of groups including young care leavers, parents in temporary accommodation and those in receipt of income benefits, to benefit from lower than market level rents (discounted rents) and London affordable rents.

The policy supports the sustainable use of land by ensuring that affordable housing is places in locations with housing need and can provide opportunities to integrate with and enhance the existing community.

The construction of affordable housing units will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the

employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy supports the development of an inclusive mixed-use neighbourhood and the provision of affordable housing. Depending on the nature and age of the historic environment, the housing may affect the setting of the historic environment and/or any protected views. However, mitigation measures may be put in place to minimise the impacts and design measures may ensure aesthetic consistency with the current environment. The impact of this policy on the historic environment very much depends on the significance of the cultural heritage where the development is scheduled to be built.

This policy supports the development of an inclusive mixed-use neighbourhood and the provision of affordable housing. Depending on the nature and age of the historic environment, the housing may affect the setting of the historic environment and/or any protected views. However, mitigation measures may be put in place to minimise the impacts and design measures may ensure aesthetic consistency with the current environment. The impact of this policy on the historic environment very much depends on the significance of the cultural heritage where the development is scheduled to be built.

#### **8.5.4 Recommendations**

The policy could reference high quality design and provision of appropriate supporting facilities such as amenity space. The policy could also refer to adaptable and inclusive options, to ensure the needs of lesser mobile groups are met.

#### **8.5.5 Cumulative**

This policy closely aligns with wider housing policies, ensuring the delivery of a range of affordable housing. This also supports wider development and economic growth policies as it ensures access to housing which a range of individuals can afford.

#### **8.5.6 LLDC response**

The LLDC advised that other Local Plan policies also reference design and inclusive design and impacts on the historic environment therefore it is not considered necessary to specifically reference within this policy.

#### **8.5.7 Residual assessment**

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

#### **8.5.8 HRA Implications**

No likely significant effect at this stage.

Table 24: Policy H.2: Delivering affordable housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Medium Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Long Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Direct / Indirect		D/I				n/a	D		n/a	D	D	n/a	I	n/a	n/a	n/a								
Temporary / Permanent		P				n/a	P		n/a	T	P	n/a	P	n/a	n/a	n/a								
Local / Greater London / Wider Region / Global		L/G L				n/a	L		n/a	L, GL, WR	L/G L	n/a	L/G L	n/a	n/a	n/a								
<b>EQIA</b>																								
Short Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D/I	I	D/I	n/a	D	D	D	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	n/a	L/G L/WR	L	L	L/G L	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	+		++		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	+		++		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	I		D/I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L		L/G L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			O		n/a															
Medium Term				n/a			O		n/a															
Long Term				n/a			O		n/a															
Direct / Indirect				n/a			D		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.6 Policy H.3: Meeting accommodation needs of older persons households

### 8.6.1 Policy context

#### 8.6.1.1 Policy summary

This policy protects existing older persons housing, prohibiting the loss of this housing type unless the accommodation is of a poor standard. It ensures new older persons housing is in well-connected areas, is of an inclusive and accessible design, meets local housing need and does not compromise the delivery of non-specialist housing.

#### 8.6.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include reference to social infrastructure and inclusivity.

### 8.6.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 25. Option 2a promotes the IIA objectives to the greatest degree by ensuring it complies with the draft New London Plan. It specifies the need to provide C2 and C3 accommodation, ensuring the specific older persons housing needs of the LLDC Planning Area are fully met. A full appraisal of each non-selected option is located in Appendix D.

Table 25: Policy H.3 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 2</b>	Update to reflect draft London Plan policy H15	<p>This option updates the policy in line with Policy H15 Specialised Older Persons Housing in the Draft New London Plan, supporting a wider need to deliver appropriate accommodation in line with demographic change.</p> <p>The average age of residents in the LLDC is generally younger than other areas of London, however there is a strategic London-wide need for specialist accommodation to meet the needs of older Londoners. This option however is very high level and does not meet the specific needs of the LLDC Planning Area.</p>
<b>Option 2a (preferred option)</b>	Update to reflect draft London Plan policy H15 and include updated C2/C3 distinctions	<p>This is the preferred option. This option updates the policy in line with Policy H15 Specialised Older Persons Housing, supporting a wider need to deliver older persons housing to meet growing demands in line with demographic change.</p> <p>However, this option goes further to reference C2/C3 distinctions, identifying the need to deliver self-contained/extra care C3 accommodation and also C2 housing in the form of residential care homes. This ensures that the policy supports a broader definition of ageing population, acknowledging that the LLDC Planning Area has a younger population and therefore there is greater demand for accommodation with lower levels of</p>

Options	Option overview	Option appraisal
		care. This option will deliver in line with local housing needs and support wider health and social benefits, creating mixed and inclusive communities. The full assessment of this preferred option is outlined below.
<b>Option 2b</b>	as 2a plus other/new forms of accommodation to meet needs	<p>This option updates the policy in line with Policy H15 Specialised Older Persons Housing, supporting a wider need to deliver older persons housing to meet growing demands in line with demographic change.</p> <p>This includes reference to C2/C3 distinctions, identifying the need to deliver self-contained/extra care C3 accommodation and also C2 housing in the form of residential care homes.</p> <p>Additionally, this option supports the delivery of other forms of accommodation to ensure the delivery of a range of housing options. Due to the generally younger population in the LLDC Planning Area, local needs would be met primarily through C2/C3 as set out in the preferred option. Although this option could accommodate more specialised housing needs, the preferred options supports a more targeted approach to address existing identified need.</p>

### 8.6.3 Initial assessment

The policy supports the delivery of high quality older persons' accommodation to meet strategic and local needs for specialist types of provision, including affordable options. This includes proximity to transport modes, social infrastructure and centres, along with ensuring inclusive and accessible design. This will help to meet the diverse housing needs of London, and support resident amenity and community cohesion. The policy specifies the need to deliver C2/C3 accommodation, identifying the need to deliver self-contained/extra care C3 accommodation and also C2 housing in the form of residential care homes. This ensures that the policy supports a broader definition of the aging population, acknowledging that the LLDC planning area has a younger population and therefore a greater demand with lower levels of care.

The provision of older persons accommodation, particularly C2 accommodation, includes element of care related employment. Such development will therefore contribute to increased productivity, economic diversification and offer an opportunity to reduce unemployment. The construction of these units will also create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

The policy supports the provision of appropriate social and physical infrastructure to support the delivery of older persons' accommodation. This includes proximity to transport modes, social infrastructure, and local centres, along with inclusive design. This will improve accessibility and enhance opportunities for elderly people to engage

with cultural venues. This has a multitude of positive benefits including enhanced life-satisfaction (and associated health and wellbeing), greater independence for the elderly generation, and social integration between the elderly and the wider community.

The policy supports the provision of appropriate social and physical infrastructure to support the delivery of older persons' accommodation. As a result, there will be improved social infrastructure, transport modes and centres and thereby greater accessibility and connectivity for the elderly population to cultural activities. Whilst this does not present any strategies to directly enhance participation to cultural activities, participation in cultural activities will not reduce because of the policy.

#### **8.6.4 Recommendations**

It is recommended that the policy text is expanded to include issues specific to older persons, such as physical disabilities, end of life care and dementia, for example ensuring that new specialist housing includes Dementia Friendly Environments and uses the Dementia Friendly Environment Checklist

Further strategies to support this objective could include those at a community-level to enhance social integration between the existing community and the new elderly population, such as local community cultural events and festivities.

#### **8.6.5 Cumulative**

This policy is supported by wider housing policies, delivering a specific type of specialist housing (older persons housing) to support wider need in the LLDC Planning Area and across London.

#### **8.6.6 LLDC response**

The LLDC advises that additional references to dementia care to be included within the policy supporting text. Apprenticeships and training adequately are covered in other policies (B.5).

#### **8.6.7 Residual assessment**

The amendments made to the policy provide further clarity in relation to dementia care, however the overall effect of implementation will remain the same as noted in the initial appraisal.

#### **8.6.8 HRA Implications**

No likely significant effects at this stage.

Table 26: Policy H.3: Meeting accommodation needs of older persons households

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				n/a	n/a		O	+	+	n/a	+	n/a	O	n/a	n/a	n/a						
Medium Term		++				n/a	n/a		O	+	+	n/a	+	n/a	O	n/a	n/a	n/a						
Long Term		++				n/a	n/a		O	+	+	n/a	+	n/a	O	n/a	n/a	n/a						
Direct / Indirect		D				n/a	n/a		I	D	D	n/a	I	n/a	I	n/a	n/a	n/a						
Temporary / Permanent		P				n/a	n/a		P	P, T	P	n/a	P, T	n/a	P	n/a	n/a	n/a						
Local / Greater London / Wider Region / Global		L/G L/ WR				n/a	n/a		L	L, GL, WR	L/G L	n/a	L	n/a	L	n/a	n/a	n/a						
<b>EQIA</b>																								
Short Term	++	+	+	n/a	++	n/a	+	n/a	O	+	+	n/a	O	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	+	+	n/a	++	n/a	+	n/a	O	+	+	n/a	O	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	+	+	n/a	++	n/a	+	n/a	O	+	+	n/a	O	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	I	I	n/a	D	n/a	D	n/a	I	D	D	n/a	I	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	n/a	P	n/a	P	P, T	P	n/a	P, T	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/ WR	L/G L/ WR	L/G L/ WR	n/a	L/G L/ WR	n/a	L	n/a	L	L, GL, WR	L	n/a	L	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	I		I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/ WR		L/G L/ WR		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			+		n/a															
Medium Term				n/a			+		n/a															
Long Term				n/a			+		n/a															
Direct / Indirect				n/a			D		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.7 Policy H.4: Providing student accommodation

### 8.7.1 Policy context

#### 8.7.1.1 Policy summary

This policy outlines the approach to purpose-built student accommodation in the LLDC Planning Area to support wider higher education needs. It ensures accommodation is provided in well-connected areas and the accommodation is mixed and affordable.

#### 8.7.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include the new target of 35% provision of affordable student accommodation, in line with the draft New London Plan (2018).

### 8.7.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 27. Option 2 promotes the IIA objectives to the greatest degree as it complies with the draft New London Plan and identifies specific locations for student accommodation to ensure student housing delivery is in appropriate and well-connected areas. A full appraisal of each non-selected option is located in Appendix D.

Table 27: Policy H.4 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1</b>	To reflect draft London Plan considerations	This option is to update the policy in line with the requirements of the New London Plan. It sets out a need to deliver new student accommodation and that purpose-built student accommodation can contribute to overall housing supply, including affordable housing. This will promote accessible and affordable housing options to meet the needs of the student population and help to improve local amenity. However, this option does not include locational preferences which help to ensure that student housing is delivered where there is demand.
<b>Option 2 (preferred option)</b>	To reflect draft London Plan considerations with locational preferences	This is the preferred option. This option is to update the policy in line with the requirements of the Draft New London Plan, as set out above. However, it also includes a reference to specific locations, particularly the Metropolitan Centre and edge of center sites, where there is appropriate public transport, education institutes and opportunities to create more vibrant neighbourhoods. This ensures that educational institutes, student populations and existing communities all benefit from the provision of PBSA. The full assessment of this preferred option is outlined below.

### 8.7.3 Initial assessment

The policy supports the objective of making London an inclusive city as higher education institutes (HEI) provide opportunities for students from various backgrounds and areas to be part of a local community and area. The policy also supports the appropriate provision of well-connected student accommodation to meet local and strategic needs, identifying the Metropolitan Centre and edge of centre sites as viable locations. This includes ensuring accommodation is easily accessible by walking, cycling and public transport infrastructure, and that suitable transport and healthcare provision is available to the student population. This supports equity of access to key services and opportunities.

Student accommodation supports the increase in local spending power, night time economy and the general character of an area. The provision of affordable housing options will also contribute to providing opportunities for residents to develop a sense of community. The policy also supports the appropriate provision of well-connected student accommodation to meet local and strategic needs. This includes the provision of affordable options, available for long-term use. This could promote accessible and affordable housing options to meet the needs of the student population, and help to improve local amenity. This could also help to reduce overcrowding and homelessness amongst the student population, and promote a range of health benefits.

The policy supports good design by seeking to ensure that new PBSA is co-located with the institution to which it is linked, which can promote social integration surrounding the campus and help people feel positive about the area in which they live, without adversely affecting the existing community.

The construction of student accommodation units will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile. In the long term, the provision of additional student accommodation may support economic growth related to the spending of the student population within the local economy and potentially lead to economic diversification in response to student's retail and leisure demands.

The policy supports the appropriate provision of well-connected student accommodation to meet local and strategic needs. This includes ensuring accommodation is easily accessible by walking, cycling and public transport infrastructure. The policy supports that S106 contributions will be required to help mitigate impact on key services such as transport infrastructure and health facilities. The provision of student accommodation, and appropriate consideration of supporting infrastructure could also underpin economic competitiveness, to ensure London remains an attractive destination for students, both domestically and internationally.

The provision of additional student accommodation may assist some adults in the wider region (both nationally and internationally) to attend HEI located within the LLDC planning area and thereby improve their learning, skills attainment and life chances. However, the impact for residents within the LLDC planning area is assumed to be minimal, given that presence or otherwise of student accommodation is irrelevant and unlikely to influence ability to attend HEI.

The policy states that new student accommodation should have no unacceptable adverse amenity impacts and the supporting text states that all proposals should demonstrate how potential for noise, disturbance and amenity impacts will be minimised through a management scheme. This does not reduce existing noise levels however it is in keeping with the agent of change principle in that it is required that adverse noise impacts and disturbance are avoided.

#### **8.7.4 Recommendations**

The policy should consider how safety can be improved and how crime can be discouraged through design, particularly for vulnerable student groups. The policy could also refer to inclusive access to key services, to ensure equity of opportunity for students with limited mobility. As students often travel at night, reference could be made to safe access routes, such as the provision of 24-hour transport links and sufficient lighting. Provision for single sex accommodation, and consideration for the religious needs of students should also be considered.

#### **8.7.5 Cumulative**

This policy strongly supports educational policies, ensuring the provision of student accommodation to support HEI. It also closely aligns with economic, social and cultural policies by encouraging vibrant and mixed communities.

#### **8.7.6 LLDC response**

The LLDC advises that additional reference to crime and safety, the night time economy and accessibility are to be included in the policy supporting text. Diversity of forms of provision are also to be included, subject to identified demand.

#### **8.7.7 Residual assessment**

The policy text has been amended to provide reference to crime and safety in regard to student accommodation. As outlined above, this is an important consideration for more vulnerable student groups who frequently travel at night.

#### **8.7.8 HRA Implications**

No likely significant effect at this stage.

Table 28: Policy H.4: Providing student accommodation

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				+	n/a		n/a	+	+	++	n/a	+											
Medium Term		+				+	n/a		n/a	+	+	++	n/a	+											
Long Term		+				+	n/a		n/a	+	+	++	n/a	+											
Direct / Indirect		D				D	n/a		n/a	D	D	D	n/a	D											
Temporary / Permanent		P				P	n/a		n/a	T, P	P	P	n/a	P											
Local / Greater London / Wider Region / Global		L/G L/W R				L	n/a		n/a	L, GL, WR	L/G L	L, GL, WR	n/a	L											
<b>EQIA</b>																									
Short Term	+	O	n/a	n/a	+	n/a	+	+	n/a	+	+	O	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Medium Term	+	O	n/a	n/a	+	n/a	+	+	n/a	+	+	O	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Long Term	+	O	n/a	n/a	+	n/a	+	+	n/a	+	+	O	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Direct / Indirect	D	D	n/a	n/a	D	n/a	I	D	n/a	D	D	D	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Temporary / Permanent	P	P	n/a	n/a	P	n/a	P	P	n/a	T, P	P	P	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	n/a	n/a	L/G L/W R	n/a	L	L/G L/W R	n/a	L, GL, WR	L	L, GL, WR	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
<b>HIA</b>																									
Short Term	O		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Medium Term	O		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Long Term	O		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Direct / Indirect	D		n/a		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Temporary / Permanent	P		n/a		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Local / Greater London / Wider Region / Global	L/G L/W R		n/a		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
<b>CSIA</b>																									
Short Term				+			+		n/a																
Medium Term				+			+		n/a																
Long Term				+			+		n/a																
Direct / Indirect				D			I		n/a																
Temporary / Permanent				P			P		n/a																
Local / Greater London / Wider Region / Global				L/G L			L		n/a																

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.8 Policy H.5: Location of gypsy and traveller accommodation

### 8.8.1 Policy context

#### 8.8.1.1 Policy summary

This policy sets out the approach to gypsy and traveller accommodation, ensuring sites are in appropriate and well-connected locations whilst protecting existing amenity for existing and potential residents.

#### 8.8.1.2 Policy change

This policy has been updated since the 2015 LLDC Local Plan to include changes made in the draft New London Plan (2018) including the definition of gypsy and travellers.

### 8.8.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised Table 29. Option 2 promotes the IIA objectives to the greatest degree by ensuring it complies with draft New London Plan. It also sets a requirement to cooperate with neighbouring authorities to deliver gypsy and traveller housing, ensuring housing requirements can be met across the local area. A full appraisal of each non-selected option is located in Appendix D.

Table 29: Policy H.5 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1</b>	Update to reflect new London Plan definitions	This option updates the policy in line with the requirements of the Draft New London Plan. It identifies the number of pitches required to meet the estimated need. However, as the LLDC is a smaller planning area and covers four boroughs, a duty to cooperate with neighbouring authorities ensures that any unmet need is managed and met elsewhere.
<b>Option 2 (Preferred option)</b>	update to reflect new London Plan definitions plus further reference to duty to cooperate	This is the preferred option. This option updates the policy based on the Draft New London Plan definitions but also sets out a requirement to cooperate with neighbouring authorities. As the LLDC is a smaller planning area within four wider boroughs, corporation is important to meet demand. Partnering with neighbouring authorities for audit purposes will also contribute to reducing health risks by identifying and managing overcrowding and poor design. The full assessment of this preferred option is outlined below.

#### 8.8.3 Initial assessment

The policy supports the protection and enhancement of gypsy and traveller sites, identifying new provision in line with need. This includes working with neighbouring

authorities to address strategic needs. This will support the diverse accommodation needs of London, and increase the supply of suitable provision for all groups. The policy also supports appropriate access to amenities, social and community facilities, and key transport infrastructure. This is likely to contribute to community cohesion, and support local amenity. The policy also supports the amenity of existing and potential residents, including noise and privacy considerations.

The provision of high quality and well-serviced gypsy and traveller sites is likely to support positive health outcomes and help reduce overcrowding and homelessness. The policy additionally supports the sustainable use of land through ensuring that land used by gypsy and traveller communities is located in appropriate and well-connected areas, and where demand cannot be met, it supports cooperation with neighbouring authorities.

The policy support strategic accommodation needs of gypsy and traveller communities. It will positively contribute to creating social inclusion and meeting the wider London need for gypsy and traveller sites. The policy supports sites that encourage accessibility to key amenities such as education and health services. By using the duty to cooperate approach, local boroughs may wish to consider how this can be met jointly. This is also likely to facilitate sustainable growth, help to unlock land for housing capacity, support equitable access to services and opportunities and ensure new accommodation is well connected and integrated.

Strategic engagement with neighbourhood boroughs and co-operation with gypsy and traveller communities will help to develop suitable sites, including those with accessibility to social and community facilities. Owing to this enhanced accessibility, gypsies and travellers can engage with cultural venues more easily. This will have indirect positive impacts on the local area including enhanced social integration within the community, the equality of opportunity for cultural engagement and greater investment in the local area through attendance at cultural venues.

The policy aims to deliver and safeguard suitable sites for gypsy and traveller communities, while meeting their lifestyles and living patterns, but it makes no reference on how this will be achieved in terms of material and waste management arrangements. Not making appropriate plans for this, may have a negative impact on the local environment as well as health and safety.

Existing sites will be safeguarded and new sites will be acceptable where the residential amenity of both existing and potential residents is not adversely affected including noise. This does not reduce existing noise levels. However it is in keeping with the agent of change principle in that it is required that adverse noise impacts are avoided both for existing and potential residents.

#### 8.8.4 Recommendations

Within stakeholder engagement/focus meetings between gypsies and traveller communities and the broader residential population, discussions should also focus on the reciprocal nature of participation with cultural activities. For instance, the current residential population should seek to enhance engagement for the gypsy population with their cultural activities and likewise, the gypsy/traveller population

should facilitate engagement for the existing residential community with any cultural activities that they may be hosting.

The policy should refer to the waste management arrangements to be put in place to ensure that they meet similar standards as the waste management strategy of the rest of the local authority in which the gypsy and/or traveller site is located.

#### **8.8.5 Cumulative**

This policy links closely with broader housing policies as it provides a specific housing type (gypsy and traveller accommodation) to meet the needs of a specific group of individuals.

#### **8.8.6 LLDC response**

The LLDC advises that additional reference is to be included on the role of extensive engagement approaches between communities and the need for planning decisions to consider equalities impacts.

#### **8.8.7 Residual assessment**

Amendments have been made to the policy to provide further clarity on engagement, however the overall effect of implementation will remain the same as noted in the initial appraisal.

#### **8.8.8 HRA Implications**

No likely significant effect at this stage.

Table 30: Policy H.5: Location of gypsy and traveller accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				+	n/a		n/a	n/a	+	n/a	+	n/a	n/a	O	+							
Medium Term		+				+	n/a		n/a	n/a	+	n/a	+	n/a	n/a	O	+							
Long Term		+				+	n/a		n/a	n/a	+	n/a	+	n/a	n/a	O	+							
Direct / Indirect		D				I	n/a		n/a	n/a	D	n/a	I	n/a	n/a	D	D							
Temporary / Permanent		P				P	n/a		n/a	n/a	P	n/a	T, P	n/a	n/a	T/P	P							
Local / Greater London / Wider Region / Global		L/G L/W R				L	n/a		n/a	n/a	L/G L	n/a	L	n/a	n/a	L	L							
<b>EQIA</b>																								
Short Term	+	O	+	n/a	+	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Medium Term	+	O	+	n/a	+	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Long Term	+	O	+	n/a	+	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	n/a	n/a	D	n/a	n/a	D	n/a	I	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	n/a	n/a	P	n/a	n/a	P	n/a	T, P	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	n/a	L/G L/W R	n/a	n/a	L	n/a	L	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	O		n/a		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	O		n/a		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	O		n/a		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	D		n/a		D		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		n/a		P		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	T, P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		n/a		L/G L		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.9 Policy H.7: Shared living accommodation

### 8.9.1 Policy context

#### 8.9.1.1 Policy summary

This policy sets out the approach to provide large-scale, shared living accommodation. It ensures these homes are in a suitable location, appropriately managed and are well-designed and sustainable.

#### 8.9.1.2 Policy change

This is a new policy and was not previously part of the 2015 LLDC Local Plan.

### 8.9.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 31. The preferred option is identified as Option 3, which sets out a new shared living accommodation for the Local Plan and identifies appropriate areas where this specific type of accommodation is required. A full appraisal of each non-selected option is located in Appendix D.

Table 31: Policy H.7 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1</b>	Do not include a shared living policy and rely upon London Plan H18	This option is to not include a shared living policy and instead relies upon Policy H18 of the London Plan. Without a specific policy in the Local Plan, the delivery of shared accommodation could be very limited. This could have adverse impacts on overall housing delivery and could restrict alternative forms of accommodation that supports the needs of different communities in the LLDC Planning Area. Shared accommodation can also help to manage wider issues such as homelessness and overcrowding, and meet the demand for more affordable forms of housing.
<b>Option 2</b>	Include a local shared living policy to take account of H18 with local definitions	This option is to include a new policy in the Local Plan focusing on shared living. This will contribute to the overall supply and range of housing and ensure that alternative accommodation needs are met. It supports the creation of mixed communities and delivers affordable forms of housing which are built to a high standard and are well designed.
<b>Option 3 (preferred option)</b>	Include a local shared living policy to take account of H18 with local definitions and locational direction	This is the preferred option. This option is to include a new policy in the Local Plan focusing on shared living. This will contribute to the overall supply and range of housing and ensure that alternative accommodation needs are met. It supports the creation of mixed communities and delivers affordable forms of housing which are built to a high standard and are well designed. This option also includes locational direction, identifying appropriate areas of the LLDC Planning Area where there is a need for shared living accommodation and where

Options	Option overview	Option appraisal
		there are opportunities to create more vibrant neighborhood. The full assessment of this preferred option is outlined below.
<b>Option 4</b>	Refer to shared living as one product within a new 'Innovative Housing models' policy	This option is to not include a shared living policy and instead incorporates it into the housing innovations policy. Whilst this ensures that shared living is part of the Local Plan, it still limits the potential for this policy. Rising house and rental prices have made shared living accommodation a viable option and a separate policy demonstrates the LLDC's commitment to meeting local demand. The inclusion of locational direction in the preferred option also ensures that this accommodation is delivered where there is demand and where it can contribute positively to the community. The innovative housing models policy still supports the delivery of shared living accommodation, but provides a broader approach to housing models rather than a focused delivery of a specific type of housing which meets a local need.

### 8.9.3 Initial assessment

Shared accommodation provides opportunities for residents to develop a sense of ownership and community. It can help create mixed neighbourhoods, supporting resilient and strong communities. The policy facilitates the strategic need of affordable and shared living housing which could improve mental wellbeing for residents as it supports access to secure homes. However, edge-of-centre development could reduce integration into the community.

The policy supports proposals for large-scale shared living accommodation in appropriate locations and supported by communal facilities, particularly towards the Metropolitan Centre or edge of Metropolitan Centre locations. This is likely to contribute to the overall supply and range of housing, and ensure that alternative accommodation needs are met. The requirement for high quality design, inclusive neighbourhoods, amenity space and ongoing management arrangements could help to improve resident amenity and create a sense of community and support a range of positive health and well-being outcomes.

The construction of new shared accommodation will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

The requirement for developments to meet high residential design standards can help to improve energy efficiency and reduce the cost of heating for resident.

This policy supports the delivery of a shared living accommodation, accounting for locational direction. The policy outlines that the proposal will meet high residential

design standards and this suggests avoiding detrimental impacts on the historic environment and heritage assets. However, there are not any conditions in the policy that actively support the conservation and enhancement of the historic environment.

#### **8.9.4 Recommendations**

The policy should make further reference to how design of shared living accommodation can encourage people to walk and cycle, can be inclusive and flexible for a variety of potential users, contribute to the wider built environment and promote sustainable construction methods.

The policy text could be expanded to include how accessibility for equalities groups will be met. In particular, transport modes to enable people to travel from the edge-of-centre into the town centre.

#### **8.9.5 Cumulative**

This policy contributes to wider housing policies, providing a specific type of accommodation.

#### **8.9.6 LLDC response**

The preferred locations for shared living have been identified due to their accessibility and the potential benefits for the area, therefore reference to travel modes from edge-of-centre sites are not required. The impact on the historic environment is covered by other policies therefore not specifically required within this policy

#### **8.9.7 Residual assessment**

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

#### **8.9.8 HRA Implications**

No likely significant effect at this stage.

Table 32: Policy H.7: Shared living accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		n/a	+	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	O	n/a	n/a	n/a
Medium Term		++				+	+		n/a	+	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	O	n/a	n/a	n/a
Long Term		++				+	+		n/a	+	+	n/a	+	n/a	n/a	n/a	+	n/a	n/a	n/a	O	n/a	n/a	n/a
Direct / Indirect		D				I	I		n/a	D	D	n/a	I	n/a	n/a	n/a	D	n/a	n/a	n/a	I	n/a	n/a	n/a
Temporary / Permanent		P				P	P		n/a	T	P	n/a	P	n/a	n/a	n/a	P	n/a	n/a	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	L		n/a	L, GL, WR	L/G L	n/a	L, GL, WR	n/a	n/a	n/a	L	n/a	n/a	n/a	L, GL	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	++	?	+	n/a	+	n/a	n/a	++	n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	?	+	n/a	+	n/a	n/a	++	n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	?	+	n/a	+	n/a	n/a	++	n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I	?	D	n/a	D	n/a	n/a	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	?	P	n/a	P	n/a	n/a	P	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	n/a	L/G L/W R	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	?		?		+		n/a		n/a	n/a					n/a	n/a		+	n/a		n/a	O	n/a	n/a
Medium Term	?		?		+		n/a		n/a	n/a					n/a	n/a		+	n/a		n/a	O	n/a	n/a
Long Term	?		?		+		n/a		n/a	n/a					n/a	n/a		+	n/a		n/a	O	n/a	n/a
Direct / Indirect	?		?		D		n/a		n/a	n/a					n/a	n/a		D	n/a		n/a	I	n/a	n/a
Temporary / Permanent	?		?		P		n/a		n/a	n/a					n/a	n/a		P	n/a		n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		n/a		n/a	n/a					n/a	n/a		L	n/a		n/a	L, GL	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.10 Policy H.8 Innovative housing models

### 8.10.1 Policy context

### 8.10.2 Policy summary

This policy outlines an approach to flexible forms of accommodation and the emergence of new housing products across the market. It ensures innovative homes contribute to the strategic housing supply, meet local need and provide the appropriate percentage of affordable housing.

### 8.10.3 Policy change

This is a new policy and was not previously part of the 2015 LLDC Local Plan.

### 8.10.4 Initial assessment

The policy supports innovative housing models to meet strategic housing need. By positively aiming for mixed-use developments and inclusive neighbourhoods, including the provision of 35% affordable housing, the policy contributes to reducing poverty and social exclusion for key groups including people on low incomes and those in temporary accommodation. The policy also states that all innovative housing models should demonstrate how they contribute to mixed and inclusive communities and support strategic housing supply. This will positively apply to a range of groups including from low income individuals, BAME groups and people with disabilities.

The supporting text states the proposals should demonstrate how they contribute to mixed and inclusive communities, and provide appropriate mitigation where required. This is likely to facilitate the delivery of much needed housing in London, and promote accessible, adaptable and affordable housing to meet a range of needs. This could also play a role in reducing overcrowding and homelessness, particularly as a range of housing types and affordability are considered within the policy. The policy also supports contributions towards community infrastructure and economic growth, which could encourage a sense of community and enhance local amenity. However, it is not specific in referring to inclusive design and connectivity

The supporting text states that proposals should also demonstrate how they contribute towards wider policy aspirations such as economic growth, community infrastructure provision, or enhancing the cultural and creative sectors. This is likely to underpin economic competitiveness and sustainable housing delivery. Such schemes also have the potential to deliver additional employment opportunities within deprived areas and to stimulate regeneration. Further inclusion of employment opportunities in proximity to residential development may help to minimise barriers to employment around issues such as transport and childcare, and support working families, if employees can live close to workplaces.

Depending on the nature and age of the historic environment, the housing provision outlined in this policy may affect the setting of the historic environment and/or any protected views. However, mitigation measures could be put in place to minimise the

impacts and design measures may ensure aesthetic consistency with the current environment. The impact of this policy on the historic environment very much depends on the significance of the cultural heritage where the development is scheduled to be built.

The re-use at another site of materials used for an interim innovative residential use, will prolong the useful life of surplus materials, and will help to reduce waste generation in the local area through this policy.

### 8.10.5 Recommendations

The policy text could be expanded to include the Healthy Streets Approach, accessible design. The policy should also require that innovative physical forms of housing do not compromise the townscape and character of the area. This policy should also consider that the new houses must be built in-keeping with the current historic environment to ensure there are no significant setting impacts.

It is currently not clear whether the re-use of materials on another site applies only to interim residential uses. To keep materials at their highest value at all times, this policy should include information on how to re-use surplus or unwanted materials on other sites, in general. In addition, the policy should clarify if it accounts for the re-use of both construction and non-construction materials.

### 8.10.6 Cumulative

This policy closely aligns with other housing policies, providing another type of housing to be delivered in the LLDC which contributes to the overall housing need.

### 8.10.7 LLDC Response

The LLDC advises that other Local Plan policies cover the Mayor's Healthy Streets initiative as well as environmental and the setting of new development within the built environment and waste therefore specific reference within this policy is not considered necessary. The policy does however set out where the impact of the development is considered greater than other housing products mitigation measures may be required. This includes infrastructure as per the recommendation, therefore reference to this will specifically be included for clarity.

### 8.10.8 Residual assessment

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### 8.10.9 HRA Implications

No likely significant effect at this stage.

Table 33: Policy H8 Innovative housing models

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				n/a	+		O	+	+	n/a	?	n/a	?	n/a	+	n/a						
Medium Term		++				n/a	+		O	+	+	n/a	?	n/a	?	n/a	+	n/a						
Long Term		++				n/a	+		O	+	+	n/a	?	n/a	?	n/a	+	n/a						
Direct / Indirect		D				n/a	D		I	I	I	n/a	I	n/a	D	n/a	D	n/a						
Temporary / Permanent		P				n/a	T/P		P	P	P	n/a	P	n/a	P	n/a	T	n/a						
Local / Greater London / Wider Region / Global		L/G / W / R				n/a	L/G / L		L	L	L/G / L / WR	n/a	L, GL	n/a	L/G / L	n/a	L	n/a						
<b>EQIA</b>																								
Short Term	++	+	++	n/a	++	n/a	n/a	+	n/a	+	?	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	+	++	n/a	++	n/a	n/a	+	n/a	+	?	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	+	++	n/a	++	n/a	n/a	+	n/a	+	?	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	I	n/a	D	n/a	n/a	I	n/a	I	I	n/a	I	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	n/a	n/a	P	n/a	P	P	n/a	P	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G / W / R	L/G / W / R	L/G / W / R	n/a	L/G / L / WR	n/a	n/a	L/G / L / WR	n/a	L	L	n/a	L, GL	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		n/a
Medium Term	+		++		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		n/a
Long Term	+		++		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		n/a
Direct / Indirect	D		I		I		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G / W / R		L/G / W / R		L/G / L		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L/G / L	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.11 Policy BN.4: Designing development

### 8.11.1 Policy context

#### 8.11.1.1 Policy summary

This policy outlines how new developments should be well designed, taking into account policy and guidance such as the LLDC Design Quality Policy. The policy sets out a number of conditions which promote good design and usable spaces.

#### 8.11.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to incorporate the LLDC Design Quality Policy.

### 8.11.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 34. Option 3 promotes the IIA objectives to the greatest degree by ensuring it references the LLDC Design Quality Policy, encouraging high-quality design. It goes further to ensure the policy applies to mixed-use development, not just residential, to deliver wider regeneration across the LLDC Planning Area. A full appraisal of each non-selected option is located in Appendix D.

Table 34: Policy BN.4 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1</b>	Redraft policy to simply exclude reference to the Baseline Standards and refer only to the Nationally Described Space Standards.	This option is to keep the policy similar to the 2015 LLDC Local Plan, but remove the reference to baseline standards. This limits the effectiveness of the policy by removing specific standards which set a precedent for high-quality design which promotes regeneration in the LLDC Planning Area.
<b>Option 2</b>	Replace reference to the baseline standards with reference to the LLDC Design Quality Policy as a source of guidance on approach to quality standards for all development in the LLDC area.	This option is to replace the reference to baseline standards with the Design Quality Policy. The LLDC Design Quality Policy sets out best practice guidance to achieve high quality design in development schemes and provide a benchmark for other new development in the LLDC Planning Area. This will contribute to the delivery of well-designed residential development in the LLDC Planning Area, facilitating the delivery of new homes, which achieve a high standard of liveability.
<b>Option 3 (preferred option)</b>	Redraft policy to exclude reference to the Baseline Standards, add reference to the LLDC Design Quality Policy and include the generally applicable policy elements of Policy BN.10. This would also include the	This is the preferred option. This option is to remove the baseline standards and include a reference to the Design Quality Policy, which encourages high-quality design and sets a benchmark for new development in the LLDC Planning Area. This policy goes further to include reference to mixed-use development, expanding the scope of the policy beyond just residential development. This ensures that other development, including employment, retail and leisure, must conform to high standards. This will ensure improvements to the wider LLDC Planning Area, delivering mixed-use developments which facilitate wider regeneration

Options	Option overview	Option appraisal
	rebadging of the policy to include mixed-use development and a reference to non-residential development. This would form part of a wider revamp of built design policies, in particular Policy BN.10 which would be made more specific. In this scenario Policy BN.10 would be relocated to follow on from Policy BN.4.	and contribute positively to the community. The full assessment of this preferred option is outlined below.

### 8.11.3 Initial assessment

The policy supports good design which can promote inclusion, a reduction in poverty, good accessibility and improved connectivity to local places and environments. Well-designed environments can help to improve confidence to take up opportunities that promote physical activity and foster an active lifestyle. Environments that promote this have a positive effect on mental wellbeing and to encourage a sense of community due to positive and inclusive design.

The policy supports the provision of high quality development, to contribute to integrated, legible and connected places. This includes development that is in line with space standards, and seeks to achieve a high standard of liveability, such as the provision of well-designed and appropriately located communal and private amenity space. The provision of high quality development could also play a role in reducing homelessness and overcrowding, and support positive health and wellbeing outcomes.

The policy supports well-designed mixed-use developments that incorporate business and commercial floorspace with residential. The creation of additional employment uses has the potential to increase productivity, deliver economic benefits and provide employment within deprived areas, stimulating regeneration. Further mixed-used developments offer an opportunity to minimise barriers to employment around transport and childcare and support working families by providing employment opportunities close to residences.

Landscaping aspects could include SuDS and other features that might increase natural infiltration of storm water and decrease the proportion diverted to sewers. This can reduce the risk of pluvial flooding. Rainwater harvesting is one method which may reduce water demand if water is reused on site, for example in flushing toilets. The policy does not currently reference the natural environment as an element of high quality design and liveability. However, it will ensure open spaces receive adequate levels of daylight and sunlight.

The policy actively supports the protection of heritage, stating that heritage assets should be preserved and enhanced, as should the views to/from these, and

contribute positively to the setting of heritage assets, including conservation areas. The protection and enhancement of heritage assets at the design stage will also indirectly contribute towards the better management of heritage assets and tackling those at risk in these initial design phases and will enhance awareness for those assets at risk.

This policy highlights the need for sustainable design, and promotes the use of high-quality construction materials that age well over time. This promotes certain circular economy principles, as it will help reduce construction waste in the long term, as less repairs and maintenance should be expected.

The policy text states that development should minimise adverse impacts upon existing surrounding development which is in keeping with the agent of change principle. The policy does not directly require mitigation of disturbances from existing noise, however noise levels from new development have the potential to be reduced through the requirement to minimise adverse noise impacts or introduce enhancements to control existing noise sources.

#### 8.11.4 Recommendations

This policy could support Healthy Streets Approach and use the Healthy Urban Design Unit (HUDU) check list to encourage good design. The policy could support well designed developments which create safe and vibrant places to help reduce crime. Designing out crime could help to improve the perception of safety in the local community.

The natural environment, both green spaces and green infrastructure, should be included as an element of high quality design and liveability. Sensory environments and play spaces should also be included as an element of high quality design and liveability. The policy may then have a positive impact on this objective.

In order to enhance the objectives of this policy, consideration should be given on how construction material wastage can be achieved, by selecting both appropriate construction materials and appropriate construction techniques (e.g. off-site prefabrication). In addition, circular design methods (such as modular design) should be promoted, as these will help to keep construction materials at their highest value and facilitate their reuse after building decommissioning.

#### 8.11.5 LLDC response

The LLDC advised that revisions to this policy have been developed specifically to ensure that this provides a series of design-based tests for new development, i.e. is focused on the physical design of the scheme. Requirements for addressing issues such as healthy streets and crime are addressed within other policies in the Plan in order to ensure the policy remains focused and useable. Many of these elements are also dealt with within the Design Quality Policy.

It is considered important to ensure that this policy is cross-reference to the other policies in the Plan that deal with these issues in order to ensure they are also taken into account in scheme design and assessment.

#### 8.11.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

#### 8.11.7 HRA Implications

No likely significant effect at this stage.

Table 35: Policy BN.4: Designing development

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				n/a	++		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+	O	+	n/a	O	O
Medium Term		+				n/a	++		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+	O	+	n/a	+	O
Long Term		+				n/a	++		n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a	+	+	O	+	n/a	++	O
Direct / Indirect		D				n/a	D		n/a	I	D	n/a	n/a	n/a	n/a	n/a	n/a	I	I	I	D	n/a	I	D
Temporary / Permanent		P				n/a	P		n/a	P	P	n/a	n/a	n/a	n/a	n/a	n/a	P	P	P	P	n/a	P	P
Local / Greater London / Wider Region / Global		L/G L/W R				n/a	L		n/a	L	L/G L/W R	n/a	n/a	n/a	n/a	n/a	n/a	L	L	L	L, GL	n/a	L	L
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	n/a	++	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a		+	O	+		n/a	n/a
Medium Term	+	+	+	n/a	+	n/a	++	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a		+	O	+		n/a	n/a
Long Term	+	+	+	n/a	+	n/a	++	+	n/a	+	+	n/a	n/a	n/a	n/a	n/a	n/a		+	O	+		n/a	n/a
Direct / Indirect	D	I	I	n/a	D	n/a	D	D	n/a	I	D	n/a	n/a	n/a	n/a	n/a	n/a		I	I	I		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	n/a	P	P	n/a	P	P	n/a	n/a	n/a	n/a	n/a	n/a		P	P	P		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L	n/a	L	L/G L/W R	n/a	L	L/G L	n/a	n/a	n/a	n/a	n/a	n/a		L	L	L, GL		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		++		n/a	n/a					n/a	n/a		n/a	+		+	+	n/a	n/a
Medium Term	+		++		+		++		n/a	n/a					n/a	n/a		n/a	+		+	+	n/a	n/a
Long Term	+		++		+		++		n/a	n/a					n/a	n/a		n/a	+		+	+	n/a	n/a
Direct / Indirect	I		D		I		D		n/a	n/a					n/a	n/a		n/a	I		I	D	n/a	n/a
Temporary / Permanent	P		P		P		P		n/a	n/a					n/a	n/a		n/a	P		P	P	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		L		n/a	n/a					n/a	n/a		n/a	L		L	L, GL	n/a	n/a
<b>CSIA</b>																								
Short Term				+/?			++		n/a															
Medium Term				+/?			++		n/a															
Long Term				+/?			++		n/a															
Direct / Indirect				I/D			D		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L			L		n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.12 Policy BN.5: Proposals for tall buildings

### 8.12.1 Policy context

#### 8.12.1.1 Policy summary

This policy sets out the appropriate locations for tall buildings and provides eight criteria which should be followed to ensure tall buildings do not adversely impact the local area.

#### 8.12.1.2 Policy change

This policy has changed since the 2015 LLDC Local Plan to include the location of tall building both inside and outside centre boundaries.

### 8.12.2 Option appraisal

An appraisal of options was undertaken for this policy, which is summarised in Table 36. Option 3 promotes the IIA objectives to the greatest degree by setting out specific design requirements for tall buildings. It also sets a requirement for detailed planning applications to be submitted for tall building development, ensuring the full impact of the developments are fully understood. A full appraisal of each non-selected option is located in Appendix D.

Table 36: Policy BN.5 option appraisal summary

Options	Option overview	Option appraisal
<b>Option 1</b>	No change, with policy wording retained as in current plan. Policy seen as a helpful tool in addressing development height without being prescriptive.	This option is to not amend the policy from the 2015 LLDC Local Plan. This would result in inconsistencies throughout the plan, as local sub-area policies do not refer to the delivery of tall buildings where appropriate. Additionally, ambiguous terms such as 'outstanding architecture' would remain and the potential for more specific design requirements will not be achieved. The assessment of this option is outlined in the 2015 LLDC Local Plan SA.
<b>Option 2</b>	Minor amendments to the policy to clarify expectations in terms of the "outstanding architecture" requirement in the policy where this has been a point of contention in interpretation of the policy in practice. This would clarify that meeting the relevant tests in the Policy will be what defines this term. Subsequent points in the policy.	This option is to make a minor amendment to the 2015 LLDC Local Plan policy to clarify the definition of outstanding architecture. This will provide a greater understanding of what tall buildings should be delivering in terms of high quality design, appropriate development and a positive contribution to the wider public realm and community.

Options	Option overview	Option appraisal
<b>Option 2a</b>	Adds amendment to the relevant parts of the four sub area sections in the Plan that define the building height at which Policy BN.10 will apply. These aim to achieve greater consistency between the approach across the sub area sections of the Plan. The specific changes are identified in the changes for each sub area in this document.	This option amends the relevant sub-area policies identified in this policy to ensure tall buildings are referenced where applicable. By adding in a reference to tall buildings within the sub-area sections, this ensures consistency throughout the Local Plan and demonstrates the relevance of tall buildings within each sub-area in more detail. This however does not change the policy text itself and is therefore considered a consequential amendment of changes to sub-area policies.
<b>Option 3 (preferred option)</b>	Incorporates Option 2a to ensure consistency of the policy application within each of the four sub area sections of the plan. It would also reformulate the policy to move more general design criteria to Policy BN.4, expand and make more specific the remaining policy criteria and move the text on location of tall buildings to the start of the policy.	This is the preferred option. This option is to amend the four sub-areas to include reference to tall buildings, ensuring consistency throughout the Local Plan. This option also makes the policy more specific to tall buildings, removing more general design text to BN.4. It expands on the design principles tall buildings should follow, ensuring tall buildings contribute to the surrounding townscape, are of a high quality and enhance views and vistas. This option also sets a requirement for detailed planning applications to be submitted to ensure the planning authorities understand the full impact of the tall building and certify that the final design is appropriate and beneficial to the local area. The full assessment of this preferred option is outlined below.

### 8.12.3 Initial assessment

The policy supports proposals for well-designed, appropriately located tall buildings. This could facilitate the delivery of housebuilding to meet the needs of Londoners. The high-quality design, including relationship with surrounding uses, provision of public realm, access and servicing could help to enhance resident amenity. Depending on the type of accommodation provided, it could also help to reduce homelessness and overcrowding.

The policy does not support sustainable land use for equality purposes, since there is no express provision for the development to consider the effect of the high-density nature of tall buildings on different groups of people. However, tall buildings are often a symbol of regeneration which could have positive effects on the community from the consideration of the building's contribution to the townscape and the public realm at the ground level.

The policy strongly supports good design by requiring decision makers and developers to consider detailed design planning applications, and promotes the conservation and enhancement of the local area, contributions to the public realm, and appropriate form and function of the building among other considerations.

The construction of tall buildings will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy also refers to the refusal of applications if they have an adverse impact on micro-climate conditions (down-draughts and lateral winds). Additionally, greenscapes and the natural environment are not acknowledged directly in the criteria set out on this policy, however they are likely to be of significance in achieving the exceptionally good design that is sought after. However, open and amenity spaces are acknowledged in the criteria, which could contribute to increasing biodiversity in the most built-up areas.

This policy suggests that tall buildings cannot be designed nor constructed unless the building makes a positive contribution to the surrounding landscape, and does not have a significant negative impact on heritage assets. Thus, any buildings that are constructed must enhance the aesthetics of the landscape and the setting environment, thereby contributing positively to the quality and conditions of the historic environment.

#### 8.12.4 Recommendations

The policy could refer to the role of tall buildings in providing a range of housing needs, including affordable, accessible and adaptable units. The policy could also refer to accessible social, economic and environmental infrastructure required to support the sustainable delivery of tall buildings.

The policy should also include positive contributions to greenscapes and the natural environment as a criterion for proposals for tall buildings. This should be supported with reference to green and blue infrastructure (such as green roofs/walls, street trees) and their function in the green space network and blue-ribbon network.

#### 8.12.5 LLDC response

The LLDC advised that Policy BN.6 Inclusive Design addresses inclusive design issues.

Housing needs, which given the nature of the LLDC area, includes the role of tall building, is dealt with within the Housing section of the Plan and Policy BN6.

The policy includes reference to the need to avoid significant adverse impact on the amenity of surrounding areas including open space and buildings. It is therefore considered sufficient without specific further reference to blue and green infrastructure, which is also dealt with in detail in other policies.

#### 8.12.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

#### 8.12.7 HRA Implications

No likely significant effect at this stage.

Table 37: Policy BN.5: Proposals for tall buildings

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	++		n/a	+	+	n/a	+	+	n/a	n/a	n/a							
Medium Term		n/a				n/a	++		n/a	+	+	n/a	+	O	n/a	n/a	n/a							
Long Term		n/a				n/a	++		n/a	+	+	n/a	+	O	n/a	n/a	n/a							
Direct / Indirect		n/a				n/a	D		n/a	D	D	n/a	I	D	n/a	n/a	n/a							
Temporary / Permanent		n/a				n/a	P		n/a	T	P	n/a	P	P	n/a	n/a	n/a							
Local / Greater London / Wider Region / Global		n/a				n/a	GL		n/a	L, GL, WR	L/G L/W R	n/a	L	L, GL	n/a	n/a	n/a							
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	O	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	+	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	O	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	+	n/a		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	O	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	+	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	D	I	I	n/a	n/a	D	I	n/a	n/a	n/a	n/a		n/a		n/a	I	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	P	P	n/a	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	P	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/G L/W R	GL	L	n/a	n/a	L, GL, WR	L/G L	n/a	n/a	n/a	n/a		n/a		n/a	L	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		?		+		n/a	n/a				n/a	?		n/a	n/a		+	+	n/a		n/a
Medium Term	n/a		n/a		?		+		n/a	n/a				n/a	?		n/a	n/a		+	+	n/a		n/a
Long Term	n/a		n/a		?		+		n/a	n/a				n/a	?		n/a	n/a		+	O	n/a		n/a
Direct / Indirect	n/a		n/a		I		I		n/a	n/a				n/a	I		n/a	n/a		I	D	n/a		n/a
Temporary / Permanent	n/a		n/a		P		P		n/a	n/a				n/a	P		n/a	n/a		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L		L		n/a	n/a				n/a	L		n/a	n/a		L	L, G L	n/a		n/a
<b>CSIA</b>																								
Short Term				O			+		n/a															
Medium Term				O			+		n/a															
Long Term				+			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L			L		n/a															

**Objectives**

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- To conserve London's geodiversity and protect soils from development and over intensive use.
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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.13 Policy BN.11: Air Quality

### 8.13.1 Policy context

#### 8.13.1.1 Policy summary

This policy sets a requirement for new developments to improve air quality through measures which improve transport and energy efficiency.

#### 8.13.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan. It was originally part of a noise and air quality policy, but has been split to now include a separate air quality policy.

### 8.13.2 Initial assessment

The policy supports a clean air approach in development proposals, which can indirectly encourage individuals to choose a more active lifestyle of walking or cycling by providing more attractive and clean environments. Individuals experiencing health problems and sensitivity to air pollutants will be positively affected by this policy.

The policy supports improved energy efficiency within developments and the construction and design of developments will seek to minimise emissions/pollutants. This could help to reduce fuel poverty and ill-health for residents and ensure a healthier, safer environment for future and existing communities.

The policy encourages low emission development. By extension, this includes encouraging sustainable forms of transport that contribute to improved air quality. More sustainable forms of travel can also increase active travel. This could increase congestion on public footways, but as stated above, contribute to healthier lifestyles.

Reducing energy and transport emissions could benefit local air quality and help to reduce inequalities in terms of access to clean air. Reducing emissions could be beneficial to vulnerable people who live, learn or work near busy roads or energy centres. Improvements to local air quality will also help to avoid damage to sites, protected species and habitats, protecting their character as well as the wider green space network. This policy will also indirectly benefit biodiversity by removing barriers to foraging/commuting patterns and limiting aspects such as noise.

This policy reinforces the London Plan agenda of energy demand reduction through energy efficiency, which aims to minimize CO<sub>2</sub> emissions in accordance to the energy hierarchy "Be lean", "Be clean", "Be green". This promotes the use of renewables and a transition to a sustainable low carbon economy. The generation of energy locally will increase resilience of supply. However, with local generation and district heating schemes, residents do not get a choice to opt in/out and are therefore potentially vulnerable to high energy bills if the scheme is not managed responsibly.

### 8.13.3 Recommendations

The policy could provide further guidance in using good design principles to reduce air pollution, for example by incorporating natural capital solutions, encouraging people to walk and cycle, and promoting sustainable construction methods.

The policy could also include reference to the air quality benefits that arise from protecting, connecting and enhancing London's natural capital and ecosystem services.

### 8.13.4 Cumulative

This policy supports sustainable travel policies and other health improvement policies. However, implementing such measures could be costly for developers, affecting other development policies.

### 8.13.5 LLDC response

Additional reference will be included to the benefits that arise from protecting, connecting and enhancing London's natural capital and ecosystem services.

### 8.13.6 Residual assessment

The amendments made to the policy provide further clarity in relation to ecosystem services and natural capital, however the overall effect of implementation will remain the same as noted in the initial appraisal.

### 8.13.7 HRA Implications

No likely significant effect at this stage.

Table 38: Policy BN.11: Air Quality

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		O				O	O		+	n/a	n/a	n/a	n/a	+	n/a	+	++	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term		O				O	O		+	n/a	n/a	n/a	n/a	+	n/a	+	++	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term		O				O	O		+	n/a	n/a	n/a	n/a	+	n/a	+	++	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect		I				I	I		I	n/a	n/a	n/a	n/a	D	n/a	D	I/D	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	P		P	n/a	n/a	n/a	n/a	P	n/a	P	P	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	L		L/G L/W R	n/a	n/a	n/a	n/a	L, GL	n/a	WR	L	n/a	n/a	GL/WR	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	O	+	+	n/a	n/a	O	n/a	+	n/a	n/a	n/a	n/a	n/a	+	+		O	n/a	n/a	+	n/a		n/a	n/a
Medium Term	O	+	+	n/a	n/a	O	n/a	+	n/a	n/a	n/a	n/a	n/a	+	+		O	n/a	n/a	+	n/a		n/a	n/a
Long Term	O	+	+	n/a	n/a	O	n/a	+	n/a	n/a	n/a	n/a	n/a	+	+		O	n/a	n/a	+	n/a		n/a	n/a
Direct / Indirect	I	D	D	n/a	n/a	I	n/a	D	n/a	n/a	n/a	n/a	n/a	D	D		D	n/a	n/a	I	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	n/a	P	n/a	P	n/a	n/a	n/a	n/a	n/a	P	P		P	n/a	n/a	P	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	n/a	L	n/a	L/G L/W R	n/a	n/a	n/a	n/a	n/a	L, GL	L		L	n/a	n/a	GL/WR	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		+		+		n/a		O	++				+	+		O	n/a		+	n/a	n/a		n/a
Medium Term	+		+		+		n/a		O	++				+	+		O	n/a		+	n/a	n/a		n/a
Long Term	+		+		+		n/a		O	++				+	+		O	n/a		+	n/a	n/a		n/a
Direct / Indirect	D		D		I		n/a		I	D				D	I		D	n/a		I	n/a	n/a		n/a
Temporary / Permanent	P		P		P		n/a		P	P				P	P		P	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L		n/a		L	L				L, GL	L		L	n/a		GL/WR	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		+															
Medium Term				n/a			n/a		+															
Long Term				n/a			n/a		+															
Direct / Indirect				n/a			n/a		L															
Temporary / Permanent				n/a			n/a		T															
Local / Greater London / Wider Region / Global				n/a			n/a		L/G L															

**Objectives**

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23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.14 Policy BN.12: Noise

### 8.14.1 Policy context

#### 8.14.1.1 Policy summary

This policy ensures new developments minimise noise impacts, complying with the draft New London Plan and agent of change principle.

#### 8.14.1.2 Policy change

This policy was part of the 2015 LLDC Local Plan as a combined policy with air quality. This has since been split, and a separate noise policy included.

### 8.14.2 Initial assessment

The policy supports inclusive design by minimising noise this has less potential to affect the mental wellbeing of residents. Reducing noise and disturbance will contribute to the prevention of physical and psychological ill-health associated with noise disturbance. A reduction in noise also has potential to promote enjoyment of the natural environment and promote sensory environments uninhibited by the adverse impacts of noise.

The policy supports sustainable design and construction methods by committing to minimise exposure to adverse impacts of noise, which can encourage people to use outdoor space and enhance the character of the area.

A reduction in noise has potential to encourage biodiversity at a local scale, including protected species. This policy would therefore enhance natural and semi-natural habitats as well as avoid damage due to noise. Local greenspaces would also have their character enhanced due to the policy minimising the adverse impacts of noise.

The policy specifically requires development proposals to demonstrate compliance with the agent of change principle. Therefore, the policy would promote mitigation of disturbances from existing noise on new developments with the onus being on the new development. The policy however does not directly require mitigation of disturbances from existing noise. Noise levels from new development have potential to be reduced through the requirement to mitigate these sources.

The policy does not explicitly mention minimising of road, rail and aviation noise and vibration levels. However, it does require new developments to minimise exposure to the adverse impacts of noise. The policy also requires new development to have appropriate regard to the Mayor's Ambient Noise Strategy which includes a number of policies relating to reducing noise and vibration from transport systems such as road rail and aviation and to consider night time noise impacts.

### 8.14.3 Recommendations

The policy should directly reference the adverse impacts of noise on biodiversity and the natural environment, and include the benefits of quiet areas to biodiversity and the natural environment.

### 8.14.4 LLDC response

The LLDC advised that reference to the adverse impacts of noise on biodiversity and the natural environment, and include the benefits of quiet areas to biodiversity and the natural environment will be included in the policy supporting text, and the references will be updated.

### 8.14.5 Residual assessment

The amendments made to the policy will benefit biodiversity by including the consideration of the protection, connection and enhancement of London's natural capital and ecosystem services.

### 8.14.6 HRA Implications

No likely significant effect at this stage.

Table 39: Policy BN.12: Noise

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				+	+		n/a	+	n/a	n/a	n/a	++										
Medium Term		+				+	+		n/a	+	n/a	n/a	n/a	++										
Long Term		+				+	+		n/a	+	n/a	n/a	n/a	++										
Direct / Indirect		D				D	I		n/a	I	n/a	n/a	n/a	D										
Temporary / Permanent		P				P	P		n/a	P	n/a	n/a	n/a	P										
Local / Greater London / Wider Region / Global		L/G L/W L				L	L		n/a	L	n/a	n/a	n/a	L										
<b>EQIA</b>																								
Short Term	O	+	+	n/a	+	+	+	n/a	+	n/a	n/a	n/a	++											
Medium Term	O	+	+	n/a	+	+	+	n/a	+	n/a	n/a	n/a	++											
Long Term	O	+	+	n/a	+	+	+	n/a	+	n/a	n/a	n/a	++											
Direct / Indirect	I	D	D	n/a	I	I	I	n/a	I	n/a	n/a	n/a	D											
Temporary / Permanent	P	P	P	n/a	P	P	P	n/a	P	n/a	n/a	n/a	P											
Local / Greater London / Wider Region / Global	L/G L/W L	L/G L/W L	L/G L/W L	n/a	L	L	L	n/a	L	n/a	n/a	n/a	L, GL											
<b>HIA</b>																								
Short Term	O		+		+		+		n/a	++				n/a	n/a				n/a	n/a	n/a	n/a	++	
Medium Term	O		+		+		+		n/a	++				n/a	n/a				n/a	n/a	n/a	n/a	++	
Long Term	O		+		+		+		n/a	++				n/a	n/a				n/a	n/a	n/a	n/a	++	
Direct / Indirect	I		D		I		I		n/a	D				n/a	n/a				n/a	n/a	I	n/a	n/a	D
Temporary / Permanent	P		P		P		P		n/a	P				n/a	n/a				n/a	n/a	P	n/a	n/a	P
Local / Greater London / Wider Region / Global	L/G L/W L		L/G L/W L		L		L		n/a	L				n/a	n/a				n/a	n/a	L	n/a	n/a	L
<b>CSIA</b>																								
Short Term				n/a			+		n/a															
Medium Term				n/a			+		n/a															
Long Term				n/a			+		n/a															
Direct / Indirect				n/a			I		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

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## 8.15 Policy BN.17: Conserving or enhancing heritage assets

### 8.15.1 Policy context

#### 8.15.1.1 Policy summary

This policy supports the approval of development within the boundary or setting of heritage assets, as long as the asset is preserved or enhanced. It also highlights the need for design to respect the history of an area and sets out a requirement to retain and, where possible, provide street trees.

#### 8.15.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include requirements for the preservation or enhancement of heritage assets and interest and the restoration or reuse of heritage assets.

### 8.15.2 Initial assessment

The policy supports development within the boundary or setting of heritage assets, if the setting and significance is retained and enhanced. This could help contribute to wider infrastructure needs, including housing requirements in London. This policy also encourages high quality and well-designed units to complement and enhance surrounding heritage assets.

The policy supports the sustainable use of land by permitting development that is sensitive to the nature of the landscape and listed assets in proximity of the development. This also contributes to the regeneration of heritage assets and promotes enhancement and use of the assets which are consistent with heritage-led regeneration. This includes regenerative uses that support existing communities. Given the sphere of influence of the heritage assets and conservation zones, including waterways, this will have an impact on the wider region.

Proposals for development in proximity to heritage assets will maintain and increase cultural facilities through the conservation of significant features such as special architecture or buildings of historic interest. This will in return, strengthen London's growing sector through the provision of opportunities for careers in the creative industries or the cultural heritage sector. Any additional growth in this sector represents an opportunity to diversify the local economy and offer additional employment opportunities for residents, including for the long-term unemployed, youth, disadvantaged groups and people with physical/mental health conditions and disabilities. Additionally, publicly available heritage assets which are well looked after, serve as a readily available source of cultural activity for residents and visitors of London. Many sites, particularly those which are free to access, for instance public buildings and parks, are also sources of cultural activity for marginalised or low-income groups.

The policy would protect and enhance London's natural capital by requiring proposals for development within the boundary or immediate setting of heritage assets to retain and/or provide street trees. They will also be required to enhance and reveal the significance of waterways which are vital to the function of the Blue-Ribbon Network. This policy would also likely result in more stringent storm water discharge rates to minimise the potential flood impact on the mentioned watercourses and the policy should aim for greater levels of on-site use of storm water in compliance with the draft New London Plan's SuDS hierarchy.

Proposals for development in proximity to heritage assets which effect the asset itself or the asset's setting will be acceptable only if they benefit the heritage assets either through conservation or enhancement. This can help ensure adequate management of heritage assets which are at risk. Additionally, consideration of the architectural and historic interest of the area within the design of new development will help to maintain the local character distinctiveness and characteristics of the community.

Proposals which support the conservation and enhancement of heritage assets will benefit the community through preservation of identity. Places of cultural significance can serve as areas for social integration and enhance a sense of place for all members of the community. Conservation of these areas will open up possibilities for further engaging and educating the public on the significance of the heritage assets. Ensuring that developments within proximity of heritage assets will work to preserve significant features such as special architecture or buildings of historic interest is an important step in ensuring that the cultural experience gained from sites will remain unimpeded for the residents and visitors of London.

### 8.15.3 Recommendations

The policy should explicitly reference that good design principles should be incorporated into development to ensure that developments are sensitive to heritage assets. Good design principles should also include inclusive design, ensuring heritage assets are accessible for all.

The policy could include further consideration of how to make heritage assets more accessible for marginalised and low-income groups who may benefit from using the site as a source of culture and social integration. The social impacts that preservation of heritage assets may have on the community could also be referenced in the policy.

The policy could also reference expanding architectural and historic interest to include historic green spaces (e.g. gardens), the protection of which would provide benefit to the natural environment.

### 8.15.4 Cumulative

This policy relates to any other policy that discusses the well-being of communities through social integration. It also closely aligns with other policies relating to design, as it seeks to consider and respect the historic environment in the design of new developments.

### **8.15.5 LLDC response**

The LLDC advised that point 4 of the policy has been slightly amended to be clear that the design and use of retained and re-used buildings and structure are accessible to all. The policy is considered to require consideration of the setting and context in its existing wording and so no additional wording has been suggested.

### **8.15.6 Residual assessment**

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### **8.15.7 HRA Implications**

No likely significant effect at this stage.

Table 40: Policy BN.16: Conserving or enhancing heritage assets

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		n/a				+	+			n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	++	n/a	n/a	n/a
Medium Term		n/a				+	+			n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a
Long Term		n/a				+	+			n/a	+	n/a	n/a	+	n/a	n/a	n/a	n/a	+	+	+	+	n/a	n/a	n/a
Direct / Indirect		n/a				D	D			n/a	I	n/a	n/a	D	n/a	n/a	n/a	n/a	D	D	D/I	D	n/a	n/a	n/a
Temporary / Permanent		n/a				P	P			n/a	P	n/a	n/a	P	n/a	n/a	n/a	n/a	P	P	P	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		n/a				W R	GL			n/a	L/ GL	n/a	n/a	L, GL	n/a	n/a	n/a	n/a	L	L	L	L	n/a	n/a	n/a
<b>EQIA</b>																									
Short Term	n/a	n/a	n/a	n/a	n/a	+	+	n/a	n/a	+	n/a	n/a	+	n/a	n/a		n/a	+	+	+	+		n/a	n/a	
Medium Term	n/a	n/a	n/a	n/a	n/a	+	+	n/a	n/a	+	n/a	n/a	+	n/a	n/a		n/a	+	+	+	+		n/a	n/a	
Long Term	n/a	n/a	n/a	n/a	n/a	+	+	n/a	n/a	+	n/a	n/a	+	n/a	n/a		n/a	+	+	+	+		n/a	n/a	
Direct / Indirect	n/a	n/a	n/a	n/a	n/a	D	I	n/a	n/a	I	n/a	n/a	D	n/a	n/a		n/a	D	D	D/I	I		n/a	n/a	
Temporary / Permanent	n/a	n/a	n/a	n/a	n/a	P	P	n/a	n/a	P	n/a	n/a	P	n/a	n/a		n/a	P	P	P	P		n/a	n/a	
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	n/a	W R	GL	n/a	n/a	L/ GL	n/a	n/a	L, GL	n/a	n/a		n/a	L	L	L	L		n/a	n/a	
<b>HIA</b>																									
Short Term	n/a		n/a		+		+			n/a	n/a				n/a	n/a		n/a	+		n/a	+	n/a		n/a
Medium Term	n/a		n/a		+		+			n/a	n/a				n/a	n/a		n/a	+		n/a	+	n/a		n/a
Long Term	n/a		n/a		+		+			n/a	n/a				n/a	n/a		n/a	+		n/a	+	n/a		n/a
Direct / Indirect	n/a		n/a		I		I			n/a	n/a				n/a	n/a		n/a	D		n/a	I	n/a		n/a
Temporary / Permanent	n/a		n/a		P		P			n/a	n/a				n/a	n/a		n/a	P		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L/ GL		GL			n/a	n/a				n/a	n/a		n/a	L		n/a	L	n/a		n/a
<b>CSIA</b>																									
Short Term				O			+			n/a															
Medium Term				O			+			n/a															
Long Term				+			+			n/a															
Direct / Indirect				I			I			n/a															
Temporary / Permanent				T			P			n/a															
Local / Greater London / Wider Region / Global				L			GL			n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
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  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
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  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.16 Policy SP.4: Planning for and securing transport infrastructure to support growth and convergence

### 8.16.1 Policy context

#### 8.16.1.1 Policy summary

The policy sets out how transport infrastructure will be delivered across the LLDC Planning Area, safeguarding land for the Docklands Light Railway (DLR) and Crossrail 2. It also commits to retaining existing public transport.

#### 8.16.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan. The policy originally included utilities and transport infrastructure, but now focuses on just transport.

### 8.16.2 Initial assessment

The policy will benefit residents through improved connectivity and inclusion, promoting social inclusion and access to job opportunities. However, it will be the responsibility of the local borough to work with the transport operators to ensure that the physical environment is free from barriers and is accessible to all particularly, older people, children and young people and people with disabilities.

The provision of a range of transport infrastructure, and measures to improve connectivity could help to unlock potential housing growth and increased capacity over the Plan period. Investment in transport infrastructure could improve accessibility to key infrastructure for both existing and future communities, improving the amenity of housing developments.

The policy supports improved connectivity across the LLDC Planning Area through the growth and convergence of transport infrastructure. It supports the sustainable use of land by improving capacity and access at Stratford Station. However, the policy does not mention sustainable or active forms of travel, which could be emphasised as part of the overall growth of public transport infrastructure.

This policy supports economic growth by ensuring the area is well connected and therefore appealing to businesses by enabling residents to access employment opportunities and retail and leisure facilities, thereby increasing consumer traffic/local spending. Ensuring the area has the appropriate infrastructure helps the area to compete on a national and potentially international basis for investment.

The policy supports the provision of new public transport infrastructure, and measures to retain existing infrastructure. This will improve local, regional and national connectivity, and support sustainable and balanced growth. The appropriate provision of transport infrastructure can help to unlock potential housing growth/increased capacity, and ensure services and employment sites are accessible.

Safeguarding land for public transport infrastructure should encourage the reduction in private car usage. This could reduce local pollutant concentrations and carbon emissions, contributing towards reducing emissions and improving air quality in London.

The policy refers to promoting and delivering the infrastructure necessary to support the growth and development identified within the Local Plan and Infrastructure Delivery Plan. No reference is however made in respect to the minimising of road, rail and aviation noise and vibration levels and disruption.

### 8.16.3 Recommendations

It is important to safeguard land for public transport infrastructure. However, the policy could go further by committing to electric buses, cycling infrastructure and other forms of sustainable transport. There may need to be some further consideration as to where transport links and schools/ care homes/ hospitals are located to reduce road transport emissions in these areas. The policy could also make specific reference to minimising road, rail and aviation noise and vibration levels.

### 8.16.4 Cumulative

The policy closely aligns with employment policies, increasing connectivity across the LLDC Planning Area to improve access to jobs, retail and cultural opportunities for both residents and visitors. The shift in more sustainable forms of transport could also support air quality and climate policies. However, this policy does limit land for other types of development, such as housing, but does also afford greater connectivity which could unlock other areas for development.

### 8.16.5 LLDC response

The LLDC indicated that as this is a strategic policy, specific details and commitments are included throughout the rest of the section.

### 8.16.6 Residual assessment

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### 8.16.7 HRA Implications

No likely significant effect at this stage.

Table 41: Policy SP.4: Planning for and securing transport and utility infrastructure to support growth and convergence

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		++	+	+	n/a	n/a	+	n/a	+	+	n/a						
Medium Term		++				+	+		++	+	+	n/a	n/a	+	n/a	+	+	n/a						
Long Term		++				+	+		++	+	++	n/a	n/a	+	n/a	+	+	n/a						
Direct / Indirect		D				I	D		D	I	D	n/a	n/a	D	n/a	I	I	n/a						
Temporary / Permanent		P				P	P		P	P	P	n/a	n/a	P	n/a	P	P	n/a						
Local / Greater London / Wider Region / Global		L/G L/W R				L	WR		L/G L/W R	L, GL	L/G L/W R	n/a	n/a	L, GL	n/a	GL	L	n/a						
<b>EQIA</b>																								
Short Term	O	++	+	n/a	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a		n/a	O						
Medium Term	O	++	+	n/a	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a		n/a	O						
Long Term	O	++	+	n/a	+	+	n/a	+	+	+	+	n/a	n/a	+	n/a		n/a	O						
Direct / Indirect	D & I	D	I	n/a	I	D	n/a	D	I	I	D	n/a	n/a	D	n/a		n/a	D						
Temporary / Permanent	P	P	P	n/a	P	P	n/a	P	P	P	P	n/a	n/a	P	n/a		n/a	P						
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L	L	n/a	L/G L/W R	L/G L/W R	L, GL	L/G L/W R	n/a	n/a	L, GL	n/a		n/a	L and GL						
<b>HIA</b>																								
Short Term	O		+		n/a		n/a		+	+				+	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Medium Term	O		+		n/a		n/a		+	+				+	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Long Term	O		+		n/a		n/a		+	+				+	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Direct / Indirect	D & I		I		n/a		n/a		I	I				D	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Temporary / Permanent	P		P		n/a		n/a		P	P				P	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		n/a		n/a		L/G L/W R	L, GL				L, GL	n/a		n/a	n/a		n/a	n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		O															
Medium Term				n/a			n/a		O															
Long Term				n/a			n/a		O															
Direct / Indirect				n/a			n/a		L															
Temporary / Permanent				n/a			n/a		T															
Local / Greater London / Wider Region / Global				n/a			n/a		L/G L/W R															

**Objectives**

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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.17 Policy T.2: Transport improvements

### 8.17.1 Policy context

#### 8.17.1.1 Policy summary

This policy sets out transport improvements for the LLDC Planning Area, as outlined in the infrastructure delivery plan. Development proposals must not compromise the implementation of transport schemes, and must support the Healthy Streets Approach to improve cycling, walking and public transport. The policy protect existing bus stops and routes.

#### 8.17.1.2 Policy change

This policy has been updated to now include a reference to the Healthy Streets Approach, as set out in the draft new London Plan.

### 8.17.2 Initial assessment

The policy seeks to improve access to other parts of the locality, region and wider London. Development proposals will support and give regard to the healthy street indicators thus enabling older people, children and young people, people with disabilities to experience an inclusive physical environment that enables people to be at the heart of transport and streets development.

The policy refers to the implementation of the Healthy Streets Approach. Implementing the approach will deliver a healthier, more inclusive design supporting walking, cycling and sustainable travel. It will benefit health by reducing transport noise, air pollution, dangerous road, social isolation and severance effects. It will also support more cycle parking and the promotion of healthy walking routes to local destinations, such as schools. Improvements to transport through bus routes and stops near to cultural and historic venues could also improve access to educational and cultural opportunities.

The delivery of transport improvements will support anticipated growth over the Plan period. This includes protecting existing bus stops and ensuring that new developments capitalise on the improved design of transport infrastructure. Appropriate transport infrastructure will support housing delivery, and improve residential amenity. This could play a role in reducing overcrowding and homelessness, along with a range of wider positive health outcomes.

The integration of land use and transport planning will ensure that development proposals do not restrict the growth of transport infrastructure in the future. The policy will result in benefits to the Greater London area, through improvements to Stratford Station Access, other underground stations and the A12.

This policy supports economic growth by ensuring the area is well connected and therefore appealing to businesses by enabling residents to access employment opportunities and access retail and leisure facilities, thereby increasing consumer

traffic and local spending. Ensuring the area has the appropriate transport infrastructure helps the area to compete on a national and potentially international basis for investment. The construction of transport infrastructure will also create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Supporting public transport improvements could help reduce private car usage long-term. This could benefit local air quality and help to reduce inequalities in terms of access to clean air. Reducing emissions could be beneficial to vulnerable people who live, learn or work near busy roads. The provision of Healthy Streets will also encourage use of cycling, walking and public transport, which will reduce CO<sub>2</sub> emissions and help support emissions reduction targets across London.

The policy requires development proposals to demonstrate how they relate to the Healthy Streets indicators and support the increase of cycling, walking and public transport which are modes of transport which indirectly benefit biodiversity and the green space network, and therefore commuters' and residents' access to areas of biodiversity. The Healthy Streets Approach also aims to improve the local environment for travel, which could include biodiversity benefits such as street trees and parklets.

### 8.17.3 Recommendations

The policy could make specific reference to inclusive and safe access, particularly associated with public transport and active travel schemes. This could include measures such as appropriate lighting, night services to accommodate shift workers, and inclusive design of pavements and train stations. Reference could also be made to improving connectivity between residential areas, key employment sites and social infrastructure.

The policy could go further than general transport improvements and commit to aspects such as electric buses and cycle paths. It should also refer to transport noise levels and commit to keeping these at a minimum for new and existing residents.

### 8.17.4 Cumulative

This policy closely aligns with those relating to development, housing and economic growth as it seeks to unlock land and attract business, residents and visitors alike to the local area.

### 8.17.5 LLDC Response

The LLDC advised that due to the importance of safety and resilience, there is a separate policy on this in Section 8 of the Local Plan, which supports wider policies.

Local connectivity and accessibility continues to be a priority throughout section 7 and through the Infrastructure Delivery Plan.

#### **8.17.6 Residual assessment**

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

#### **8.17.7 HRA Implications**

No likely significant effect at this stage.

Table 42: Policy T.2: Transport improvements

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		++	+	+	n/a	+	+	n/a	++	O	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term		++				++	+		++	+	+	n/a	+	+	n/a	++	O	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term		++				++	+		++	+	+	n/a	+	+	n/a	++	O	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect		D				D	I		D	I	D	n/a	I	D	n/a	D	I	n/a	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	P		P	P	P	n/a	P	P	n/a	P	P	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				GL	L		L/G L	L, GL	L/G L/W R	n/a	L, GL	L, GL	n/a	GL	L	n/a	n/a	L/G L	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	++	++	++	n/a	+	+	+	++	++	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+		n/a	+
Medium Term	++	++	++	n/a	+	+	+	++	++	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+		n/a	+
Long Term	++	++	++	n/a	+	+	+	++	++	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+		n/a	+
Direct / Indirect	D	D	D	n/a	I	I	I	D	D	I	D	n/a	I	D	n/a		n/a	n/a	n/a	I	I		n/a	D
Temporary / Permanent	P	P	P	n/a	P	P	P	P	P	P	P	n/a	P	P	n/a		n/a	n/a	n/a	P	P		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	L/L G/W R	L/G L/W R	n/a	L/G L	L	L	L/L G/W R	L/G L	L, GL	L/G L/W R	n/a	L, GL	L, GL	n/a		n/a	n/a	n/a	L/G L	L, GL		n/a	L and GL
<b>HIA</b>																								
Short Term	++		++		+		+		O	+				+	n/a		n/a	n/a		+	+	n/a		n/a
Medium Term	++		++		+		+		O	+				+	n/a		n/a	n/a		+	+	n/a		n/a
Long Term	++		++		+		+		O	+				+	n/a		n/a	n/a		+	+	n/a		n/a
Direct / Indirect	D		D		I		I		I	I				D	n/a		n/a	n/a		I	I	n/a		n/a
Temporary / Permanent	P		P		P		P		T	P				P	n/a		n/a	n/a		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		L		L	L, GL				L, GL	n/a		n/a	n/a		L/G L	L	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			+		++															
Medium Term				n/a			+		++															
Long Term				n/a			+		++															
Direct / Indirect				n/a			I		D															
Temporary / Permanent				n/a			P		P															
Local / Greater London / Wider Region / Global				n/a			L		L/G L															

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- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.18 Policy T.4: Managing development and its transport impacts to promote sustainable transport choices, facilitate local connectivity and prioritise pedestrians and cyclists

### 8.18.1 Policy context

#### 8.18.1.1 Policy summary

This policy aims to improve sustainable transport options in the LLDC Planning Area, reduce private car use and promote the Healthy Streets Approach to increase cycling and walking.

#### 8.18.1.2 Policy change

This policy has been amended since the previous 2015 LLDC Local Plan to include reference to the Healthy Streets Approach.

### 8.18.2 Initial assessment

The policy facilitates local connectivity and prioritises pedestrians and cyclists by promoting the Healthy Streets Approach. The policy strongly supports an inclusive design and barrier-free environment, supporting improved connectivity for older people, children and young people and people with disabilities. This will enable people to be at the heart of transport planning and streets development. It will also benefit the health of residents by reducing transport noise, air pollution, dangerous road, social isolation and severance effects, improving streets for all users. It will also provide more cycle parking and promote healthy walking routes to local destinations such as schools, giving residents an attractive alternative to the car to undertake a sustainable means of travel and therefore improving health and wellbeing.

The policy supports the provision of sustainable transport to support growth over the Plan period. This is likely to facilitate the delivery of housing, and could help to reduce wider issues such as homelessness and overcrowding. High quality infrastructure, including sustainable and active options, can support a range of positive health outcomes. The policy also supports the sustainable use of land through a holistic approach to the integration of land use and transport. It encourages active transport through target-based Travel Plans and sets requirements for developments to maximise connectivity opportunities, invest in the transport network to promote active travel, reduce car ownership and encourage the use of waterways.

The promotion of Healthy Streets and infrastructure which prioritises walking and cycling provides opportunities for inclusive design to be implemented in developments to connect to the transport network, and through this will also enhance the character of the area. A Healthy Streets Approach also supports the creation and maintenance of an attractive public realm. The policy does not however explicitly refer to the safety or attractiveness of new routes.

This policy supports economic growth by ensuring the area is well connected via sustainable transport choices and therefore appealing to businesses by enabling residents to access employment opportunities and retail and leisure facilities, increasing consumer traffic/ local spending. Ensuring the area has the appropriate transport infrastructure helps the area to compete on a national and potentially international basis for investment.

Improvements to public transport which facilitate local connectivity can also enable visitors to engage more with local heritage sites and cultural venues. This will result in increased access and enjoyment of the site for groups who may struggle to travel without public transport options.

Promoting sustainable transport choices could minimise the reliance on the private car, which should reduce local pollutant concentrations. However, achieving the air quality standards is dependent upon baseline local air quality and level of improvement needed. Reducing emissions would be beneficial to vulnerable people who live, learn or work near busy roads. This would also help to reduce CO<sub>2</sub> emissions, supporting London's target to reduce CO<sub>2</sub> emissions by 2025 and move the city towards low/zero carbon. Sustainable transport choices also have the potential to reduce private car usage on roads, and therefore reduce noise emission.

The policy requires development proposals to demonstrate how they relate to the Healthy Streets indicators and support the increase of cycling, walking and public transport which are modes of transport which indirectly protect the natural environment. A potential conflict from using waterways for transport may be with the ecological function of the Blue-Ribbon Network.

### 8.18.3 Recommendations

The policy could be extended to include a focus on areas of deprivation where inequalities are likely to be worse. Reference could also be made to improving connectivity to employment sites and key services. This could include ensuring key cycling and walking routes link residential communities with services and opportunities.

Although the policy supports appropriate transport infrastructure for a range of users, it could refer to inclusive and safe access. This could include measures such as appropriate lighting, and inclusive design of pavements.

The policy could also encourage benefits to biodiversity and natural capital through innovative measures and green infrastructure.

### 8.18.4 Cumulative

This policy closely aligns with other health and wellbeing policies by promoting walking and cycling as key transport modes. It supports economic policies by encouraging growth and increasing accessibility to employment, retail and housing opportunities. However, the promotion of the use of the waterways for transport could conflict with policies supporting protection of the Blue Ribbon Network.

### **8.18.5 LLDC Response**

The LLDC advised that the design policies support innovative methods, and that the plan should not commit to specific technologies which could be superseded in the future by newer technologies. Local connectivity is an issue throughout the area, hence not specifying particular zones or areas for focus, as the wider local connectivity network is needed in order to link up with these.

### **8.18.6 Residual assessment**

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### **8.18.7 HRA Implications**

No likely significant effect at this stage.

Table 43: Policy T.4: Managing development and its transport impacts

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				++	++		++	+	+	n/a	n/a	+	n/a	++	+	n/a	n/a	+	n/a	n/a	n/a	n/a
Medium Term		++				++	++		++	+	+	n/a	n/a	+	n/a	++	+	n/a	n/a	+	n/a	n/a	n/a	n/a
Long Term		++				++	++		++	+	+	n/a	n/a	+	n/a	++	+	n/a	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect		D				D	D		D	I	D	n/a	n/a	D	n/a	D	I/D	n/a	n/a	D	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	P		P	P	P	n/a	n/a	P	n/a	P	P	n/a	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	GL		L/G L/W R	L, GL	L/G L/W R	n/a	n/a	L, GL	n/a	GL	GL	n/a	n/a	L/G L	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	++	++	++	?	+	++	++	++	+	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+		n/a	+
Medium Term	++	++	++	?	+	++	++	++	+	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+		n/a	+
Long Term	++	++	++	?	+	++	++	++	+	+	+	n/a	+	+	n/a		n/a	n/a	n/a	+	+		n/a	+
Direct / Indirect	D	D	D	I	I	D	I	D	I	I	D	n/a	I	D	n/a		n/a	n/a	n/a	D	I		n/a	D
Temporary / Permanent	P	P	P	T	P	P	P	P	P	P	P	n/a	p	P	n/a		n/a	n/a	n/a	P	P		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	L	L	L	GL	L/G L/W R	L/G L/W R	L, GL	L/G L/W R	n/a	L, GL	L, GL	n/a		n/a	n/a	n/a	L/G L	L, GL		n/a	L and GL
<b>HIA</b>																								
Short Term	++		++		+		++		O	+				+	n/a		n/a	n/a		+	+	n/a		n/a
Medium Term	++		++		+		++		O	+				+	n/a		n/a	n/a		+	+	n/a		n/a
Long Term	++		++		+		++		O	+				+	n/a		n/a	n/a		+	+	n/a		n/a
Direct / Indirect	D		D		I		I		I	I				D	n/a		n/a	n/a		D	I	n/a		n/a
Temporary / Permanent	P		P		P		P		P	P				P	n/a		n/a	n/a		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		GL		L/G L/W R	L, GL				L, GL	n/a		n/a	n/a		L/G L	I, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				?			++		+															
Medium Term				?			++		+															
Long Term				?			++		+															
Direct / Indirect				I			I		D															
Temporary / Permanent				T			P		P															
Local / Greater London / Wider Region / Global				L			GL		L/G L/W R															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.19 Policy T.5: Street network

### 8.19.1 Policy context

#### 8.19.1.1 Policy summary

This policy sets out the structure and hierarchy of streets and networks within the LLDC. It prioritises walking and cycling as the key transport modes for the LLDC Planning Area and ensures that new, traffic-generating developments are located in appropriate places.

#### 8.19.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include the Healthy Streets agenda, in line with the draft New London Plan (2018).

### 8.19.2 Initial assessment

The policy supports sustainable land use through the provision of a 'street hierarchy' to ensure that streets are appropriately used, and developments are sympathetic to this use. This will ensure development proposals consider the integration of land use and transport, as well as the effects of development on the transport network.

Development and street networks that increase journeys undertaken through walking, cycling and public transport are likely to reduce congestion and traffic. The 'Street Types' approach seeks to improve the balance between movement and living functions, weighing in favour of living and walking and cycling. This will positively support a modal shift to sustainable and active modes of transport. As it prioritises walking and cycling first, then public transport, this policy may however have a negative impact on less-mobile individuals, who rely on public transport. This should be considered and mitigated where possible.

This policy supports economic growth by ensuring the area is well connected via sustainable transport choices and therefore appealing to businesses by enabling residents to access employment opportunities and retail and leisure facilities, thereby increasing consumer traffic/ local spending. Ensuring the area has the appropriate transport infrastructure helps the area to compete on a national and potentially international basis for investment. The policy also helps to minimise a key barrier to employment (i.e transport) by ensuring appropriate infrastructure to enable sustainable transport choices are in place. This policy supports healthy workplaces by promoting/increasing the availability of sustainable transport choices and promoting Healthy Streets, with the associated environmental and health benefits for the local amenity and users.

The policy supports high quality street infrastructure, and sustainable travel more broadly. This includes located development in areas underpinned by a sufficient transport network. This is likely to enhance connectivity for communities, and encourage linkages to key services and economic opportunities. By supporting walking and cycling infrastructure, this encourages affordable travel options for lower income communities.

Prioritising pedestrians and cyclists, followed by public transport on streets should discourage private car usage, which should reduce local pollutant concentrations. However, achieving the air quality standards is dependent upon baseline local air quality and level of improvement needed. Reducing emissions could be beneficial to vulnerable people who live, learn or work near busy roads. Similarly, a reduction in private car usage on roads would also contribute to reduced noise pollution.

Increasing the proportion of cycle lanes and pedestrian walkways at the expense of roads can potentially reduce the total hard-standing surfaces and increase the area of green space. This has the potential to reduce surface water flooding by increasing rates of natural infiltration and increasing capacity of existing sewers. SuDS features such as soakaways and swales may be specified in the proposed green areas to comply with the London Plan's SuDS hierarchy. Increasing cycling and walking will indirectly promote sensory environments by reducing noise and air pollution and benefit biodiversity and the green space network, and therefore commuters' and residents' access to areas of biodiversity.

### 8.19.3 Recommendations

The policy could make specific reference to inclusive and safe access, particularly associated with public transport and active travel schemes. This could include measures such as appropriate lighting, and inclusive design of pavements and train stations. This is particularly important in ensuring groups feel safe and comfortable during the day and night. Reference could also be made to improving connectivity between residential areas, key employment sites and social infrastructure. The policy should directly benefit biodiversity by encouraging innovative measures and green infrastructure.

### 8.19.4 Cumulative

This policy aligns with other health and wellbeing policies by promoting walking and cycling as key transport modes. It supports economic policies by encouraging growth and increasing accessibility to employment, retail and housing opportunities.

### 8.19.5 LLDC Response

The LLDC advised that the design policies support innovative methods, and that the plan should not commit so specific technologies which could be superseded in the future by newer technologies. The LLDC also advised that due to the importance of safety and resilience, there is a separate policy on this in Section 8 of the Local Plan, which supports wider policies

### 8.19.6 Residual assessment

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### 8.19.7 HRA Implications

No likely significant effect at this stage.

Table 44: Policy T.5: Street network

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	n/a		++	+	+	n/a	n/a	+	n/a	++	+	+	+	+	n/a	n/a	n/a	n/a
Medium Term		++				+	n/a		++	+	+	n/a	n/a	+	n/a	++	+	+	+	+	n/a	n/a	n/a	n/a
Long Term		++				+	n/a		++	+	+	n/a	n/a	+	n/a	++	+	+	+	+	n/a	n/a	n/a	n/a
Direct / Indirect		D				I	n/a		D	I	D	n/a	n/a	D	n/a	D	I/D	I/D	I/D	I	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	n/a		P	P	P	n/a	n/a	P	n/a	P	P	P	P	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	n/a		L, GL, WR	L, GL	L, GL	n/a	n/a	L, GL	n/a	GL	WR	L	L	L/G L	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	++	++	++	?	+	+	n/a	++	O	+	+	n/a	n/a	+	n/a		n/a		+	+	n/a		n/a	+
Medium Term	++	++	++	?	+	+	n/a	++	O	+	+	n/a	n/a	+	n/a		n/a		+	+	n/a		n/a	+
Long Term	++	++	++	?	+	+	n/a	++	O	+	+	n/a	n/a	+	n/a		n/a		+	+	n/a		n/a	+
Direct / Indirect	D	D	D	I	I	I	n/a	D	I	I	D	n/a	n/a	D	n/a		n/a		I/D	I	n/a		n/a	D
Temporary / Permanent	P	P	P	T	P	P	n/a	P	P	P	P	n/a	n/a	P	n/a		n/a		P	P	n/a		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	L	L	L	n/a	L/G L/W R	L, GL, WR	L, GL	L, GL	n/a	n/a	L, GL	n/a		n/a		L	L/G L	n/a		n/a	L and GL
<b>HIA</b>																								
Short Term	++		++		n/a		n/a		O	+				+	n/a		n/a	n/a		+	n/a	n/a		n/a
Medium Term	++		++		n/a		n/a		O	+				+	n/a		n/a	n/a		+	n/a	n/a		n/a
Long Term	++		++		n/a		n/a		O	+				+	n/a		n/a	n/a		+	n/a	n/a		n/a
Direct / Indirect	D		D		n/a		n/a		I	I				D	n/a		n/a	n/a		I	n/a	n/a		n/a
Temporary / Permanent	P		P		n/a		n/a		P	P				P	n/a		n/a	n/a		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		n/a		n/a		L, GL, WR	L, GL				L, GL	n/a		n/a	n/a		L/G L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				?			n/a		+															
Medium Term				?			n/a		+															
Long Term				?			n/a		+															
Direct / Indirect				I			n/a		D															
Temporary / Permanent				T			n/a		P															
Local / Greater London / Wider Region / Global				L			n/a		L, GL, WR															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.20 Policy T.8: Parking and parking standards in new development

### 8.20.1 Policy context

#### 8.20.1.1 Policy summary

This policy supports the provision of car-free development or low levels of car parking in new development. Where sites are being redeveloped, it also encourages a reduction in car parking provision. The policy ensures parking does not take precedent over the provision of open space and the public realm. It does however protect parking for blue-badge holders, in line with London Plan standards.

#### 8.20.1.2 Policy change

The policy has been amended since the 2015 LLDC Local Plan to incorporate car-free development in line with the draft New London Plan (2018).

### 8.20.2 Initial assessment

The policy supports car free developments which encourage walking and cycling. This will help to facilitate more active lifestyles and improve wider health and wellbeing. Limited parking however may restrict opportunities for older people, parents with young children and others with long-term health or mobility issues, who are not eligible for a blue badge. However, the policy does support good design and requires consideration of accessibility for cars and public transport through Car Park Design and Management Plans.

The policy also does not consider changes in demographic in areas that may attract young people and adults who will go on to have families and become older in time. The provision of electric vehicle charging points and spaces is unlikely to benefit lower income communities, as these cars are typically more expensive than the average diesel vehicle. This could limit equitable access to social, economic and environmental infrastructure.

The policy supports sustainable land use by seeking to reduce the requirement for land to be used as parking, while ensuring that developments are accessible and integrated within the transport network. In areas where there is no or very limited parking, this policy may prevent some groups accessing employment opportunities. This policy does support healthier workplaces by promoting car free environments, provision of club car spaces and provision of electric vehicle infrastructure and therefore helping to create Healthy Streets, with the associated environmental and health benefits for the local amenity and users.

The policy supports sustainable growth by ensuring housing development is located in areas well connected by public transport, and within close proximity to town centres/ services.

Reducing private car parking spaces and introducing new car club spaces will help to reduce private car ownership. Incorporating Electric Vehicle (EV) charging points should encourage EV take up. These proposals should reduce local pollutant concentrations and help to reduce inequalities in terms of access to clean air. However, achieving the air quality standards is dependent upon baseline local air quality and level of improvement needed. The roll-out of EV charging infrastructure will also promote a transition to a low carbon economy by enabling the residents to purchase and charge their EV's locally. Electric vehicles use c.30% the energy of their equivalent diesel model. Similarly, the reduction in private car usage on roads should also reduce associated noise emissions.

For redevelopment, the policy states that the level of parking provision should be reduced. A net reduction in hardstanding surface areas will help improve storm water drainage conditions as more water may be infiltrated at the expense of sewer-diverted storm water. The policy also states that proposed provision of car parking should not take precedence over the incorporation of open space, protecting and enhancing local biodiversity.

### 8.20.3 Recommendations

The policy could consider future-proofing, based on expected development demographics. Parking permit prices should also be inclusive and ensure they do not exclude and create inequalities for residents who may need a car (e.g. those with reduced mobility or with young children). The policy should also consider that EV cars are more expensive than diesel or petrol models and therefore this may not reach lower-income groups.

This policy could also do more to minimise parking near to public realm (e.g. high streets) and sensitive receptors (e.g. schools). Removing off-street parking on high streets and near schools and improving public transport connectivity could help to further facilitate active travel.

The policy should include an additional reference to proposed provision of car parking not taking precedence over areas of biodiversity interest in the most urbanised parts of the city.

### 8.20.4 Cumulative

This policy closely aligns with health and wellbeing policies by encouraging more active forms of transport, such as walking and cycling. The policy also supports development and economic growth policies by ensuring new developments are in well-connected areas. However, equalities issues have been raised in relation to limiting car-parking for individuals who do not necessarily qualify for a blue-badge, but may still require a private vehicle.

### **8.20.5 LLDC Response**

The LLDC advised that parking policies follow those of the draft New London Plan and parking permits are the responsibility of the local boroughs.

### **8.20.6 Residual assessment**

The policy has been amended to provide more detail. However, this does not change the initial appraisal. The appraisal is set out as above.

### **8.20.7 HRA Implications**

No likely significant effect at this stage.

Table 45: Policy T.8: Parking and parking standards in new development

IIA Element	IIA Objectives/																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		?				+	n/a		+	n/a	+	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a
Medium Term		?				+	n/a		+	n/a	+	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a
Long Term		?				+	n/a		+	n/a	+	n/a	n/a	+	n/a	n/a	+	+	+	n/a	n/a	n/a	n/a	n/a
Direct / Indirect		I				D	n/a		I	n/a	D	n/a	n/a	D	n/a	n/a	I	I	I	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	n/a		P	n/a	P	n/a	n/a	P	n/a	n/a	P	P	P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/WR				L	n/a		L	n/a	L	n/a	n/a	L, GL	n/a	n/a	L	L	L	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	++	?	n/a	?	n/a	+	+	n/a	-	-	n/a	n/a	+	n/a		n/a		+	n/a	n/a		n/a	+
Medium Term	+	++	?	n/a	?	n/a	+	+	n/a	-	-	n/a	n/a	+	n/a		n/a		+	n/a	n/a		n/a	+
Long Term	+	++	?	n/a	+	n/a	+	+	n/a	-	-	n/a	n/a	+	n/a		n/a		+	n/a	n/a		n/a	+
Direct / Indirect	D & I	I	I	n/a	I	n/a	I	I	n/a	D	D	n/a	n/a	D	n/a		n/a		I	n/a	n/a		n/a	D
Temporary / Permanent	P	P	P	n/a	P	n/a	P	P	n/a	P	P	n/a	n/a	P	n/a		n/a		P	n/a	n/a		n/a	P
Local / Greater London / Wider Region / Global	L/G L/WR	L/G L/WR	L/G L/WR	n/a	L	n/a	L	L/G L/WR	n/a	L, GL	L	n/a	n/a	L, GL	n/a		n/a		L	n/a	n/a		n/a	L and GL
<b>HIA</b>																								
Short Term	++		++		n/a		+		n/a	+				+	n/a		n/a	+		+	n/a	n/a		n/a
Medium Term	++		++		n/a		+		n/a	+				+	n/a		n/a	+		+	n/a	n/a		n/a
Long Term	++		++		n/a		+		n/a	+				+	n/a		n/a	+		+	n/a	n/a		n/a
Direct / Indirect	D		I		n/a		I		n/a	I				D	n/a		n/a	I		D	n/a	n/a		n/a
Temporary / Permanent	P		P		n/a		P		n/a	P				P	n/a		n/a	P		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/WR		L/G L/WR		n/a		L		n/a	L, GL				L, GL	n/a		n/a	L		L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			+		O															
Medium Term				n/a			+		O															
Long Term				n/a			+		O															
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Local / Greater London / Wider Region / Global				n/a			L		L															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
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  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
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  - To maximise accessibility for all in and around London
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  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
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  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.21 Policy T.9: Providing for pedestrians and cyclists

### 8.21.1 Policy context

#### 8.21.1.1 Policy summary

This policy aims to increase walking and cycling by improve pedestrian and cyclist infrastructure which is safe, attractive, secure and well-connected. This supports the Mayor's aim of 80% of journeys conducted by foot, cycle or public transport by 2041.

#### 8.21.1.2 Policy change

The policy has been amended since the 2015 LLDC Local Plan to incorporate the Healthy Streets Approach, in line with the draft New London Plan (2018).

### 8.21.2 Initial assessment

The policy strongly supports active lifestyles and connectivity for all. It supports the delivery of strategic walking and cycling routes, thereby encouraging physical exercise. Safe environments for pedestrians and cyclists can also help to reduce social isolation by providing safe, attractive and accessible routes for all users. The policy also supports wayfinding and signage, which is particularly important for people with cognitive impairments or hidden disabilities.

The policy supports the sustainable use of land by delivering sustainable transport infrastructure which prioritises cycling and walking, so that it is safe, direct, coherent and attractive. The policy emphasises connections with local destinations and transport nodes, improving connectivity and increasing the proportion of sustainable journeys. This will also help to reduce traffic congestion.

By ensuring the area is well connected via safe walking and cycling routes and providing appropriate cycling infrastructure and facilities, this policy supports economic growth. It makes areas and developments appealing to businesses and employees by enabling residents to safely access employment opportunities and retail and leisure facilities, thereby increasing consumer traffic/local spending. This policy also encourages healthy and productive workplaces by creating safe routes for employees to/from workplaces and encouraging active lifestyles with the associated health benefits for employees.

Promoting and supporting safe routes for walking and cycling will minimise reliance on the private car, which should reduce local pollutant concentrations and help to reduce inequalities in terms of access to clean air. Reducing emissions could be beneficial to vulnerable people who live, learn or work near busy roads. The use of sustainable models of transport also supports London's targets to reduce its CO<sub>2</sub> emissions and becoming a low/zero carbon economy.

Increasing the proportion of cycle lanes and pedestrian walkways at the expense of roads can potentially reduce the total hard-standing surfaces and increase the area

Table 46: Policy T.9: Providing for pedestrians and cyclists

of green space. This has the potential to reduce surface water flooding by increasing rates of natural infiltration and increasing capacity of existing sewers. SuDS features such as soakaways and swales may be specified in the proposed green areas to comply with the London Plan's SuDS hierarchy.

Cycling, walking and public transport are modes of transport which indirectly benefit biodiversity and the green space network, and therefore commuters' and residents' access to areas of biodiversity. The reduction in private car usage on roads, by encouraging walking and cycling, also has potential to reduce road noise and associated noise pollution.

### 8.21.3 Recommendations

The policy could refer to specific best practice regarding crime and safety. The policy also does not consider the importance of day time and night time users, and should encourage well-lit cycle paths and walkways to enable users to feel safe 24 hours a day.

The policy should directly benefit this biodiversity by encouraging innovative measures and green infrastructure (such as sedum roofed bus stops) to relate to the Healthy Streets indicators and support the increase of safe and attractive cycling, walking and public transport.

### 8.21.4 Cumulative

This policy closely aligns with others relating to health and wellbeing by encouraging active forms of transport.

### 8.21.5 LLDC Response

The LLDC advised that due to the importance of safety and resilience, there is a separate policy on this in Section 8 of the Local Plan, which supports wider policies

### 8.21.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

### 8.21.7 HRA Implications

No likely significant effect at this stage.

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				++	++		++	+	+	n/a	n/a	+	n/a	++	+	+	n/a	+	n/a	n/a	n/a	n/a
Medium Term		+				++	++		++	+	+	n/a	n/a	+	n/a	++	+	+	n/a	+	n/a	n/a	n/a	n/a
Long Term		+				++	++		++	+	+	n/a	n/a	+	n/a	++	+	+	n/a	+	n/a	n/a	n/a	n/a
Direct / Indirect		D				D	D		D	I	D	n/a	n/a	D	n/a	D	D	I/D	n/a	I	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	P		P	P	P	n/a	n/a	P	n/a	P	P	P	n/a	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	L		L/G L/W R	L, GL	L/G L	n/a	n/a	L, GL	n/a	GL	GL	L	n/a	L/G L	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	++	++	++	+	+	++	+	O	n/a	+	n/a	n/a	+	n/a		n/a		n/a	+	n/a		n/a	+
Medium Term	+	++	++	++	+	+	++	+	O	n/a	+	n/a	n/a	+	n/a		n/a		n/a	+	n/a		n/a	+
Long Term	+	++	++	++	+	+	++	+	O	n/a	+	n/a	n/a	+	n/a		n/a		n/a	+	n/a		n/a	+
Direct / Indirect	D	D	D	D	I	D	D	D	I	n/a	D	n/a	n/a	D	n/a		n/a		n/a	I	n/a		n/a	D
Temporary / Permanent	P	P	P	T/P	P	P	P	P	T	n/a	P	n/a	n/a	P	n/a		n/a		n/a	P	n/a		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	L	L	L	L	L/G L/W R	L	n/a	L/G L	n/a	n/a	L, GL	n/a		n/a		n/a	L/G L	n/a		n/a	L/G L
<b>HIA</b>																								
Short Term	++		++		n/a		++		O	+				+	n/a		n/a	+		+	n/a	n/a		n/a
Medium Term	++		++		n/a		++		O	+				+	n/a		n/a	+		+	n/a	n/a		n/a
Long Term	++		++		n/a		++		O	+				+	n/a		n/a	+		+	n/a	n/a		n/a
Direct / Indirect	D		D		n/a		D		I	I				D	n/a		n/a	I/D		I	n/a	n/a		n/a
Temporary / Permanent	P		P		n/a		P		P	P				P	n/a		n/a	P		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		n/a		L		L	L, GL				L, GL	n/a		n/a	L		L/G L	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				++			++		++															
Medium Term				++			++		++															
Long Term				++			++		++															
Direct / Indirect				D			D		D															
Temporary / Permanent				T/P			P		P															
Local / Greater London / Wider Region / Global				L			L		L/G L/W R															

**Objectives**

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## 8.22 Policy S.1: Health and wellbeing

### 8.22.1 Policy context

#### 8.22.1.1 Policy summary

This policy supports the use of design and access statements to ensure all new developments are able to demonstrate how they contribute positively to health and wellbeing.

#### 8.22.1.2 Policy change

The policy has been amended since the 2015 LLDC Local Plan to include the Healthy Streets Approach in line with the draft New London Plan (2018).

### 8.22.2 Initial assessment

The policy positively supports health and wellbeing and encourages the use of the Healthy Streets Approach and more active modes of travel. It will enable Londoners and residents to explore neighbouring communities and access leisure and sport facilities in the local area. It could also contribute to reducing inequalities in the wider area and develop healthier lifestyles by designing an environment which encourages an active lifestyle, improving both mental and physical health.

The policy supports applications for major developments to describe how the scheme will contribute to health and wellbeing. This includes information on schools, health services, community facilities, leisure activities, local shops and services, and publicly accessible open space. The policy also ensures developments integrate public transport networks. This is likely to deliver accessible housing that encourages a sense of community and enhances the amenity value of the community.

Design and Access statements will help to ensure development schemes consider how they manage the use of land and deliver improvements, particularly in relation to transport infrastructure. These statements will require developments to consider the impact on access to community and transport infrastructure, while providing opportunities for enhancement and improvement. This will promote regeneration and reduce adverse impacts from large developments. These statements will also ensure that developments are well integrated within the cityscape and encourage inclusive design in terms of accessibility to community and transport infrastructure.

This policy supports economic growth by ensuring the area is well connected via sustainable transport choices, and therefore appealing to businesses by enabling residents to access employment opportunities and retail and leisure facilities. This therefore could increase consumer traffic/local spending. Ensuring appropriate connections to walking, cycling and public transport networks will help the area to compete for investment. A focus on health and wellbeing improvements should also help people with a range of needs, including those with mental or physical conditions/disabilities, and therefore indirectly support employment opportunities. The Design and Access statements must also demonstrate that the development can be

adequately accessed by prospective users. This policy also directly supports healthy workplaces by requiring developments to demonstrate how schemes will contribute to the health and wellbeing of those who will work within, or in the vicinity of the development.

Design and Access Statement must also include information on access to schools and community facilities, which will help to ensure that appropriate consideration is given to the sufficiency, or otherwise, of education and training provision.

Major development applications that must specify the scheme's contribution to health and wellbeing should consider cultural heritage and the historic environment. As a result, developments should seek to improve access to affordable cultural activities and encourage skill-building in the cultural sector for Londoners to take up careers in. Identifying the schemes impact on the historic environment will also help understand the importance of heritage sites within a community. This can help support many groups, especially disadvantaged and marginalised individuals, who would benefit from having a sense of place and connection to their community. As a result, it can inform design and planning to ensure access to these sites and educational programmes which convey the types of heritage represented within the area.

Promoting sustainable transport choices could minimise the reliance on the private car, which should reduce local pollutant concentrations and help to reduce inequalities in terms of access to clean air. In particular, reducing emissions could be beneficial to vulnerable people who live, learn or work near busy roads. However, achieving air quality standards is dependent upon baseline local air quality and level of improvement needed. The policy also highlights the importance of green open spaces and parks which aim to minimise the effects of the urban heat island by increasing evapotranspiration from trees and lowering surface and air temperatures. Encouraging large developments to create communities that promote sustainable transport modes will also help to reduce CO2 emissions from the transport sector, supporting London's wider targets to reduce emissions by 2025.

This policy identifies how major development schemes should include parks and open spaces and how major development schemes should demonstrate how they will deliver improvements, which in turn benefit London's natural capital by reducing noise and air pollution, as well as barriers to species movement.

Parks and publicly open spaces are proposed as part of a wider health and wellbeing improvement to communities. Surface water discharge to waterbodies and sewers decreased as increasing green space allows for greater infiltration, improving the quality of receiving water bodies due to reduction in potential of oil discharge from hard-standing surfaces.

Although agent of change is not explicitly mentioned, the requirement to ensure the development would not significantly adversely affect those who live and/or work within the vicinity is in keeping with the principle of the agent of change. The policy does not directly require mitigation of disturbances from existing noise however the requirement to minimise adverse noise impacts or introduce enhancements to control existing noise sources will be beneficial. Additionally, one of the ten Healthy Streets Indicators is "not too noisy" in relation to reducing the noise impacts of motor traffic.

The policy also requires major development schemes to demonstrate how the site will connect with existing networks via walking, cycling and public transport. This has the potential to reduce private car usage, and therefore associated noise emissions. Information on access to parks and publicly accessible open spaces within new developments also has the potential to improve people's access to quiet/tranquil spaces.

### **8.22.3 Recommendations**

There are no recommendations for this policy.

### **8.22.4 Cumulative**

This policy supports wider growth and development policies by ensuring all new developments contribute to improving health and wellbeing for local communities and visitors.

### **8.22.5 HRA Implications**

No likely significant effect at this stage.

Table 47: Policy S.1: Health and wellbeing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		+	+	+	+	+	+	n/a	++	n/a	+	+	+	+	n/a	n/a	+
Medium Term		++				+	+		+	+	+	+	+	+	n/a	++	n/a	+	+	+	+	n/a	n/a	+
Long Term		++				+	+		+	+	+	+	+	+	n/a	++	n/a	+	+	+	+	n/a	n/a	+
Direct / Indirect		D				I	D		I	I	D	I	I	D	n/a	D	n/a	I	I	D	D	n/a	n/a	D
Temporary / Permanent		P				P	P		P	P	P	P	T	P	n/a	P	n/a	P	P	P	P	n/a	n/a	P
Local / Greater London / Wider Region / Global		L/G L/W R				L	L		L/G L/W R	L, GL	L	L	L	L, GL	n/a	L	n/a	L/G L	L/G L	L/G L	L/G L	n/a	n/a	L
<b>EQIA</b>																								
Short Term	++	++	+	n/a	+	+	+	++	n/a	+	+	+	+	+	++		n/a		+	+	+		n/a	+
Medium Term	++	++	+	n/a	+	+	+	++	n/a	+	+	+	+	+	++		n/a		+	+	+		n/a	+
Long Term	++	++	+	n/a	+	+	+	++	n/a	+	+	+	+	+	++		n/a		+	+	+		n/a	+
Direct / Indirect	D	D	D	n/a		I	D	D	n/a	I	D	I	I	D	D		n/a		I	D	D		n/a	D
Temporary / Permanent	P	P	P	n/a	I	P	P	P	n/a	P	P	P	T	P	P		n/a		P	P	P		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	P	L	L	L/G L/W R	n/a	L, GL	L	L	L	L, GL	L		n/a		L/G L	L/G L	L/G L		n/a	L and GL
<b>HIA</b>																								
Short Term	++		++		n/a		+		n/a	++					+	++		n/a	+		+	+	n/a	+
Medium Term	++		++		n/a		+		n/a	++					+	++		n/a	+		+	+	n/a	+
Long Term	++		++		n/a		+		n/a	++					+	++		n/a	+		+	+	n/a	+
Direct / Indirect	D		D		n/a		D		n/a	D					D	D		n/a	I		D	D	n/a	D
Temporary / Permanent	P		P		n/a		P		n/a	P					P	P		n/a	P		P	P	n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		n/a		L		n/a	L, GL					L, GL	L		n/a	L/G L		L/G L	L/G L	n/a	L
<b>CSIA</b>																								
Short Term				?			+		n/a															
Medium Term				?			+		n/a															
Long Term				?			+		n/a															
Direct / Indirect				I			D		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L			L		n/a															

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## 8.23 Policy S.2 Energy in new development

### 8.23.1 Policy context

#### 8.23.1.1 Policy summary

This policy uses the energy hierarchy to ensure new developments minimise their carbon emissions as far as possible. It ensures all major developments provide an energy strategy and contribute to the carbon off-set fund scheme when targets cannot be met.

#### 8.23.1.2 Policy change

The policy has been amended since the 2015 LLDC Local Plan to include updated targets and changes to the energy requirements in new developments.

### 8.23.2 Initial assessment

This policy supports the reduction of energy requirements and greater energy efficiency within new developments. This includes using renewable energy sources and exploiting local energy resources where possible. This could help to improve insulation and energy efficiency in housing, and play a role in reducing ill-health and fuel poverty. This could contribute to positive health and wellbeing outcomes for residents.

This policy actively promotes the purchase and generation of renewable and sustainable energy. New developments adhering to the most stringent energy efficiency measures will have a direct impact on energy demand reduction and will promote the transition to a low carbon economy. Local renewable generation will enhance resilience of energy supply and address any shortages.

Reducing energy requirements, supplying more energy efficient energy and increasing renewable energy sources where viable should reduce local pollutant emissions and help to reduce inequalities in terms of access to clean air. In particular, reducing emissions could be beneficial to vulnerable people who live, learn or work near CHPs.

This policy aims to minimise the built environments contribution to CO2 emissions by supporting retro-fit schemes and encouraging new developments to embrace energy efficient buildings that support a net zero carbon community. This policy promotes the transition to a low carbon economy and encourages the community to become more energy efficient.

Promoting the use of sustainable energy technologies will prepare communities to better cope with any climate change impacts, and futureproof resilience to changes

that may affect its ability to function during period of extreme weather. Achieving reductions in carbon emissions will contribute to reducing the rate of identified climate change.

The policy does not however currently acknowledge the potential effectiveness of natural capital to help achieve carbon targets in major new developments.

### 8.23.3 Recommendations

The policy should include the carbon sequestration benefits of green infrastructure and certain tree species, making them a valuable tool to new developments achieving net-zero carbon. The policy could then be beneficial to biodiversity.

### 8.23.4 Cumulative

This policy closely aligns with other development and growth policies by ensuring new developments are energy efficient. It also has wider health benefits, reducing the risk of fuel poverty and poorly insulated homes.

### 8.23.5 LLDC Response

The LLDC advised that the recommendation is very specific and does not reflect the requirements of the draft New London Plan, as such it may not be practical or implementable. However, this is something developers could incorporate into energy statements.

### 8.23.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

### 8.23.7 HRA Implications

No likely significant effect at this stage.

Table 48: Policy S.2 Energy in new development

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	n/a		n/a	n/a	+	n/a	n/a	+	+	++	++	n/a	n/a	-	n/a	n/a	n/a	n/a
Medium Term		n/a				n/a	n/a		n/a	n/a	+	n/a	n/a	+	+	++	++	n/a	n/a	-	n/a	n/a	n/a	n/a
Long Term		n/a				n/a	n/a		n/a	n/a	+	n/a	n/a	+	+	++	++	n/a	n/a	-	n/a	n/a	n/a	n/a
Direct / Indirect		n/a				n/a	n/a		n/a	n/a	D	n/a	n/a	D	I	D	D/I	n/a						
Temporary / Permanent		n/a				n/a	n/a		n/a	n/a	P	n/a	n/a	P	P	P	P	n/a						
Local / Greater London / Wider Region / Global		n/a				n/a	n/a		n/a	n/a	L	n/a	n/a	L <sub>GL</sub>	L	L	L	n/a						
<b>EQIA</b>																								
Short Term	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		+		n/a	-	n/a		n/a	n/a
Medium Term	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		+		n/a	-	n/a		n/a	n/a
Long Term	+	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+	n/a		+		n/a	-	n/a		n/a	n/a
Direct / Indirect	D	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	D	n/a		I		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P	n/a		P		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	n/a	L	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L <sub>GL</sub>	n/a		L		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		+		n/a		n/a	n/a				+	n/a		+	n/a		-	n/a	n/a		n/a
Medium Term	n/a		n/a		+		n/a		n/a	n/a				+	n/a		+	n/a		-	n/a	n/a		n/a
Long Term	n/a		n/a		+		n/a		n/a	n/a				+	n/a		+	n/a		-	n/a	n/a		n/a
Direct / Indirect	n/a		n/a		D		n/a		n/a	n/a				D	n/a		D	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a		n/a		P		n/a		n/a	n/a				P	n/a		P	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L/GL		n/a		n/a	n/a				L <sub>GL</sub>	n/a		L	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.24 Policy S.6: Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure

### 8.24.1 Policy context

#### 8.24.1.1 Policy summary

This policy outlines the importance of digital connectivity. It sets a requirement to safeguard existing structures, co-locate services and ensure there is space for future provisions.

#### 8.24.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to include reference to greater connectivity which supports other aims and targets, including the Healthy Streets Approach and zero-carbon city.

### 8.24.2 Initial assessment

"The policy supports the provision of digital infrastructure and safeguarding existing communications infrastructure to maximise technological opportunities. This will facilitate the delivery of adaptable, well connected homes and will promote equitable access to digital infrastructure. This is particularly important for less mobile residents, older people, lower-income communities and will support home working.

The provision of new and improvement of existing digital infrastructure offers the opportunity to support London's reputation as an international city of learning, research and development, and also to increase digital learning to meet the needs of business. Improved internet connectivity is relied upon greatly in the education sector for online learning and research. This may also contribute to improving learning and skills of residents to access employment opportunities and help support adult education.

This policy also aims to use digital innovation to reach zero-carbon targets and promote sustainable technologies.

Increasing digital connectivity through co-locating services on existing structures will help prevent the need for additional materials and infrastructure, which has the potential to reduce the generation of construction, demolition and excavation waste and prolong the useful lifetime of infrastructure assets.

### 8.24.3 Recommendations

The policy should consider how access to digital infrastructure can be improved and enhanced for those with sensory and cognitive impairments. It is also noted that increased digital connectivity can lead to both increased and decreased social interaction, which should be managed accordingly. Digital connectivity should be

promoted where it enhances social integration and provides opportunity to interact with the local community and community infrastructure.

The policy should consider how improved digital connectivity and integration into peoples' lifestyles could affect safety and put people and organisations at risk of cybercrime.

The policy should expand further and clarify how using digital technologies will help support targets to reduce CO<sub>2</sub>. There is also an opportunity to upgrade existing street infrastructure with more energy efficient systems.

This policy could expand on the establishment of digital mobile infrastructure and connect it to the implementation of big data analytics and smart predictive maintenance, which will ensure that the telecommunications infrastructure can be optimised and kept at its highest performance for longer.

### 8.24.4 Cumulative

This policy supports economic and educational policies, ensuring that digital infrastructure is sufficient and reliable in a digital age.

### 8.24.5 LLDC Response

The LLDC advised that the policy meets the requirements of the draft New London Plan around ducting and is aimed at enabling innovative and future technology whilst not committing to specific technologies that may become out of date in the future. This section of the plan also includes a policy around safety and resilience which is focused on the wider security and safety agenda.

### 8.24.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

### 8.24.7 HRA Implications

No likely significant effect at this stage.

Table 49: Policy S.6: Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	n/a		n/a	+	+	+	n/a	n/a	n/a	++	O	n/a	n/a	n/a	n/a	n/a	+	n/a
Medium Term		n/a				n/a	n/a		n/a	+	+	+	n/a	n/a	n/a	++	O	n/a	n/a	n/a	n/a	n/a	+	n/a
Long Term		n/a				n/a	n/a		n/a	+	+	+	n/a	n/a	n/a	++	O	n/a	n/a	n/a	n/a	n/a	+	n/a
Direct / Indirect		n/a				n/a	n/a		n/a	D	D	D	n/a	n/a	n/a	I	I	n/a	n/a	n/a	n/a	n/a	D	n/a
Temporary / Permanent		n/a				n/a	n/a		n/a	P	P	P	n/a	n/a	n/a	P	p	n/a	n/a	n/a	n/a	n/a	P	n/a
Local / Greater London / Wider Region / Global		n/a				n/a	n/a		n/a	L, GL	L, GL	L, GL	n/a	n/a	n/a	W R	L	n/a	n/a	n/a	n/a	n/a	L	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	n/a	?	n/a	n/a	+	+	+	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	n/a	?	n/a	n/a	+	+	+	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	n/a	?	n/a	n/a	+	+	+	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I	n/a	D	n/a	n/a	D	D	D	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	n/a	P	n/a	n/a	P	P	P	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/ GL	n/a	W R	n/a	n/a	L, GL	L	L, GL	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		n/a		?		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a		n/a		n/a		?		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a		n/a		n/a		?		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a		n/a		n/a		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a		n/a		n/a		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		n/a		W R		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			?		n/a															
Medium Term				n/a			?		n/a															
Long Term				n/a			?		n/a															
Direct / Indirect				n/a			D		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			W		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.25 Policy S.10: Flood Risk

### 8.25.1 Policy context

#### 8.25.1.1 Policy summary

The flood risk policy requires developers to provide assessments showing that the flood risk to the community is reduced following development and that any new developments will be required to be resilient to any residual flood risk or includes mitigation measures to minimise the risk of flooding at the site and up and down stream of the development. Policy change

#### 8.25.1.2 Policy change

This policy was originally combined with sustainable drainage in the 2015 LLDC Local Plan. This has since been split and a standalone flood risk policy produced.

### 8.25.2 Initial assessment

The policy supports the increased supply of housing, by ensuring the appropriate measures are taken to facilitate low risk development within Flood Zones 2 or 3. The need for site specific flood risk assessment hydraulic modelling and high quality design could help to facilitate the delivery of house building that meets the needs of Londoners. This could help to increase the supply of housing, and reduce homelessness and overcrowding. An increased vulnerability to flood risk however could cause adverse health and wellbeing outcomes, particularly for higher risk groups such as older people, those with existing health conditions, young children and pregnant women.

The policy is a benefit to design through ensuring that flood risk is appropriately assessed and that steps are taken to ensure that individuals and their property is protected from the risk of flooding.

Flooding events can have an adverse economic impact, causing wide scale damage and interruption/delays to economic activity. By applying appropriate flood risk management, through flood risk assessments and restricting building in high risk areas, this policy could help ensure the LLDC Planning Area and East London remains productive and resilient.

Discharge to surface & ground water bodies, as well as to sewers will be reduced as a result of this policy. Therefore the quantity of poor quality water (i.e. water including oil run off from hardstanding surfaces) will be decreased, in compliance with the WFD.

The policy also aims to reduce the impact of flooding on people and property by suggesting finished floor levels should be at least 300 mm above the 1 in 100y (plus climate change) flood level.

It is stated within the policy that development proposals must be designed to reduce vulnerability to climate change however the functionality of green infrastructure (bioswales etc.) is omitted.

### 8.25.3 Recommendations

The policy has the potential to be a direct benefit to this objective if inclusion was made to the functionality of innovate green infrastructure (Bioswales etc.) with regard to flood risk. Development proposals may then be more compelling in efforts to reduce vulnerability to climate change.

### 8.25.4 Cumulative

This policy closely aligns with the flood risk policy. It also supports wider economic policies by ensuring the LLDC Planning Area is attractive and safe to use and minimises the risk of disruption from incidents and disasters.

### 8.25.5 LLDC Response

The LLDC advised that this policy enables use of appropriate technology within development, which may include more innovative green infrastructure solutions.

### 8.25.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

### 8.25.7 HRA Implications

No likely significant effect at this stage.

Table 50: Policy S.8: Flood Risk

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	++	++	-	n/a	n/a	n/a	n/a
Medium Term		n/a				n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	++	++	-	n/a	n/a	n/a	n/a
Long Term		n/a				n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	++	++	-	n/a	n/a	n/a	n/a
Direct / Indirect		n/a				n/a	n/a		n/a	I	D	n/a	n/a	n/a	D	n/a	n/a	D	D	D	n/a	n/a	n/a	n/a
Temporary / Permanent		n/a				n/a	n/a		n/a	P	P	n/a	n/a	n/a	P	n/a	n/a	P	P	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		n/a				n/a	n/a		n/a	L, GL	L/ GL /W	n/a	n/a	n/a	W R	n/a	n/a	GL	GL	L/ GL	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a		++	n/a	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a		++	n/a	n/a		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a		++	n/a	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I		n/a		D	n/a	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P		n/a		P	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/ GL /W	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L		n/a		GL	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		?		n/a		n/a	+				n/a	n/a		n/a	++		n/a	n/a	n/a		n/a
Medium Term	n/a		n/a		?		n/a		n/a	+				n/a	n/a		n/a	++		n/a	n/a	n/a		n/a
Long Term	n/a		n/a		?		n/a		n/a	+				n/a	n/a		n/a	++		n/a	n/a	n/a		n/a
Direct / Indirect	n/a		n/a		I		n/a		n/a	I				n/a	n/a		n/a	D		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a		n/a		P		n/a		n/a	P				n/a	n/a		n/a	P		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L/ GL /W R		n/a		n/a	L, GL				n/a	n/a		n/a	GL		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
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  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.26 Policy S.11 Sustainable drainage measures and flood protections

### 8.26.1 Policy context

#### 8.26.1.1 Policy summary

Surface water run-off from development sites should be restricted and managed using sustainable drainage techniques.

Development proposals which block watercourses will not be permitted without mitigation.

Development proposals should also maintain and/or improve existing flood defence structures, or create new ones if required.

#### 8.26.1.2 Policy change

This policy was originally combined with flood risk in the 2015 LLDC Local Plan. This has since been split up and a stand alone sustainable drainage policy produced.

### 8.26.2 Initial assessment

The policy supports the increased supply of housing, by ensuring the appropriate measures are taken to facilitate low risk development within flood zones or areas of poor drainage. The requirement for development proposals to consider the need for improved and enhanced flood defences could help to unlock land that has capacity for housing development. This will help to meet the long term needs of Londoners, and could underpin economic competitiveness.

Developments will only be supported if they have considered and identified suitable flood protection measures and will support climate resilience within the community, by providing sufficient flood mitigation measures.

The policy actively reduces discharge to surface & ground water bodies, as well as to sewers. This is done by suggesting runoff rate should be as close to Green Field equivalent as possible. This will ensure the quantity of poor quality water (i.e. water including oil run off from hard standing surfaces) will be decreased, in compliance with the WFD.

The policy aims to reduce sources of flood risk. It promotes the maintenance of existing flood defence structures, recommends where necessary the specification of new flood risk protection measures, and proposes that watercourses should not be obstructed by new developments.

The policy directly benefits London's natural capital by promoting sustainable drainage techniques as a first choice for new developments, in particular those techniques that benefit habitat and landscapes, as well as amenity and recreation uses.

The appropriate use of SuDS in restricting uncontrolled surface water run-off will reduce mobilisation of land contamination and pollution of watercourses.

### 8.26.3 Recommendations

The policy should include sustainable flood defence structures (such as re-naturalised river banks) as first choice where a development proposal is dependent on the provision, improvement or repair of a river wall or other flood defence structure. This also provides opportunities to raise awareness of the natural environment and create areas of biodiversity interest.

The policy should also reference the Blue-Ribbon Network, ensuring that discharge doesn't negatively impact it.

Ground contamination can be a restricting factor to the use of an infiltration drainage scheme, however this should not preclude the use of other SuDS options.

### 8.26.4 LLDC Response

The LLDC advised that this policy does provide for pollution mitigation, and although not described as the blue-ribbon network, it does reference the water network in the LLDC area.

### 8.26.5 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

### 8.26.6 HRA Implications

No likely significant effect at this stage.

Table 51: S.11 Sustainable drainage measures and flood protections

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	++	++	+	n/a	+	n/a	n/a
Medium Term		n/a				n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	++	++	+	n/a	+	n/a	n/a
Long Term		n/a				n/a	n/a		n/a	+	+	n/a	n/a	n/a	++	n/a	n/a	++	++	+	n/a	+	n/a	n/a
Direct / Indirect		n/a				n/a	n/a		n/a	I	D	n/a	n/a	n/a	D	n/a	n/a	D	D	D	n/a	D	n/a	n/a
Temporary / Permanent		n/a				n/a	n/a		n/a	P	P	n/a	n/a	n/a	P	n/a	n/a	P	P	P	n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global		n/a				n/a	n/a		n/a	L, GL	L/G L/W R	n/a	n/a	n/a	WR	n/a	n/a	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L	n/a	n/a
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a		++	+	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a		++	+	n/a		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	+		n/a		++	+	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	I		n/a		D	D	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	P		n/a		P	P	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/G L/W R	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	L		n/a		L/G L/W R	L/G L/W R	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		n/a		n/a		n/a	+				n/a	n/a		n/a	++		+	n/a	n/a		n/a
Medium Term	n/a		n/a		n/a		n/a		n/a	+				n/a	n/a		n/a	++		+	n/a	n/a		n/a
Long Term	n/a		n/a		n/a		n/a		n/a	+				n/a	n/a		n/a	++		+	n/a	n/a		n/a
Direct / Indirect	n/a		n/a		n/a		n/a		n/a	I				n/a	n/a		n/a	D		D	n/a	n/a		n/a
Temporary / Permanent	n/a		n/a		n/a		n/a		n/a	P				n/a	n/a		n/a	P		P	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		n/a		n/a		n/a	L, GL				n/a	n/a		n/a	L/G L/W R		L/G L/W R	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

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## 8.27 Policy S.12 Resilience, safety and security

### 8.27.1 Policy context

#### 8.27.1.1 Policy summary

This policy outlines the approach to managing resilience and safety in the LLDC Planning Area. This includes managing risks such as terrorism, flooding and fire. The policy highlights the importance of using design to design out crime, and the requirement for security and safety measures to encourage sustainable forms of transport.

#### 8.27.1.2 Policy change

This is a new policy that was not part of the 2015 LLDC Local Plan.

### 8.27.2 Initial assessment

This policy supports the development of a safe and resilient environment to enable residents and visitors to access leisure, employment and health facilities without the fear of crime. The policy encourages inclusion and gives local residents an opportunity to connect and develop a sense of ownership. The development of safe cycle and walking routes will also promote more active lifestyles in the community.

This policy outlines the LLDC's approach to managing risk and resilience. It considers threats such as terrorism, but also wider measures to improve people's feelings of safety. The LLDC Planning Area, particularly around Stratford and The Olympic Park, is a key area for tourists and visitors and therefore consideration of threats, whether big or small, is paramount to the successful management of these places. Using methods to design out crime is also an important measure to reduce overall levels of crime and the perception of safety within communities. This can help to reduce social isolation and severance in communities.

High quality, safe and resilient developments could facilitate the delivery of adaptable housing, and help to encourage a sense of community and amenity at the local level. The improved design and safety of streets and the public realm could help to promote equitable access to services, and improve connectivity for residential development. A safe and inclusive environment is particularly important for higher risk groups such as women, older people, those with limited mobility, ethnic minorities and LGBTQ groups.

The policy and the supporting text do not directly reference health, however the support for well-designed, safe and resilient developments could help to improve the wellbeing, comfort and security of residents. This could facilitate a range of positive outcomes for health and wellbeing objectives.

Emergencies and threats, such as fire, flood and terrorism have the potential to cause wide scale damage and cause interruption/delays to economic activity. Applying appropriate measures to minimise and mitigate against emergencies and threats could help ensure the LLDC Planning Area and East London remains productive and resilient.

This policy works with many agency bodies to ensure there are measures in place to help the local area continue to function during periods of extreme weather such as flooding or risk of fires from drought/warm weather events. Mitigation measures that include encouragement of cycling and walking in the area and thus reducing greenhouse gas emissions will be supported by the police departments to ensure that these sustainable modes of transport are safe mechanisms of travel for the general public.

The policy actively aims to reduce sources of flood risk. It mandates that a flood risk assessment (FRA) should be carried out for developments in Flood Zones 2 and 3 to seek to identify sources of, and to minimise, flood risk.

The policy highlights how security and safety measures should support and enhance the Healthy Streets vision, and thereby supporting sustainable transport modes. These in turn are of benefit to the natural environment by reducing noise and air pollution.

### 8.27.3 Recommendations

There are no recommendations for this policy.

### 8.27.4 Cumulative

This policy closely aligns with the flood risk policy. It also supports wider economic policies by ensuring the LLDC Planning Area is attractive and safe to use and minimises the risk of disruption from incidents and disasters.

### 8.27.5 HRA Implications

No likely significant effect at this stage.

Table 52: S.12 Resilience, safety and security

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				n/a	+		n/a	+	+	n/a	n/a	n/a	++	+	n/a	n/a	++	-/+	n/a	n/a	n/a	n/a
Medium Term		+				n/a	+		n/a	+	+	n/a	n/a	n/a	++	+	n/a	n/a	++	-/+	n/a	n/a	n/a	n/a
Long Term		+				n/a	+		n/a	+	+	n/a	n/a	n/a	++	+	n/a	n/a	++	-/+	n/a	n/a	n/a	n/a
Direct / Indirect		D				n/a	I		n/a	D	I	n/a	n/a	n/a	D	I	n/a	n/a	D	I	n/a	n/a	n/a	n/a
Temporary / Permanent		P				n/a	P		n/a	P	P	n/a	n/a	n/a	P	P	n/a	n/a	P	P	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/WR				n/a	L		n/a	L, GL	L	n/a	n/a	n/a	L	GL	n/a	n/a	GL	L	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	+	+	+	n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a		++	n/a	n/a		n/a	n/a
Medium Term	+	+	+	+	+	n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a		++	n/a	n/a		n/a	n/a
Long Term	+	+	+	+	+	n/a	+	+	n/a	n/a	+	n/a	n/a	n/a	n/a		n/a		++	n/a	n/a		n/a	n/a
Direct / Indirect	I	D	I	D	I	n/a	I	D	n/a	n/a	I	n/a	n/a	n/a	n/a		n/a		D	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	T/P	P	n/a	P	P	n/a	n/a	P	n/a	n/a	n/a	n/a		n/a		P	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/WR	L/G L/WR	L/G L/WR	L/G L/WR	L	n/a	L	L/G L/WR	n/a	n/a	L	n/a	n/a	n/a	n/a		n/a		GL	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		+		+		+		n/a	+				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	+		+		+		+		n/a	+				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	+		+		+		+		n/a	+				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	I		I		I		I		n/a	D				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	P				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/WR		L/G L/WR		L		L		n/a	L, GL				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				++			+		n/a															
Medium Term				++			+		n/a															
Long Term				++			+		n/a															
Direct / Indirect				D			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L/WR			L		n/a															

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## 8.28 Site Allocation 2.4 Chobham Farm North

### 8.28.1 Policy context

#### 8.28.1.1 Policy summary

This site allocation outlines the provision of a new residential development at Chobham Farm North, including open space and improved transport (pedestrian and vehicle) links.

#### 8.28.1.2 Policy change

This is a new site allocation, which was previously not part of the 2015 LLDC Local Plan.

### 8.28.2 Initial assessment

The site allocation encourages a fair and inclusive city by enabling families to access affordable housing. The 50% threshold encourages families on low income to access housing, therefore contributing to reducing social exclusion and poverty. The site allocation promotes opportunities for more active lifestyles due to the presence of external amenity spaces and improvements to street scene and safe pedestrian crossings.

The delivery of new housing, including a significant element of family housing and an affordable housing threshold of 50% is likely to facilitate the delivery of much needed homes in London, and contribute to meeting a range of accommodation needs. The increase in supply of housing could also play a role in reducing homelessness and overcrowding.

The construction of residential units on this site will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Any new development presents the opportunity to employ SuDS and other measures to reduce the existing use of the public storm water sewer. Furthermore, water supply may be reduced if rainwater harvesting is used allowing water to be used in toilet flushing, for example.

The site allocation is for a residential development including external private or shared amenity space. This may have the potential to improve people's access to quiet/tranquil spaces if the external amenity space is classed as such.

### 8.28.3 Recommendations

The site allocation could make reference to high quality design of housing, to ensure that health and wellbeing outcomes associated with new development are maximised.

### 8.28.4 Cumulative

This is a site allocation which is supported by broader policies in the LLDC Local Plan, relevant to housing, economic growth and transport.

### 8.28.5 LLDC Response

The LLDC advised that good design principles are addressed in other policies, such as SP.3 Integrating the natural and built environment.

### 8.28.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy, the appraisal is set out as above.

### 8.28.7 HRA Implications

No likely significant effect at this stage.

Table 53: Site Allocation 2.4 Chobham Farm

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				?	?		n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a
Medium Term		++				?	?		n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a
Long Term		++				?	?		n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a
Direct / Indirect		D				?	?		n/a	D	D	n/a	n/a	n/a	n/a	n/a	n/a	I	I	n/a	D	n/a	n/a	n/a
Temporary / Permanent		P				?	?		n/a	T	P	n/a	n/a	n/a	n/a	n/a	n/a	P	P	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L				?	?		n/a	L, GL, WR	L/G L/ WR	n/a	n/a	n/a	n/a	n/a	n/a	L	L	n/a	L/G L	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	++	++	++	+	+	?	?	++	+	+	?	?	n/a	n/a	n/a		n/a		+	+	n/a		n/a	n/a
Medium Term	++	++	++	+	+	?	?	++	+	+	?	?	n/a	n/a	n/a		n/a		+	+	n/a		n/a	n/a
Long Term	++	++	++	++	+	?	?	++	+	+	?	?	n/a	n/a	n/a		n/a		+	+	n/a		n/a	n/a
Direct / Indirect	D	D	D	D	D	?	?	D	I	D	D	D	n/a	n/a	n/a		n/a		I	D	n/a		n/a	n/a
Temporary / Permanent	P	P	P	T/P	P	?	?	P	P	T	P	P	n/a	n/a	n/a		n/a		P	P	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	L	L/G L/ WR	?	?	L/G L	L	L, GL, WR	L	L	n/a	n/a	n/a		n/a		L	L	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	++		++		+		?		n/a	n/a				n/a	n/a		n/a	+		+	n/a	n/a		O
Medium Term	++		++		+		?		n/a	n/a				n/a	n/a		n/a	+		+	n/a	n/a		O
Long Term	++		++		+		?		n/a	n/a				n/a	n/a		n/a	+		+	n/a	n/a		O
Direct / Indirect	D		D		D		?		n/a	n/a				n/a	n/a		n/a	I		D	I	n/a		D
Temporary / Permanent	P		P		P		?		n/a	n/a				n/a	n/a		n/a	P		P	P	n/a		P
Local / Greater London / Wider Region / Global	L/G L		L/G L		L		?		n/a	n/a				n/a	n/a		n/a	L		L	L	n/a		L
<b>CSIA</b>																								
Short Term				n/a			?		+															
Medium Term				n/a			?		+															
Long Term				n/a			?		+															
Direct / Indirect				n/a			?		I															
Temporary / Permanent				n/a			?		P															
Local / Greater London / Wider Region / Global				n/a			?		L															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.29 Policy 3.1: Stratford Metropolitan Centre

### 8.29.1 Policy context

#### 8.29.1.1 Policy summary

This policy promotes Stratford as an International Centre, outlining the importance of providing office space, night-time economy uses, residential housing, cultural activities and educational opportunities.

#### 8.29.1.2 Policy change

This is a new policy, which was not part of the 2015 LLDC Local Plan.

### 8.29.2 Preferred option

#### 8.29.3 Initial assessment

The policy supports the delivery of new residential accommodation in appropriate locations throughout the centre. The supporting text states that this will be away from key shopping areas, and where located outside of identified plots, should support retail and night-time economy functions. The increase in housing delivery could help to meet the needs of Londoners. Depending on the type and quantum of new housing delivered, this policy could also play a role in reducing overcrowding and homelessness.

The policy strongly supports sustainable land use by seeking to develop and grow the metropolitan centre, including on brownfield sites, where there are existing transport networks available including those which are connected to the night tube and will enhance the night time economy. This policy will influence the wider region as it will help Stratford become an International Centre, as supported by the draft New London Plan. However, the policy should recognise that high density development can impact different groups of people negatively.

Designating Stratford as an International Centre will help to deliver new buildings and regeneration to modern design standards, and will enhance the townscape and character of the area. The policy supports the retention of the spatial diversity of communities through the promotion of the metropolitan centre as an International Centre. This will improve the vibrancy of the area and instil a sense of place for those who live and work in the area.

The policy supports development including retail, employment and cultural uses. The creation of additional economic development has the potential to increase productivity, deliver economic benefits and diversify the economy in this area and to increase employment opportunities for residents including the long-term and youth unemployed. Further mixed-used developments also offer an opportunity to minimise barriers to employment around transport and childcare and support working families by providing employment opportunities close to residences.

Construction in the Metropolitan Centre area will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy will directly support improved participation by all in cultural activities. This is owing to the central location of Stratford and the ease of access to public transport. Moreover, the development of the night time and cultural economy will ensure that a range of cultural activities are always available to enhance the scope of audience and participation, such as for those that work full-time throughout the day. Stratford Waterfront will also be supported as a new culture and education district and as a future location of town centre boundary extension further promoting social integration through heightened integration of a diversity of new town-centre users.

Any new development presents the opportunity to employ SuDS and other measures to reduce the existing utilisation of the public storm water sewer. Furthermore, water supply may be reduced if rainwater harvesting is used allowing water to be used in toilet flushing, for example.

### 8.29.4 Recommendations

The policy could refer to high quality design of residential uses, to ensure compatibility with town centres uses, particularly night-time economy. High-quality, well-designed houses can help to achieve a range of positive health and wellbeing outcomes. The policy could also reference affordable and adaptable options, to ensure a range of housing needs are met. The delivery of social and physical infrastructure should also be considered to support new residential development.

The policy should recognise that high density development should be provisioned in such a way that it does not affect different groups of people.

The policy should ensure that development proposals are adequately designed to improve the legibility and ease of use of the built environment for people with sensory or cognitive impairments. The policy could also commit to providing a safe metropolitan centre, particularly with regards to the night time economy, such as appropriate street lighting or 24-hour transport links.

The policy/supporting text could make specific reference to the provision of flexible floorspace within mixed-use developments to encourage and support business start-ups, SMEs, social enterprise and voluntary sectors.

### 8.29.5 Cumulative

The policy closely aligns with economic policies relating to the wider LLDC. Stratford is key economic centre within the LLDC Planning Area and the retail, business and transport infrastructure it provides are vital. This policy links particularly to Policy B.2

'Thriving Town, neighbourhood and local centres' through the development of Stratford as a potential future International Centre. This will enhance the vibrancy of the centre and encourage greater tourism, residential use and engagement, and investment from local community groups, visitors, tourists and other user groups.

#### **8.29.6 LLDC Response**

The LLDC advised that issues such as design and housing are covered by other policies in the Local Plan and that specific economic suggestions, such as flexible workspace, are supported by policy B.1.

#### **8.29.7 Residual assessment**

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

#### **8.29.8 HRA Implications**

No likely significant effect at this stage.

Table 54: Policy 3.3: Stratford Metropolitan Centre

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				++	+		n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	
Medium Term		+				++	++		n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	
Long Term		+				++	++		n/a	+	++	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	n/a	
Direct / Indirect		I				D	I		n/a	D, T	D	n/a	D	n/a	n/a	n/a	n/a	I	I	n/a	n/a	n/a	n/a	n/a	
Temporary / Permanent		P				P	P		n/a	P	P	n/a	P	n/a	n/a	n/a	n/a	P	P	n/a	n/a	n/a	n/a	n/a	
Local / Greater London / Wider Region / Global		L/G L/W R				WR	WR		n/a	L, GL, WR	L/G L	n/a	L, GL, WR	n/a	n/a	n/a	n/a	L	L	n/a	n/a	n/a	n/a	n/a	
<b>EQIA</b>																									
Short Term	+	+	O	n/a	+	+	+	+	+	+	+	?	n/a	+	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Medium Term	+	+	O	n/a	+	+	+	+	+	+	+	?	n/a	+	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Long Term	+	+	O	n/a	+	+	+	+	+	+	+	?	n/a	+	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I	I	I	I	D, T	D	n/a	D	n/a	n/a		n/a		I	n/a	n/a		n/a	n/a	
Temporary / Permanent	P	P	P	n/a	P	P	P	P	P	P	P	n/a	P	n/a	n/a		n/a		P	n/a	n/a		n/a	n/a	
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L	GL	GL	L/G L/W R	L	L, GL, WR	L	n/a	L, GL, WR	n/a	n/a		n/a		L	n/a	n/a		n/a	n/a	
<b>HIA</b>																									
Short Term	+		O		?		+		n/a	n/a				n/a	n/a		n/a	+		n/a	n/a	n/a		n/a	n/a
Medium Term	+		O		?		+		n/a	n/a				n/a	n/a		n/a	+		n/a	n/a	n/a		n/a	n/a
Long Term	+		O		?		+		n/a	n/a				n/a	n/a		n/a	+		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I		I		D		I		n/a	n/a				n/a	n/a		n/a	I		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	P		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L		GL		n/a	n/a				n/a	n/a		n/a	L		n/a	n/a	n/a		n/a	n/a
<b>CSIA</b>																									
Short Term				?			+		n/a																
Medium Term				?			+		n/a																
Long Term				?			+		n/a																
Direct / Indirect				?			I		n/a																
Temporary / Permanent				?			P		n/a																
Local / Greater London / Wider Region / Global				?			GL		n/a																

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.30 Policy 3.2: Stratford High Street Planning Area

### 8.30.1 Policy context

#### 8.30.1.1 Policy summary

This policy focuses on a specific Planning Area within the LLDC Planning Area. It aims to create a lively mixed-use development along Stratford High Street, highlighting the provision of cultural and night-time economy uses, in addition to residential development.

#### 8.30.1.2 Policy change

This policy has been changed since the 2015 LLDC Local Plan to include night time and cultural economy in the supporting text and to bring it in line with the draft New London Plan (2018). The policy includes a trigger for the tall buildings policy in this location and it sets out a northern Planning Area where specific new residential products are encouraged.

### 8.30.2 Initial assessment

The policy supports mixed-use development and a range of town centre uses as part of the renewal of Stratford High Street, including residential development where appropriate. The policy places emphasis on appropriate design and fit-out of existing uses to support alternative uses. Depending on the nature of new residential uses, the increased housing supply could also help to reduce overcrowding and homelessness.

The policy supports appropriate use of land through the promotion of Stratford High Street as a high street, rather than a thoroughfare for vehicles. This ensures the regeneration of shops and frontages for the benefit of existing communities. The policy also considers design principles, such as enhancing the character and townscape of the area, increasing the vibrancy and ensuring that inclusive design will consider the needs of a variety of users within the high street context. Additionally, the policy considers the positive impact of incorporating tall buildings into the design as they will benefit land use sustainability.

It is highlighted in the supporting text that the area has many vacant units and poor transport options. Regeneration and encouraging 'life' back into the high street will improve its use and can lead to indirect improvement to perception of safety in the local area and reduce crime rates.

The policy supports accessibility to key services and facilities for residents and visitors in Stratford. Ensuring that there is joined up development and reduction in traffic will enable people with limited mobility, older people and children to safely access retail and leisure facilities.

The creation of additional development has the potential to increase productivity, deliver economic benefits, diversify the economy in this area and increase

employment opportunities for residents including the long-term and youth unemployed. The supporting text highlights that flexible provision should be provided on the ground floor of developments to meet the needs of a wide range of end users and that interim or permanent commercial and leisure uses will be supported. Both elements are beneficial in terms of encouraging business start-ups and supporting the growth of businesses, including SMEs, social enterprises and the voluntary/community sectors. Flexible provision may also support diversification by ensuring that locations are appealing to as wide a range of users as possible.

Further mixed-use developments offer an opportunity to minimise barriers to employment around transport and childcare and support working families by providing employment opportunities close to residences. The supporting text highlights that both interim and permanent community and leisure uses will be welcomed on the ground floor. Permitting interim uses may act as a catalyst for regeneration in the long term, as well as creating employment in the short term.

Construction within this area will create additional economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy indirectly supports the improved accessibility for all to cultural venues through the development of innovative mixed-use products such as culture and night-time economy uses. The central location of Stratford High Street and strong public transportation links, in combination with the improved availability and cultural venues, will enhance connectivity for all. Moreover, the development of venues for both daytime and night-time uses will enhance accessibility for groups with different employment and behavioural patterns. Proposals for mixed-use development along Stratford High Street will also be required to demonstrate that it will enhance the character, townscape and function as a lively main street, thereby improving the quality and condition of the historic environment.

Any new development presents the opportunity to employ SuDS and other measures to reduce the existing use of the public storm water sewer. Furthermore, water supply may be reduced if rainwater harvesting is used allowing water to be used in toilet flushing, for example.

### 8.30.3 Recommendations

The policy should expressly state where good design can create and maintain a safe and attractive public realm whereby people can walk and cycle and use the high street as it is intended to be used.

The policy could strengthen its approach to crime and personal safety by directly addressing the safety issues caused by a lack of crossings, and consider how regeneration can enhance safety by design. It could also specifically reference

measures to improve safety and noise impacts within the night-time economy and to ensure transportation links are improved and accessible.

The policy could also consider inclusive access and design of infrastructure, to ensure that all groups can participate in opportunities.

#### **8.30.4 Cumulative**

This policy focuses on a specific Planning Area within the LLDC Planning Area. It is therefore closely supported by wider economic, regeneration, housing and growth policies.

#### **8.30.5 LLDC Response**

The LLDC advised that additional reference to crime and safety management and the night time economy will be included. The improvement of the public realm and environment will also be strengthened.

#### **8.30.6 Residual assessment**

Amendments to the policy provided further clarification on crime and safety management within the Site Allocation.

#### **8.30.7 HRA Implications**

No likely significant effect at this stage.

Table 55: Policy 3.2: Stratford High Street Policy

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				+	+		n/a	+	+	n/a	+	n/a	n/a	n/a	n/a	+	+	n/a	+	n/a	n/a	n/a
Medium Term		+				+	++		n/a	+	+	n/a	O	n/a	n/a	n/a	n/a	+	+	n/a	O	n/a	n/a	n/a
Long Term		+				+	++		n/a	+	+	n/a	O	n/a	n/a	n/a	n/a	+	+	n/a	O	n/a	n/a	n/a
Direct / Indirect		I				I	D		n/a	D	D	n/a	I	n/a	n/a	n/a	n/a	I	I	n/a	I	n/a	n/a	n/a
Temporary / Permanent		P				P	P		n/a	P, T	P	n/a	T, P	n/a	n/a	n/a	n/a	P	P	n/a	T, P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	L		n/a	L, GL	L/G L	n/a	L	n/a	n/a	n/a	n/a	L	L	n/a	L	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	+	O	+	+	+	+	+	O	+	+	n/a	+	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Medium Term	+	+	O	+	+	+	+	+	O	+	+	n/a	O	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Long Term	+	+	O	+	+	+	+	+	O	+	+	n/a	O	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Direct / Indirect	I	I	I	I	D	D	I	I	I	D	D	n/a	I	n/a	n/a		n/a		I	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	P	P	P	P	P	P	P, T	P	n/a	T, P	n/a	n/a		n/a		P	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	L/G L	L/G L/W R	L	L	L/G L/W R	L/G L	L, GL	L	n/a	L	n/a	n/a		n/a		L	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		O		?		+		n/a	n/a				n/a	n/a		n/a	+		n/a	+	n/a		n/a
Medium Term	+		O		?		+		n/a	n/a				n/a	n/a		n/a	+		n/a	O	n/a		n/a
Long Term	+		O		?		+		n/a	n/a				n/a	n/a		n/a	+		n/a	O	n/a		n/a
Direct / Indirect	I		I		D		I		n/a	n/a				n/a	n/a		n/a	I		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	P		n/a	T, P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		L		n/a	n/a				n/a	n/a		n/a	L		n/a	L	n/a		n/a
<b>CSIA</b>																								
Short Term				+			+		n/a															
Medium Term				++			+		n/a															
Long Term				++			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L			L		n/a															

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  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## **8.31 Site Allocations: SA3.1: Stratford Town Centre West, SA3.2: Stratford Waterfront East, SA3.3: Stratford Waterfront West, SA3.4: Greater Carpenters District, SA3.5: Bridgewater Road, SA3.6: Rick Roberts Way**

### **8.31.1 Policy context**

All six site allocations have been amended since the 2015 LLDC Local Plan. All site allocations refer to the amount of additional homes required and the percentage of affordable homes.

### **8.31.2 Initial appraisal**

The site allocations support the provision of new housing within key Sub-Areas. This will help to facilitate the delivery of much needed housing in London, and will contribute to more mixed and inclusive communities. The increase in housing supply alongside affordable options could also play a role in reducing overcrowding and homelessness.

The site allocations support good design by seeking to conserve and enhance the townscape and preserve the character of the area, while also improving connections within the town. High quality design standards can also reduce the impact on historical assets in appropriate areas by incorporating the protection and enhancement of heritage into design.

The construction of residential units outlined in these site allocations will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might also support economic growth in the LLDC Planning Area and offer additional employment opportunities, including disadvantaged groups. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Any new development presents the opportunity to employ SuDS and other measures to reduce the existing use of the public storm water sewer. Furthermore, water consumption may be reduced if methods, such as rainwater harvesting, allow water to be used in toilet flushing, for example.

### **8.31.3 Recommendations**

There are no recommendations for these site allocations.

### **8.31.4 Cumulative**

This policy closely aligns with a number of LLDC policies, supporting wider economic growth, housing provision and infrastructure delivery by improving connectivity and access across the LLDC Planning Area.

### **8.31.5 HRA Implications**

No likely significant effect at this stage.

Table 56: Site Allocations SA3.1-3.6

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				++	+		n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a	?	n/a	n/a	n/a
Medium Term		+				++	+		n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a	?	n/a	n/a	n/a
Long Term		+				++	+		n/a	+	?	n/a	n/a	n/a	n/a	n/a	n/a	+	+	n/a	?	n/a	n/a	n/a
Direct / Indirect		I				D	I		n/a	D	D	n/a	n/a	n/a	n/a	n/a	n/a	I	I	n/a	I	n/a	n/a	n/a
Temporary / Permanent		P				P	P		n/a	T	P	n/a	n/a	n/a	n/a	n/a	n/a	P	P	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/WR				L	L		n/a	L, GL, WR	L/G L	n/a	n/a	n/a	n/a	n/a	n/a	L	L	n/a	L/G L	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	n/a	+	n/a	+	+	n/a	+	n/a	+	?	n/a	n/a	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Medium Term	+	n/a	+	n/a	+	+	n/a	+	n/a	+	?	n/a	n/a	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Long Term	+	n/a	+	n/a	+	+	n/a	+	n/a	+	?	n/a	n/a	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Direct / Indirect	I	n/a	I	n/a	D	D	n/a	I	n/a	D	D	n/a	n/a	n/a	n/a		n/a		I	n/a	n/a		n/a	n/a
Temporary / Permanent	P	n/a	P	n/a	P	P	n/a	P	n/a	T	P	n/a	n/a	n/a	n/a		n/a		P	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/WR	n/a	L/G L/WR	n/a	L/G L/WR	L	n/a	L/G L/WR	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a		L	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		+		n/a		n/a	n/a					n/a	n/a		n/a	+		n/a	O	n/a	n/a
Medium Term	n/a		n/a		+		n/a		n/a	n/a					n/a	n/a		n/a	+		n/a	O	n/a	n/a
Long Term	n/a		n/a		+		n/a		n/a	n/a					n/a	n/a		n/a	+		n/a	O	n/a	n/a
Direct / Indirect	n/a		n/a		D		n/a		n/a	n/a					n/a	n/a		n/a	I		n/a	I	n/a	n/a
Temporary / Permanent	n/a		n/a		P		n/a		n/a	n/a					n/a	n/a		n/a	P		n/a	P	n/a	n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L/G L		n/a		n/a	n/a					n/a	n/a		n/a	L		n/a	L, GL	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
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- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
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- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
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- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.32 Policy 4.2: Bringing forward new connections to serve new development

### 8.32.1 Policy context

#### 8.32.1.1 Policy summary

This policy outlines the provision of well-connected and accessible transport infrastructure. This include improvements to existing infrastructure and the provision of new. The policy covers road, cycle and pedestrian transport infrastructure.

#### 8.32.1.2 Policy change

This policy has been amended since the 2015 LLDC Local Plan to remove reference to the provision of a cycling superhighway.

### 8.32.2 Initial assessment

The policy supports the promotion of an inclusive city through proposed improvements to accessibility for motorised vehicles, pedestrians and cyclists. These improvements will encourage social integration as access to high streets, the Queen Elizabeth Olympic Park and Stratford Metropolitan Centre are improved. Greater connectivity will help to promote improved access to health and social care services. The policy is likely to contribute to reducing health inequalities and improving mental wellbeing.

The policy strongly supports sustainable land use by supporting the improvement of existing transport infrastructure to improve connections and accessibility for road, cycle and pedestrian travel, while improved connections will be made to several important rail stations. The policy also supports good design through seeking to create and maintain a safe public realm, encouraging people to walk and cycle. This will improve the legibility of the built environment and improve ease of access for people who have sensory or cognitive impairments.

The policy will improve accessibility by supporting new transport links and upgrades to existing services. It will encourage modal shift and more active travel by providing new cycle and pedestrian routes. This may in turn lead to reduced traffic volumes and congestion. The policy may also reduce severance by providing low cost transport options.

Improving existing, and delivering new, connections may indirectly support economic growth by allowing residents to access employment opportunities, making areas more appealing to businesses from a connectivity perspective and by enabling residents to access retail and leisure facilities thereby increasing consumer traffic/local spending. ensuring the area has the appropriate transport infrastructure, helps the area to compete on a national and potentially international basis for investment. This policy will also help to minimise one of the barriers to employment, (i.e. transport), by ensuring appropriate public transport, pedestrian and cycling infrastructure is in place.

The construction of transport infrastructure will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile. This policy could also support healthy workplaces by promoting/increasing accessibility by public transport, walking and cycling and the associated environmental and health benefits for the local amenity and users.

Improvements to pedestrian and cycle lanes could encourage active transport and minimise the reliance on the private car, which should reduce local pollutant concentrations and help to reduce inequalities in terms of access to clean air. Reducing emissions could be particularly beneficial to vulnerable people who live, learn or work near busy roads. The policy text suggests prioritisation of pedestrian and cycle ways, thereby promoting a transition to a low carbon economy by encouraging cycling and walking. Similarly, the promotion of improved pedestrian and cycle ways will help to reduce road traffic and associated road traffic noise. The policy encourages cycle lanes which can reduce the amount of hardstanding surfaces in favour of SuDS and other natural infiltration features. Less storm water may therefore be diverted to public sewers and the risk of pluvial is decreased as their available capacity is increased.

### 8.32.3 Recommendations

This policy could refer explicitly to the safety of transport infrastructure to improve safety and the perceptions of safety. This could include the provision of lighting, or using methods (such as passive surveillance) to design out crime.

### 8.32.4 Cumulative

This policy closely aligns with a number of LLDC policies, supporting wider economic growth, housing provision and infrastructure delivery by improving connectivity and access across the LLDC Planning Area.

### 8.32.5 LLDC Response

The LLDC advised that the recommendations are delivered through other policies, including S.12 Resilience, safety and security and wider transport policies.

### 8.32.6 Residual assessment

No further appraisal required as no changes are proposed to the draft policy. The appraisal is set out as above.

### 8.32.7 HRA Implications

No likely significant effect at this stage.

Table 57: Policy 4.2: Bringing forward new connections to serve new development

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				++	+		+	+	+	n/a	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a
Medium Term		++				++	+		+	+	+	n/a	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a
Long Term		++				++	+		+	+	+	n/a	+	+	n/a	+	+	+	+	n/a	n/a	n/a	n/a	n/a
Direct / Indirect		D				D	D		D	I, D	D	n/a	I, D	D	n/a	I	I	I	I	n/a	n/a	n/a	n/a	n/a
Temporary / Permanent		P				P	P		P	P, T	P	n/a	P	P	n/a	P	P	P	P	n/a	n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				GL	GL		L, GL	L, GL, WR	L/G L	n/a	L, GL, WR	L, GL	n/a	L	L	L	L	n/a	n/a	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	+	++	+	+/?	+	n/a	+	++	O	+	+	n/a	n/a	+	n/a		n/a		+	n/a	n/a		n/a	+
Medium Term	+	++	+	+/?	+	n/a	+	++	O	+	+	n/a	n/a	+	n/a		n/a		+	n/a	n/a		n/a	+
Long Term	+	++	+	++/?	+	n/a	+	++	O	+	+	n/a	n/a	+	n/a		n/a		+	n/a	n/a		n/a	+
Direct / Indirect	I	D	I	D	D	n/a	D	D	I	I, D	D	n/a	n/a	D	n/a		n/a		I	n/a	n/a		n/a	D
Temporary / Permanent	P	P	P	P	P	n/a	P	P	P	P, T	P	n/a	n/a	P	n/a		n/a		P	n/a	n/a		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	L	L/G L/W R	n/a	L	L/G L/W R	L, GL	L	L	n/a	n/a	L, GL	n/a		n/a		L	n/a	n/a		n/a	L
<b>HIA</b>																								
Short Term	++		++		n/a		+		O	+				+	n/a		n/a	+		n/a	n/a	n/a		n/a
Medium Term	++		++		n/a		+		O	+				+	n/a		n/a	+		n/a	n/a	n/a		n/a
Long Term	++		++		n/a		+		O	+				+	n/a		n/a	+		n/a	n/a	n/a		n/a
Direct / Indirect	D		I		n/a		D		I	I				D	n/a		n/a	I		n/a	n/a	n/a		n/a
Temporary / Permanent	P		P		n/a		P		P	P				P	n/a		n/a	P		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		n/a		L		L, GL	L				L, GL	n/a		n/a	L		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				?/+			+		++															
Medium Term				?/+			+		++															
Long Term				?/+			+		++															
Direct / Indirect				D			D		D															
Temporary / Permanent				P			P		P															
Local / Greater London / Wider Region / Global				L			L		L, GL															

**Objectives**

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- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.33 Site Allocation 4.4: Three Mills

### 8.33.1 Policy context

#### 8.33.1.1 Policy summary

This site allocation set outs the approach to management at Three Mills Island, focusing on the protection and management of the existing heritage buildings in the area.

#### 8.33.1.2 Policy change

This is a new site allocation which was not previously part of the 2015 LLDC Local Plan.

### 8.33.2 Initial assessment

This site allocation supports the site renewal, regeneration and conservation of Three Mills Island. This site allocation supports proposals for new development where they demonstrate they preserve or enhance the character of the Conservation Area, and relevant vistas. This site allocation supports the development of a minimum of 100 homes, including an affordable threshold of 50%. This will facilitate the delivery of high quality housing, and will meet a range of accommodation needs.

The conservation of the character of the Three Mills area and heritage assets through this site allocation promotes good design principles and appropriate development, and seeks to retain the spatial diversity of the Three Mills community within the wider context of redevelopment in the area.

The creation of additional development has the potential to increase productivity, deliver economic benefits and diversify the economy in this area, and to increase employment opportunities for residents including the long-term and youth unemployed. Additionally, construction in this area will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This site allocation promotes the protection and enhancement of heritage through the renewal of Three Mills Island, placing emphasis on the restoration and conservation of the existing heritage to preserve the character of the area. This allocation directly supports direct improvements to the quality and condition of the historic environment, through preserving and enhancing the historic landscape and ensuring that no new development can pose significant negative impacts on the landscape. This has positive impacts over the longer term, ensuring that the vitality, townscape and aesthetic quality of the landscape is maintained and enhanced.

### 8.33.3 Recommendations

There were no recommendations for this site allocation.

### 8.33.4 Cumulative

This site allocation is supported by wider, general LLDC policies which focus on growth, redevelopment and heritage.

### 8.33.5 HRA Implications

No likely significant effect at this stage.

Table 58: Site Allocation 4.4: Three Mills

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	+		n/a	+	O	n/a	+	n/a	n/a	n/a								
Medium Term		n/a				n/a	++		n/a	+	O	n/a	+	n/a	n/a	n/a								
Long Term		n/a				n/a	++		n/a	+	O	n/a	+	n/a	n/a	n/a								
Direct / Indirect		n/a				n/a	D		n/a	D	D	n/a	D	n/a	n/a	n/a								
Temporary / Permanent		n/a				n/a	P		n/a	P, T	P	n/a	P	n/a	n/a	n/a								
Local / Greater London / Wider Region / Global		n/a				n/a	GL		n/a	L, GL, W, R	L/ GL	n/a	L	n/a	n/a	n/a								
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	+		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	+		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	+	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	+		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	D	I	I	n/a	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	D		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	P	P	n/a	n/a	P, T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	P		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/ GL/ W/ R	L	L	n/a	n/a	L, GL, W, R	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	L		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		n/a
Medium Term	n/a		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		n/a
Long Term	n/a		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	+	n/a		n/a
Direct / Indirect	n/a		n/a		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	D	n/a		n/a
Temporary / Permanent	n/a		n/a		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L/ GL		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		n/a
<b>CSIA</b>																								
Short Term				O			+		n/a															
Medium Term				O			+		n/a															
Long Term				O			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/ GL			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8.34 Site Allocation 4.5 Bow Goods Yards (Bow East and West)

### 8.34.1 Policy context

#### 8.34.1.1 Policy summary

This site allocation outlines the long-term intensification and development of Strategic Industrial Land (SIL) at Bow Goods Yards. In the long-term this may result in the appropriate release of land, provided the land still provides the equivalent contribution to SIL requirements.

#### 8.34.1.2 Policy change

This is a new site allocation and was not part of the 2015 LLDC Local Plan.

### 8.34.2 Initial assessment

The site allocation supports the opportunity for the release of land at Bow East for alternative uses, including residential. Residential development is proposed via intensification and consolidation, with affordable housing provision in line with Policy H2. This will facilitate the delivery of housebuilding, and will help to meet the diverse housing needs of London. The site allocation supports the agent of change principle to maintain local amenity, and a range of open space provision to encourage a sense of community.

The site allocation supports the sustainable use of land by considering development on SIL, and by making use of the existing freight rail transport network. It seeks to protect the highways network and supports appropriate residential development which can demonstrate links to the Pudding Mill Lane DLR station.

The site allocation supports industrial uses as well as economic diversification in the long term. The creation of additional development has the potential to increase productivity, deliver economic benefits and to increase employment opportunities for residents including the long-term and youth unemployed. Construction in this area will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

The site allocation supports the creation of healthy and safe environment around workplaces by stating that proposed uses must consider noise, air, quality and visual impact. The supporting text emphasises that existing safe routes for pedestrians and

cyclists must be maintained, which will help to ensure that employees can safely access workplaces.

The site allocation directly refers to applying the 'agent of change' principle in respect to intensification and development of rail freight, transport and industrial uses. The site allocation does not require mitigation for current air quality, but pollutant emissions could be reduced through mitigation measures related to proposed developments, increasing access to clean air. Achieving the air quality standards is dependent upon baseline local air quality and level of improvement needed.

Any new development presents the opportunity to employ SuDS and other measures to reduce the existing utilisation of the public storm water sewer. Furthermore, water supply may be reduced if rainwater harvesting is used allowing water to be used in toilet flushing, for example. The site allocation requires any area released at Bow East for non-SIL uses to demonstrate connections to the Greenway and River Lea, including open space provision and an enhanced landscaped setting to these features. This will be of benefit to the natural environment and bring nature closer to people.

The site allocation refers to long term intensification and development of rail freight, transport and industrial uses at the SIL. This could increase night time noise in residential areas. However, it is assumed that it can be demonstrated that there is an acceptable relationship between the rail and other SIL uses and any non-SIL uses proposed, including noise, applying the 'agent of change' principle. Therefore, the site allocation includes a requirement to minimise adverse noise impacts.

#### 8.34.3 Recommendations

The site allocation could refer to supporting social infrastructure such as health and education facilities, to ensure growth is sustainable and promotes local amenity. The site allocation could also refer to inclusive access, particularly for walking routes.

#### 8.34.4 Cumulative

This is a specific site allocation which is supported by wider policies relating to development, economy and industrial land use.

#### 8.34.5 LLDC Response

The LLDC advised that connectivity and the interaction with the wider area is a key part of the principles within this site allocation.

#### 8.34.6 Residual assessment

No further appraisal required as no changes are proposed to the draft text. The appraisal is set out as above.

#### 8.34.7 HRA Implications

No likely significant effect at this stage.

Table 59: Site Allocation 4.5: Bow Goods Yards (Bow East and West)

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				++	n/a		n/a	++	+	n/a	n/a	O	n/a	n/a	+	+	+	O	n/a	n/a	n/a	O
Medium Term		n/a				++	n/a		n/a	++	+	n/a	n/a	O	n/a	n/a	+	+	+	+	n/a	n/a	n/a	O
Long Term		n/a				++	n/a		n/a	++	+	n/a	n/a	O	n/a	n/a	+	+	+	+	n/a	n/a	n/a	O
Direct / Indirect		n/a				D	n/a		n/a	D	D	n/a	n/a	D	n/a	n/a	d	I	I	I	n/a	n/a	n/a	D
Temporary / Permanent		n/a				P	n/a		n/a	P	P	n/a	n/a	P	n/a	n/a	p	P	P	P	n/a	n/a	n/a	P
Local / Greater London / Wider Region / Global		n/a				L	n/a		n/a	L, GL	L/G L	n/a	n/a	L, G L	n/a	n/a		L	L	L	n/a	n/a	n/a	L
<b>EQIA</b>																								
Short Term	+	n/a	n/a	n/a	+	n/a	n/a	+	n/a	+	+	n/a	n/a	O	n/a		n/a		+	O	n/a		n/a	O
Medium Term	+	n/a	n/a	n/a	+	n/a	n/a	+	n/a	+	+	n/a	n/a	O	n/a		n/a		+	+	n/a		n/a	O
Long Term	+	n/a	n/a	n/a	+	n/a	n/a	+	n/a	+	+	n/a	n/a	O	n/a		n/a		+	+	n/a		n/a	O
Direct / Indirect	I	n/a	n/a	n/a	D	n/a	n/a	I	n/a	D	D	n/a	n/a	D	n/a		n/a		I	I	n/a		n/a	D
Temporary / Permanent	P	n/a	n/a	n/a	P	n/a	n/a	P	n/a	P, T	P	n/a	n/a	P	n/a		n/a		P	P	n/a		n/a	P
Local / Greater London / Wider Region / Global	L/G L/W R	n/a	n/a	n/a	L/G L/W R	n/a	n/a	L/G L/W R	n/a	L, GL, WR	L	n/a	n/a	L, G L	n/a		n/a		L	L	n/a		n/a	L, GL, WR
<b>HIA</b>																								
Short Term	n/a		n/a		?		n/a		n/a	+				O	n/a		n/a	+		O	n/a	n/a		O
Medium Term	n/a		n/a		+		n/a		n/a	+				O	n/a		n/a	+		+	n/a	n/a		O
Long Term	n/a		n/a		+		n/a		n/a	+				O	n/a		n/a	+		+	n/a	n/a		O
Direct / Indirect	n/a		n/a		D		n/a		n/a	D				D	n/a		n/a	I		I	n/a	n/a		D
Temporary / Permanent	n/a		n/a		P		n/a		n/a	P, T				P	n/a		n/a	P		P	n/a	n/a		P
Local / Greater London / Wider Region / Global	n/a		n/a		L/G L		n/a		n/a	L, GL, WR				L, G L	n/a		n/a	L		L	n/a	n/a		L, GL, WR
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
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- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
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- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9 Next steps

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This IIA Report is open for consultation alongside the draft Local Plan. Upon completion of the consultation period, the consultation responses will be collated and analysed. The findings will be used in preparation of, and where appropriate revision of, the final Local Plan.

A Post Adoption Statement is a requirement under the SEA Regulations and is published after the approval of the final Local Plan. This statement outlines how the IIA has influenced the drafting of the Local Plan and will set out how the consultation responses were addressed. The Statement will meet the requirements of the SEA Regulations, but will also reflect the wider scope of the assessment in respect of its coverage of sustainability.

The six-week consultation period on the draft Local Plan for consultation and this IIA Report is due to commence in November. The review of consultation feedback is therefore due to be undertaken in early 2019.

If you would like further information about, or would like to comment on, the London Legacy Development Corporation Local Plan or this Integrated Impact Assessment, please contact:

LLDC Planning Policy  
Level 10  
1 Stratford Place  
E20 1EJ

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## Appendix A

### IIA Context Review

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
<b>International context</b>					
Report of the World Summit on Sustainable Development (2002)	Not applicable	The report presents the outcome of the World Summit on Sustainable Development. This World Summit reaffirmed the international commitment to sustainable development. The aims are to: <ul style="list-style-type: none"> <li>• Accelerate the shift towards sustainable consumption and production with a 10 year framework of programmes of action.</li> <li>• Reverse trend in loss of natural resources.</li> <li>• Urgently and substantially increase the global share of renewable energy</li> <li>• Significantly reduce the rate of loss of biodiversity.</li> </ul>	Natural capital Energy	The plan needs to include objectives that encourage resource efficiency, limit resource loss, increase renewable energy use, improve energy efficiency and protect and enhance biodiversity.	<a href="http://www.unmillenniumproject.org/documents/131302_wssd_report_reissued.pdf">http://www.unmillenniumproject.org/documents/131302_wssd_report_reissued.pdf</a>
Renewed EU Sustainable Development Strategy (2006)	Not applicable	This strategy sets out how the EU will meet its long-standing commitment to meet the challenges of sustainable development. The strategy sets objectives and actions for seven key priority challenges: Climate change and clean energy; sustainable transport; sustainable consumption and production; conservation and management of natural resources; public health; social inclusion, demography and migration; and global poverty and sustainable development challenges.	Climate change adaptation and mitigation Energy Transport Health and health inequalities Resource management Social policy Economy and employment	The Local Plan needs to consider the key objectives, actions and priorities of the Strategy and consider how sustainable development can be incorporated into its strategy.	<a href="http://register.consilium.europa.eu/doc/srv?l=EN&amp;f=ST%2010117%202006%20INIT">http://register.consilium.europa.eu/doc/srv?l=EN&amp;f=ST%2010117%202006%20INIT</a>
EU Seventh Environmental Action Plan 2013-2020	Not applicable	The EAP reviews the significant environmental challenges and provides a framework for European environmental policy up to 2020. The programme lists nine priority objectives and what the EU needs to do to achieve them by 2020: <ol style="list-style-type: none"> <li>1. To protect, conserve and enhance the Union's natural capital</li> <li>2. To turn the Union's citizens from environment-related pressures and risks to health and wellbeing</li> <li>3. To safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing</li> <li>4. To maximise the benefits of the Union's environment legislation by improving implementation</li> <li>5. To increase knowledge about the environment and widen the evidence base for policy</li> <li>6. To secure investment for environment and climate policy and account for the environmental costs of any societal activities</li> <li>7. To better integrate environmental concerns into other policy areas and ensure coherence when creating new policy</li> <li>8. To make the Union's cities more sustainable</li> </ol>	Climate change adaptation and mitigation Energy Transport Health and health inequalities Resource management Social policy Economy and employment	The Local Plan should consider the broad goals the EU sets out in the EAP, concerning climate change, resource management, sustainable development and human health and wellbeing.	<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM:l28027&amp;from=EN">http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM:l28027&amp;from=EN</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
		9. To help the Union address international environmental and climate challenges more effectively.			
European Spatial Development Perspective (ESDP) (1999)	Not applicable	The European Spatial Development Perspective is based on the EU aim of achieving sustainable development, strengthening environmentally sound economic development and social cohesion. The three fundamental goals include: <ol style="list-style-type: none"> <li>1. Economic and social cohesion</li> <li>2. Conservation and management of natural resources and cultural heritage</li> <li>3. More balanced competitiveness of the European territory.</li> </ol>	Resource management Culture Natural capital Economic competitiveness and employment Social policy	The Local Plan should recognise the need for a balance between economic, social and environmental issues and include policies that promote sustainable development.	<a href="http://ec.europa.eu/regional_policy/sources/docoffic/official/reports/pdf/sum_en.pdf">http://ec.europa.eu/regional_policy/sources/docoffic/official/reports/pdf/sum_en.pdf</a>
The Aarhus Convention (1997)	Not applicable	In order to contribute to the protection of the right of every person of present and future generations to live in an environment adequate to his or her health and well-being, each Party subject to the convention shall guarantee the rights of access to information, public participation in decision-making, and access to justice in environmental matters in accordance with the provisions of this Convention.	Public consultation	The Local Plan should be based on a transparent process; consultation on the contents of the IIA and the Local Plan should be ensured.	<a href="https://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf">https://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf</a>
UN Framework Convention on Climate Change (1992)	Not applicable	The convention sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change. It acknowledges that the climatic system is affected by many factors and is a shared system. Under the Convention governments have to: <ul style="list-style-type: none"> <li>• Gather and share information on greenhouse gas emission</li> <li>• Launch national strategies for climate change</li> <li>• Co-operate in adapting to the impacts of climate change</li> </ul>	Climate change mitigation and adaptation Flood risk	The Local Plan should recognise that local action needs to be taken with regards to climate change and that national targets that relate to climate change, flooding and greenhouse gas emissions should be included.	<a href="https://unfccc.int/resource/docs/convkp/conveng.pdf">https://unfccc.int/resource/docs/convkp/conveng.pdf</a>
Paris Agreement (2015)	Not applicable	The Paris Agreement brings together all nations in a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. The Agreement's central aim is to strengthen the global response to the threat of climate change by keeping global temperature rise this century well below 2 degrees Celsius.	Climate change adaptation and mitigation Flood risk Energy consumption and efficiency Resource management	The Local Plan policies should consider the broad goals set out in the Paris Agreement with regards to climate change issues and consider the specific climate targets.	<a href="http://unfccc.int/paris_agreement/items/9485.php">http://unfccc.int/paris_agreement/items/9485.php</a>
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)	Not applicable	The Kyoto protocol reinforces the UN Framework Convention on Climate Change, addressing the problems on anthropogenic climate change by requiring developed countries to set legally binding emission reduction targets for greenhouse gasses. Industrial nations agreed to reduce their collective emissions of greenhouse gasses by 5.2% from 1990 levels.	Climate change adaptation and mitigation Flood risk Energy consumption and efficiency	The Local Plan policies should consider the broad goals set out in the Kyoto Protocol with regards to climate change issues, and consider the specific climate targets.	<a href="http://unfccc.int/kyoto_protocol/items/2830.php">http://unfccc.int/kyoto_protocol/items/2830.php</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
			Resource management		
Second European Climate Change Programme (ECCP II) (2005)	Not applicable	This programme drives climate change mitigation across Europe, with the aim of limiting climate change and meeting Kyoto targets. It also seeks to promote adaptation to the effects of climate change. Most initiatives in the programme are EU-wide and relate to emissions trading, technological specifications, carbon capture and storage.	Climate change adaptation and mitigation Flood risk Energy consumption and efficiency Resource management	The Local Plan should take into account the need to understand and adapt to potential impacts of climate change, particularly extreme weather.	<a href="https://ec.europa.eu/clima/policies/eccp/second_en">https://ec.europa.eu/clima/policies/eccp/second_en</a>
EU Directive on ambient air quality and cleaner air for Europe (2008)	Not applicable	This policy sets binding standards and target dates for reducing concentrations to SO <sub>2</sub> , NO <sub>2</sub> /NO <sub>x</sub> , PM <sub>10</sub> /PM <sub>2.5</sub> , CO, benzene and lead. The directive seeks to maintain ambient air quality in areas where it is good, and improve it in other areas.	Air quality Climate change adaptation and mitigation	This Local Plan should outline measures to be taken to improve local air quality	<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32008L0050">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32008L0050</a>
The Water Framework Directive (2000)	Not applicable	The Water Framework Directive establishes a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which: <ol style="list-style-type: none"> <li>1. Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems</li> <li>2. Promotes sustainable water use based on a long-term protection of available water resources</li> <li>3. Aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances</li> <li>4. Ensures the progressive reduction of pollution of groundwater and prevents its further pollution</li> <li>5. Contributes to mitigating the effects of floods and droughts.</li> </ol>	Water management Flood risk Climate change adaptation and mitigation Biodiversity Resource management	The Local Plan should consider how the water environment can be protected and enhanced, and promote the sustainable use of water resources.	<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060</a>
Drinking Water Directive (1998)	Not applicable	The Drinking Water Directive aims to protect human health from adverse effects of any contamination of water intended for human consumption by ensuring that it is clean.	Water management Health and health inequalities	The Local Plan should consider the impact developments can have on drinking water quality and implement appropriate controls to prevent negative impacts on water quality.	<a href="http://ec.europa.eu/environment/water/water-drink/legislation_en.html">http://ec.europa.eu/environment/water/water-drink/legislation_en.html</a>
Groundwater Directive (2006)	Not applicable	The Groundwater Directive establishes a framework for the protection of groundwater to avoid the deterioration of water quality. The Directive includes groundwater quality standards and threshold values for groundwater pollutants.	Water management Health and health inequalities	The Local Plan should consider the effects developments can have on groundwater quality and implement appropriate controls to prevent negative impacts on water quality.	<a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
					<a href="#">L:2006:372:0019:0031:EN:PDF</a>
The blueprint to safeguard Europe's water resources (2012)	Not applicable	The blueprint to safeguard Europe's water resources emphasises key themes which include improving land use, addressing water pollution, increasing water efficiency and resilience, and improving governance. This blueprint reinforces the objectives set out in the Water Framework Directive.	Water management Flood risk Resource management	The Local Plan should consider how the water environment can be protected and enhanced, and promote the sustainable use of water resources.	<a href="http://ec.europa.eu/environment/water/blueprint/index_en.html">http://ec.europa.eu/environment/water/blueprint/index_en.html</a>
Directive on the assessment and management of flood risks (2007)	Not applicable	This Directive aims to reduce and manage the risks that flooding poses for human health, the environment, cultural heritage and economic activity. It requires Member States to assess whether all water courses are at risk from flooding, to map the flood extent and assets/humans at risk in these areas, and to take adequate and coordinated measures to reduce flood risk. The Directive is to be carried out in co-ordination with the Water Framework Directive.	Flood risk Resource management Water management	The Local Plan must consider potential flood risk in the local area and how this could impact humans and assets within at-risk areas. This Plan should aim to prevent development within floodplains.	<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32007L0060">http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32007L0060</a>
UN Convention on Biological Diversity (1993)	Not applicable	The convention on Biological Diversity has 3 main objectives: 1. The conservation of biological diversity 2. The sustainable use of the components of biological diversity 3. The fair and equitable sharing of the benefits arising out of the utilisation of genetic resources. It aims to halt the worldwide loss of animal and plant species, and save and enhance biodiversity.	Natural capital Resource management	The Local Plan should consider biodiversity protection within it's policies.	<a href="https://www.cbd.int/intro/default.shtml">https://www.cbd.int/intro/default.shtml</a>
Bern Convention on the conservation of migratory species of wild animals (1979)	Not applicable	The principle objectives of the Convention are to conserve wild flora and fauna and their natural habitats. Particular emphasis is given to endangered and vulnerable species, including migratory species. The convention aims to protect over 500 wild plant species and more than 1000 wild animal species. Each Contracting Party is obliged to: <ul style="list-style-type: none"> <li>Promote national policies for the conservation of wild flora, wild fauna and natural habitats, with particular attention to endangered and vulnerable species, especially endemic ones, and endangered habitats, in accordance with the provisions of this Convention</li> <li>Have regard to the conservation of wild flora and fauna in its planning and development policies and in its measures against pollution</li> <li>Promote education and disseminate general information on the need to conserve species of wild flora and fauna and their habitats.</li> </ul>	Natural capital	The Local Plan should consider protected habitats and species and should include provisions for the preservation, protection and improvement of the environment.	<a href="http://jncc.defra.gov.uk/page-1364">http://jncc.defra.gov.uk/page-1364</a>
Bonn Convention on the	Not applicable	The Convention is an intergovernmental treaty under the United Nations Environment Programme. The aim is for contracting parties to work together to conserve terrestrial,	Natural capital Energy	The Local Plan should consider protected habitats and species and should include provisions for the	

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Conservation of Migratory Species of Wild Animals (1979)		marine and avian migratory species and their habitats (on a global scale) by providing strict protection for endangered migratory species. The overarching objectives are: <ul style="list-style-type: none"> <li>Promote, co-operate in and support research relating to migratory species</li> <li>Endeavour to provide immediate protection for migratory species included in Appendix I</li> <li>Endeavour to conclude Agreements covering the conservation and management of migratory species included in Appendix II.</li> </ul>		preservation, protection and improvement of the environment.	
EU Birds Directive (2009)	Not applicable	The Directive places great emphasis on the protection of habitats for endangered as well as migratory species (listed in Annex I), especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species.	Natural capital	This Local Plan should take into consideration the need to preserve and enhance natural resources that includes the protection of birds.	<a href="http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm">http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm</a>
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (1992)	Not applicable	This directive aims to conserve natural habitats, wild fauna and flora. Member states must take measures to maintain or restore favourable conservation status of natural habitats and species of importance. This includes sites such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites. Plans that might impact the integrity of a designated site would be subject to an Appropriate Assessment.	Natural capital	The Local Plan needs to consider habitats and species that are identified under the Directive and should include provisions to ensure the protection, preservation and enhancement of the environment.	<a href="http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm">http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm</a>
Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)	Not applicable	The mission of this international treaty is 'the conservation and wise use of all wetlands through local, regional and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world'. There are 1556 wetland sites designated for inclusion in the Ramsar Loss of Wetlands of International Importance, totalling 129.6 hectares. The objectives 2003-2008 objectives including insuring the wise use of wetlands; achieving appropriate management of wetlands of international importance; promoting the international co-operation; ensuring that required implementation mechanisms, resources and capacity are in place; and progressing towards the accession of all the countries to the Convention.	Natural capital	The Local Plan needs to consider wetlands and include provisions to ensure the protection, preservation and enhancement of the environment as appropriate.	<a href="http://www.ramsar.org/sites/default/files/documents/library/scan_certified_e.pdf">http://www.ramsar.org/sites/default/files/documents/library/scan_certified_e.pdf</a>
The EU Biodiversity Strategy to 2020 (2011)	Biodiversity Baseline prepared in 2010 by the European Environment Agency (EEA) in collaboration with the European Commission.	New strategy over the next decade to halt the loss of biodiversity and improve the state of Europe's species, habitats, ecosystems and the services they provide. This new strategy is aligned with EU's contribution to averting global biodiversity loss. The six targets of the strategy are: <ol style="list-style-type: none"> <li>Fully implement the Birds and Habitats Directives</li> <li>Maintain and restore ecosystems and their services</li> </ol>	Natural capital	The Local Plan needs to consider habitats and species and include provisions to ensure the protection, preservation and enhancement of the environment.	<a href="http://ec.europa.eu/environment/nature/info/pubs/docs/brochures/2020%20Biod%20brochure%20final%20lowres.pdf">http://ec.europa.eu/environment/nature/info/pubs/docs/brochures/2020%20Biod%20brochure%20final%20lowres.pdf</a>

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		3. Increase the contribution of agriculture and forestry to biodiversity 4. Ensure the sustainable use of fisheries resources 5. Combat Invasive Alien Species 6. Set-up action to tackle the global biodiversity crisis For each target a list of actions is presented.			
European Landscape Convention (2000)	Not applicable	This convention noted that the landscape is favourable to economic activity and has an important public interest role in the cultural, ecological, environmental and social fields. The objectives are to promote European landscape protection, management and planning, and to organise European co-operation on landscape issues.	Natural capital Historic environment Design	The Local Plan needs to consider the protection, preservation and enhancement of the landscape as appropriate.	<a href="https://rm.coe.int/1680080621">https://rm.coe.int/1680080621</a>
Basic Texts of the 1972 World Heritage Convention (2005)	Not applicable	The Convention requires that cultural and natural heritage is identified, protected and conserved, which requires measures to be taken.	Historic environment	The Local Plan needs to consider the protection, preservation and enhancement of the cultural and natural heritage as appropriate.	<a href="http://whc.unesco.org/uploads/activities/documents/activity-562-4.pdf">http://whc.unesco.org/uploads/activities/documents/activity-562-4.pdf</a>
Waste Framework Directive (2008/98/EC)	Not applicable	The Directive establishes the legislative framework for the handling of waste in the community. The objectives are to provide a comprehensive and consolidated approach to the definition and management of waste; to shift the thinking of waste from an unwanted burden to a valued resource and make Europe a recycling society; to ensure waste management starts with waste prevention; and to provide environmental criteria for certain waste streams, to establish when a waste ceases to be a waste.	Energy consumption and efficiency Materials and waste	The Local Plan needs to support the re-use of waste and initiatives towards valuing waste as a resource.	<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098&amp;from=EN">http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0098&amp;from=EN</a>
Energy efficiency directive (2012)	Not applicable	The Directive promotes energy efficiency to ensure the achievement of the European Union's 2020 20% target on energy efficiency. All Member States are required to use energy more efficiently at all stages of the energy chain, including the transformation of energy, distribution and final consumption.	Energy consumption and efficiency Resource management	The Local Plan should seek to achieve energy savings in line with the Directive, in household, industry and transport sectors.	<a href="http://ec.europa.eu/energy/en/topics/energy-efficiency/energy-efficiency-directive">http://ec.europa.eu/energy/en/topics/energy-efficiency/energy-efficiency-directive</a>
<b>National context</b>					
UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)	Not applicable	The strategy for sustainable development aims to enable all people to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. The following issues have been highlighted as the main priority areas for immediate action: <ul style="list-style-type: none"> <li>• Sustainable consumption and production - working towards achieving more with less</li> <li>• Natural resource protection and environmental enhancement</li> <li>• Protecting the natural resources on which we depend</li> <li>• From local to global - building sustainable communities creating places where people want to live and work, now and in the future</li> </ul>	Air quality Resource management Water quality Natural capital Climate change adaptation and mitigation Energy consumption and efficiency	The Local Plan needs to include the key objectives of the strategy and contribute to the development of more sustainable communities.	<a href="https://www.gov.uk/government/publications/securing-the-future-delivering-uk-sustainable-development-strategy">https://www.gov.uk/government/publications/securing-the-future-delivering-uk-sustainable-development-strategy</a>

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		<ul style="list-style-type: none"> <li>Climate change and energy - confronting the greatest threat</li> </ul> <p>The following principles will be used to achieve sustainable development:</p> <ul style="list-style-type: none"> <li>Living within environmental limits</li> <li>Ensuring a strong, healthy and just society</li> <li>Promoting good governance</li> <li>Using sound science robustly</li> </ul> <p>The Government has devised 68 high level strategy indicators to measure success, such as greenhouse gas emissions, CO<sub>2</sub> emissions by end user, renewable electricity, bird populations, air quality and river quality.</p>			
Planning Act (2008)	Not applicable	The 2008 Act provides the consenting regime for granting planning and other consents for nationally significant infrastructure projects. The Act establishes thresholds above which certain types of infrastructure development are considered to be nationally significant and in relation to which developers must seek development consent.	Infrastructure Design Sustainable land use	The preparation of the plan should consider the recommended actions in this document.	<a href="https://www.gov.uk/government/publications/planning-act-2008-associated-development-applications-for-major-infrastructure-projects">https://www.gov.uk/government/publications/planning-act-2008-associated-development-applications-for-major-infrastructure-projects</a>
Environmental Quality in Spatial Planning, including Supplementary Files (2005)	Not applicable	This document, jointly published by The Countryside Agency, English Heritage, English Nature and the EA, sets out guidance to help prepare regional spatial strategies and local development framework, ensuring the incorporation of the natural, historic and built environment.	Historic environment Natural capital Infrastructure Resource management	The Local Plan should take into consideration the recommended guidance outlined in this document.	<a href="http://www.nebiodiversity.org.uk/docs/50.pdf">http://www.nebiodiversity.org.uk/docs/50.pdf</a>
World Class Places: The Government's Strategy for Improving Quality of Place (2009)	Not applicable	The document describes the Government's strategy for improving the quality of the built environment, recognising the economic, social and environmental benefits that this can bring. There are seven objectives to the strategy: <ol style="list-style-type: none"> <li>Strengthen leadership on quality of place at the national and regional level</li> <li>Encourage local civic leaders and local government to prioritise quality of place</li> <li>Ensure relevant government policy, guidance and standards consistently promote quality of place and are user-friendly</li> <li>Put the public and community at the centre of place-shaping</li> <li>Ensure all development for which central government is directly responsible is built to high design and sustainability standards and promotes quality of place</li> </ol>	Equality and inclusion Social integration Design Infrastructure Accessibility Culture Natural environment Historic environment	The Local Plan needs to favour community development while protecting and enhancing the built environment.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-examination-documents/national-strategy-papers/ns2-world-class-places.ashx?la=en">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-examination-documents/national-strategy-papers/ns2-world-class-places.ashx?la=en</a>

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		<p>6. Encourage higher standards of market-led development</p> <p>7. Strengthen quality of place skills, knowledge and capacity.</p>			
Green Infrastructure and the Urban Fringe: Learning lessons from the Countryside In and Around Towns programme (2007)	Not applicable	<p>The programme emerged as a response to the Government's drive for sustainable development which requires a multi-disciplinary approach. The Countryside In and Around Towns (CIAT) programme was developed to unlock and make the best use of resources and opportunities, and therefore contribute towards sustainable development.</p> <p>The urban fringe is the extensive area around towns and cities which accounts for more than 20% of the land in England.</p>	<p>Sustainable land use</p> <p>Design</p> <p>Natural environment</p> <p>Historic environment</p> <p>Material and waste</p>	The Local Plan should consider the lessons learnt from the CIAT programme and works towards developing sustainable communities.	<a href="http://publications.naturalengland.org.uk/publication/36009">http://publications.naturalengland.org.uk/publication/36009</a>
The Code for Sustainable Homes: Setting the Standard in Sustainability for New Homes (2008)	Not applicable	<p>The Code is a voluntary standard designed to improve the overall sustainability of new homes. This can be achieved by setting a single framework within which the home building industry can design and construct homes to higher environmental standards and offer a tool for developers to differentiate themselves within the market. The document sets out the assessment process and the performance standards. Sustainability at home is measured against nine design categories, including energy and CO<sub>2</sub> emissions; water; materials; surface water run-off; waste; pollution; health and wellbeing; management; and ecology.</p>	<p>Health and health inequalities</p> <p>House supply, quality, choice and affordability</p> <p>Design</p> <p>Air quality</p> <p>Energy use and supply</p> <p>Water resources and quality</p> <p>Natural environment (including biodiversity)</p> <p>Materials and waste</p>	The Local Plan needs to support the provision of sustainable new homes by using the performance standards as guidance.	<a href="http://webarchive.nationalarchives.gov.uk/20120919233342/http://www.communities.gov.uk/documents/planningandbuilding/pdf/code_sustainhomesstandard.pdf">http://webarchive.nationalarchives.gov.uk/20120919233342/http://www.communities.gov.uk/documents/planningandbuilding/pdf/code_sustainhomesstandard.pdf</a>
Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM) (2005)	Not applicable	<p>The strategy aims to reduce the number of households living in insecure temporary accommodation. The objectives of the strategy are to:</p> <ul style="list-style-type: none"> <li>• Prevent homelessness;</li> <li>• Provide support for vulnerable people;</li> <li>• Tackle the wider causes and symptoms of homelessness;</li> <li>• Help more people move away from rough sleeping; and</li> <li>• Provide more settled homes.</li> </ul>	<p>Health and health inequalities</p> <p>House supply, quality, choice and affordability</p>	The Local Plan needs to support the provision of affordable homes.	<a href="http://webarchive.nationalarchives.gov.uk/20120920035922/http://www.communities.gov.uk/documents/housing/pdf/137815.pdf">http://webarchive.nationalarchives.gov.uk/20120920035922/http://www.communities.gov.uk/documents/housing/pdf/137815.pdf</a>
Climate Change Act (2008)	Not applicable	<p>The Act commits the UK to mitigate the impacts of climate change. The key objectives are the improve carbon management by moving towards a low-carbon economy and to demonstrate internationally UK's leadership in reducing global emissions.</p>	<p>Climate change adaptation and mitigation</p> <p>Air quality</p> <p>Energy use and</p>	The Local Plan needs to support actions and development aiming to combat climate change.	<a href="http://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_e">http://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_e</a>

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			supply Materials and waste		
Stern Review of the Economics of Climate Change (2006)	Levels of stock of greenhouse gases (GHG) in the atmosphere. GHG in 2000, by source. Illustrative emissions paths to stabilise at 550ppm CO <sub>2</sub> .	The review is a contribution to assessing the evidence and building understanding of the economics of climate change. The two parts of the review are: <ol style="list-style-type: none"> <li>1. To examine the evidence on the economic impacts of climate change itself and explore the economics of stabilising greenhouse gases in the atmosphere.</li> <li>2. To consider the complex policy challenges involved in managing the transition to a low-carbon economy and to ensure that societies can adapt to the consequences of climate change that can no longer be avoided.</li> </ol>	Climate change adaptation and mitigation Air quality Energy use and supply Materials and waste	The Local Plan needs to support actions and development aiming to combat climate change.	<a href="http://www.wwf.se/source.php/1169157/Stern%20Report_Exec%20Summary.pdf">http://www.wwf.se/source.php/1169157/Stern%20Report_Exec%20Summary.pdf</a>
UK carbon plan (2011)	National progress over the last decades towards a low carbon economy	The Carbon Plan sets out the Government's plans for achieving the emissions reductions set out in the first four carbon budgets, on a pathway consistent with meeting the UK's 2050 target. The publication brings together the Government's strategy to curb greenhouse gas emissions and deliver climate change targets. The plan outlines a commitment to reduce carbon emissions by at least 80% by 2050.	Climate change adaptation and mitigation Air quality Energy use and supply Materials and waste	The Local Plan should include the need to reduce carbon emissions to meet UK national targets.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47613/3702-the-carbon-plan-delivering-our-low-carbon-future.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47613/3702-the-carbon-plan-delivering-our-low-carbon-future.pdf</a>
Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System (2009)	Not applicable	This report examines ways in which the land use planning system can help biodiversity adapt to climate change. It recommends strategies that meet the core adaptation goals set out by Defra: Conserve existing biodiversity <ul style="list-style-type: none"> <li>• Conserve protected areas and other high quality habitats</li> <li>• Conserve range and ecological variability of habitats and species</li> <li>• Reduce sources of harm not linked to climate</li> <li>• Develop ecologically resilient and varied landscapes</li> <li>• Conserve and enhance local variation within sites and habitats</li> <li>• Make space for the natural development of rivers and coasts</li> <li>• Establish ecological networks through habitat protection, restoration and creation</li> <li>• Make sound decisions based on analysis</li> <li>• Thoroughly analyse causes of change</li> <li>• Respond to changing conservation priorities</li> <li>• Integrate adaptation and mitigation measures into conservation management, planning and practice.</li> </ul>	Natural capital Design Climate change adaptation and mitigation	The Local Plan should consider recommendations from this report to ensure biodiversity assets are protected from inappropriate developments through techniques such as buffer zones around sensitive sites.	<a href="http://publications.naturalengland.org.uk/publication/41006">http://publications.naturalengland.org.uk/publication/41006</a>

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Planning for climate change - guidance for local authorities (2012)	Not applicable	This document, produced by the planning and climate change coalition, aims to support local authorities who want to reduce climate change impacts and maximise the economic benefits that solutions, such as renewable energy or sustainable transport, can bring.	Climate change adaptation and mitigation Natural capital and natural environment Energy	This publication is directly aimed at local authorities and the Local Plan can consider it in order to address climate change issues.	<a href="http://www.rtpi.org.uk/media/505555/planning_for_climate_change_guidance_for_local_authorities_rtpi_endorsed_1_2012.pdf">http://www.rtpi.org.uk/media/505555/planning_for_climate_change_guidance_for_local_authorities_rtpi_endorsed_1_2012.pdf</a>
Energy Act (2013)	Not applicable	This Act sets out legislation to: <ul style="list-style-type: none"> <li>• Reflect the availability of new technologies</li> <li>• Correspond with our changing requirements for security of supply infrastructure</li> <li>• Ensure adequate protection for the environment and the tax payer as our energy market changes</li> </ul>	Climate change adaptation and mitigation Resource management Energy consumption and efficiency	The Local Plan should ensure that policies are in place to encourage the reduction of CO <sub>2</sub> emissions and promote sustainable economic growth.	<a href="https://www.gov.uk/government/collections/energy-act">https://www.gov.uk/government/collections/energy-act</a>
Low carbon transport: a greener future - a carbon reduction strategy for transport (2009)	This document identifies the current state of the national transport system and future expectations, such as passenger number increases.	This strategy identifies how the transport sector will meet its emissions reduction and contribute to the Government's overall policy on climate change, as set out in the Climate Change Act 2008.	Transport Climate change mitigation and resilience Resource management	The Local Plan should consider the promotion for low-carbon transport and the use of new and emerging technology, in addition to promoting a modal shift to sustainable transport choices.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228897/7682.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228897/7682.pdf</a>
Wildlife and Countryside Act (1981) (as amended)	Not applicable	This act forms the basis of conservation legislation in Great Britain. The act consolidates the requirements of European Directives including the Bern Convention and Birds Directive. Schedules 5 and 8 detail lists of legally protected wild animals and plants respectively, updated every 5 years.	Natural capital and natural environment	The Local Plan must ensure that species and habitats are protected to comply with the Act.	<a href="http://www.legislation.gov.uk/ukpga/1981/69">http://www.legislation.gov.uk/ukpga/1981/69</a>
The Conservation of Habitats and Species Regulations (2010)	Not applicable	These regulations implement the requirements of the Habitats Directive. The regulations outline a list of sites which are important for either habitats of species (listed in Annexes I and II of the Habitats Directive respectively). These sites must then be designed as Special Areas of Conservation (SACs).	Natural capital and natural environment	The Local Plan must ensure that species and habitats are protected to comply with the Act.	<a href="http://www.legislation.gov.uk/uksi/2010/490/contents/made">http://www.legislation.gov.uk/uksi/2010/490/contents/made</a>
The Countryside and Rights of Way (CRoW) Act (2000)	Not applicable	This Act creates a new statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen the nature conservation legislation and to facilitate better management of Areas of Outstanding Natural Beauty (AONBs).	Natural capital and natural environment	The Local Plan should ensure that developments consider biodiversity protection.	<a href="http://www.legislation.gov.uk/ukpga/2000/37/contents">http://www.legislation.gov.uk/ukpga/2000/37/contents</a>
Natural Environment and Rural Communities Act (2006)	Not applicable	This Act created Natural England and the Commission for Rural Communities. This Act extends the biodiversity duty set out in the CRoW Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. This duty states that every public authority must have regard to the purpose of conserving biodiversity.	Natural capital and natural environment	The Local Plan should ensure that developments consider biodiversity protection.	<a href="http://www.legislation.gov.uk/ukpga/2006/16/contents">http://www.legislation.gov.uk/ukpga/2006/16/contents</a>

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UK Post-2010 Biodiversity Framework (2012)	Not applicable	This framework covers the period 2011-2020. It outlines how the UK can achieve the Aichi Biodiversity Targets and aims of the EU biodiversity strategy. It takes a holistic landscape-scale approach to managing the environment than the previous BAP plan launched in 1994, but includes many of the same principles. The plan contains 1150 species and 65 habitats listed as priorities.	Natural capital and natural environment	The Local Plan must ensure that species and habitats are protected to comply with the framework.	<a href="http://jncc.defra.gov.uk/pdf/UK_Post2010_Bio-Fwork.pdf">http://jncc.defra.gov.uk/pdf/UK_Post2010_Bio-Fwork.pdf</a>
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)	Not applicable	This strategy documents the biodiversity strategy for England, providing a comprehensive picture of how the country is implementing international and EU commitments. It specifically sets out the strategic direction for biodiversity policy over the next few years on land and sea.	Natural capital and natural environment	The Local Plan should ensure that developments consider biodiversity protection and ensure there is no biodiversity loss.	<a href="https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services">https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services</a>
Biodiversity by Design: A Guide for Sustainable Communities (2004)	Not applicable	This document provides guidance on how to maximise the opportunities for biodiversity in the planning and design of sustainable communities. The guidance is designed to apply at a variety of scales from sub-region growth points, to neighbourhood schemes.	Natural capital and natural environment Design	The Local Plan should ensure that developments consider how biodiversity can be protected and enhanced alongside new developments.	<a href="http://tcpa.brix.fatbeehive.com/data/files/bd_biodiversity.pdf">http://tcpa.brix.fatbeehive.com/data/files/bd_biodiversity.pdf</a>
UK Biodiversity Indicators 2015, (2016)	Not applicable	This document outlines the set of indicators used by the UK to report on the progress towards meeting the Convention on Biological Diversity (the 'Aichi targets') and the Strategic Plan for Biodiversity.	Natural capital and natural environment	The Local Plan should ensure that developments consider biodiversity protection and could use these indicators for future monitoring purposes.	<a href="http://jncc.defra.gov.uk/pdf/UKBI_2015_v3a.pdf">http://jncc.defra.gov.uk/pdf/UKBI_2015_v3a.pdf</a>
Natural Environment White Paper: implementation updates	Not applicable	The Natural Environment White Paper has a focus on promoting high quality natural environments, expanding multi-functional green infrastructure networks and initiating landscape-scale action to support ecological networks. The Paper specifically seeks to: <ul style="list-style-type: none"> <li>• Protect core areas of high nature conservation value; and</li> <li>• Promote corridors and stepping stones to enable species to move between key areas.</li> </ul>	Natural capital and natural environment	The Local Plan should ensure that developments consider biodiversity protection.	<a href="https://www.gov.uk/government/publications/natural-environment-white-paper-implementation-updates">https://www.gov.uk/government/publications/natural-environment-white-paper-implementation-updates</a>
Making Space for Nature: A review of England's Wildlife Sites and Ecological Network (2010)	Not applicable	This review looks at England's wildlife sites and whether they are capable of responding and adapting to the growing challenges of climate change. It highlighted that England's wildlife sites are fragmented and vulnerable to change. The report made a number of key points for strengthening the natural environment: <ul style="list-style-type: none"> <li>• That we better protect and manage our designated wildlife sites;</li> <li>• That we establish new Ecological Restoration Zones; and</li> </ul>	Natural capital and natural environment	The Local Plan should ensure that developments consider biodiversity protection and seek to enhance wildlife resources.	<a href="http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf">http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf</a>

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		<ul style="list-style-type: none"> <li>That we better protect our non-designated wildlife sites.</li> </ul>			
Geological Conservation Review Series (Ongoing)	Not applicable	The Geological Conservation Review (GCR) is designed to identify sites of national and international importance needed to show all the key identified elements of the Earth heritage of Britain. The review outlines sediments, rocks, fossils and features of the landscape that make a special contribution to understanding the earth-science and geological history of Britain.	Geology and soils	The Local Plan should include measures to ensure that valuable soil resources are protected and enhanced.	<a href="http://www.thegcr.org.uk/">http://www.thegcr.org.uk/</a>
Safeguarding our Soils: A Strategy for England (2009)	Not applicable	This strategy outlines a vision for all soils in England to be managed sustainably and the threat of degradation managed by 2030. Overall, this would improve the quality of England's soils and safeguard their ability to provide essential services for future use.	Geology and soils	The Local Plan should include measures to ensure that valuable soil resources are protected and enhanced.	<a href="https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england">https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england</a>
Green Infrastructure Guidance (2011)	Not applicable	This guidance outlines the essential part green infrastructure plays in sustainable spatial planning. It considers green infrastructure as a 'life support system', able to deliver multiple environmental functions and play a key part in adapting and mitigating climate change. The guidance provides advice to local authorities on how to deliver green infrastructure improvements throughout the planning system.	Natural capital and natural environment	The Local Plan should seek to protect existing green infrastructure and promote new, multi-functional green spaces.	<a href="http://publications.naturalengland.org.uk/publication/35033">http://publications.naturalengland.org.uk/publication/35033</a>
Providing Accessible Natural Greenspace in Towns and Cities	Not applicable	<p>These publications by Natural England explain and give guidance on the concept of Accessible Natural Green Space Standards (ANGSt). The 2010 report provides practical advice to planning authorities on meeting the standards within new and existing developments.</p> <p>The document recommends that everyone, wherever they live, should have an accessible natural greenspace:</p> <ul style="list-style-type: none"> <li>of at least 2ha in size, no more than 300m (5min walk) from home;</li> <li>at least one accessible 20ha site within 2km of home;</li> <li>one accessible 100ha site within 5km of home; and</li> <li>one accessible 500ha site within 10km of home.</li> </ul>	Natural capital and natural environment	This Local Plan should aim to protect, enhance and increase the provision of natural spaces for local residents.	<a href="http://publications.naturalengland.org.uk/publication/65021">http://publications.naturalengland.org.uk/publication/65021</a>
Planning (Listed Buildings and Conservation Areas) Act (1990)	Not applicable	The Planning (Listed Buildings and Conservation Areas) Act 1990 is an Act of Parliament on granting planning permission for building works, notably including those of the listed building system in England and Wales.	Historic environment	The Local Plan must ensure the requirements of the Act are complied with and that Listed Buildings and Conservation Areas are protected.	<a href="http://www.legislation.gov.uk/ukpga/1990/9/contents">http://www.legislation.gov.uk/ukpga/1990/9/contents</a>
The Air Quality Strategy for England, Scotland, Wales and	The Strategy outlines past UK-wide emissions for key pollutants and predicted future baseline.	This strategy sets out air quality objectives and policy options to further improve air quality in the UK, delivering environmental, health and social benefits. The strategy sets objectives and targets for each air quality pollutant.	Air quality Climate change adaptation and mitigation	The Local Plan should consider the current local air quality conditions and what measures can be taken to improve it, and protect those areas of good air quality.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69337/pb12670-air-">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69337/pb12670-air-</a>

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Northern Ireland (2007)					<a href="#">quality-strategy-vol2-070712.pdf</a>
Future Water: The Government's Water Strategy for England (2008)	Not applicable	The vision for water policy and management by 2030 includes: <ul style="list-style-type: none"> <li>• Improving the water quality and the ecology it supports, and continuing to provide high levels of drinking water quality;</li> <li>• Managing flood risks and coastal erosion in a sustainable way;</li> <li>• Ensuring a sustainable use of water resources and implementing fair, affordable and cost-reflective water charges;</li> <li>• Cutting greenhouse gas emissions; and</li> <li>• Embedding continuous adaptation to climate change and other pressures.</li> </ul>	Climate change adaptation and mitigation Water resources and quality Flood risk Natural capital and natural environment Air quality	The Local Plan should consider the current water quality and measures to improve water quality and management.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf</a>
Flood and Water Management Act (2010)	Not applicable	The Act provides more comprehensive management of coastal erosion and flood risk. It also contains financial provisions related to the water industry.	Flood risk Water resources and quality	The Local Plan should consider potential flood risk in the local area and how this could impact humans and assets within the at-risk areas.	<a href="http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_2010029_en.pdf">http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_2010029_en.pdf</a>
Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management in England (2005)	Not applicable	The strategy aims to manage risks by employing an integrated portfolio of approaches which reflect both national and local priorities in order to: <ul style="list-style-type: none"> <li>• Reduce the threat to people and their property; and</li> <li>• Deliver the greatest environmental, social and economic benefit, consistent with the Government's sustainable development principles.</li> </ul>	Flood risk Water resources and quality	The Local Plan should consider potential flood risk in the local area and how this could impact human assets within the at-risk areas.	<a href="https://core.ac.uk/download/pdf/84317.pdf">https://core.ac.uk/download/pdf/84317.pdf</a>
Waste Strategy for England (2007)	Not applicable	The key objectives are to: <ul style="list-style-type: none"> <li>• Put emphasis on waste prevention and re-use and decouple waste growth from economic growth;</li> <li>• Meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020;</li> <li>• Increase diversion from landfill to non-municipal waste and secure better integration of treatment for municipal and non-municipal waste;</li> <li>• Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste; and</li> <li>• Get the most environmental benefit from that investment, through increased recycling of resources</li> </ul>	Energy use and supply Materials and waste	The Local Plan needs to support sustainable waste management.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228536/7086.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228536/7086.pdf</a>

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		and recovery of energy from residual waste using a mix of technologies.			
The Egan Review: Skills for Sustainable Communities (2004)	Not applicable	The review suggests a definition of 'sustainable community' which should become a common goal for everyone. The components of sustainable communities include: <ul style="list-style-type: none"> <li>• Governance: Effective and inclusive participation, representation and leadership;</li> <li>• Transport and connectivity: Good transport services and communication;</li> <li>• Services: A full range of accessible community and voluntary services;</li> <li>• Environmental: Providing environmentally-friendly places for people to live in;</li> <li>• Economy: A flourishing and diverse local economy;</li> <li>• Housing and the built environment: A quality built and natural environment;</li> <li>• Social and cultural: Vibrant and inclusive communities.</li> </ul>	Equality and inclusions Social integration Design Accessibility Connectivity Infrastructure Culture Natural environment Historic environment	The Local Plan should favour community development which includes great connectivity, range of accessible services and vibrant and inclusive communities, while protecting and enhancing the built environment.	<a href="http://ihbc.org.uk/recent_papers/docs/Egan%20Review%20Skills%20for%20sustainable%20Communities.pdf">http://ihbc.org.uk/recent_papers/docs/Egan%20Review%20Skills%20for%20sustainable%20Communities.pdf</a>
Working for a Healthier Tomorrow (2008)	Not applicable	The review sought to establish the foundations for a broad consensus around a new vision for health and work. The three main objectives of this vision are: <ol style="list-style-type: none"> <li>1. Prevention of illness and promotion of health and well-being.</li> <li>2. Early intervention for those who develop a health condition.</li> <li>3. Improvement in the health of those out of work, so that everyone with the potential to work has the support they need to do so.</li> </ol> Chapters in this review present how the health of the working age population can be measured and how to establish a baseline.	Health and health inequalities	The Local Plan should consider issues related to human health.	<a href="https://www.nrib.org.uk/sites/default/files/Working_for_a_healthier_tomorrow.pdf">https://www.nrib.org.uk/sites/default/files/Working_for_a_healthier_tomorrow.pdf</a>
Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002 (2008)	Various information on flooding and climate change in the UK.	The report provides an update of a report published in 2002, addressing the health effects of climate change in the UK. Each chapter of the report summarises the main points and a number of recommendations are made to mitigate the effects of climate change on health.	Health and health inequalities Climate change adaptation and mitigation	The Local Plan should consider the impacts of climate change on human health and suggest measures individuals can take to mitigate the effects of climate change. The Local Plan should also consider measures to combat climate change.	<a href="https://www.climatenorthernireland.org.uk/cmsfiles/resources/files/Health-Effects-of-Climate-Change-in-the-UK-2008_Department-of-Health-Update.pdf">https://www.climatenorthernireland.org.uk/cmsfiles/resources/files/Health-Effects-of-Climate-Change-in-the-UK-2008_Department-of-Health-Update.pdf</a>
National Planning Policy Framework March (2012)	Not applicable	The National Planning Policy Framework (NPPF) sets out the Government's planning policy for England and how they are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development, which includes economic, social	Housing supply, quality, choice and affordability Sustainable land use Design	The Local Plan should consider sustainable development in economic, social and environmental dimensions.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf</a>

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		<p>and environmental dimensions. The aims of achieving sustainable development include:</p> <ul style="list-style-type: none"> <li>• Building a strong, competitive economy;</li> <li>• Ensuring the vitality of town centres;</li> <li>• Supporting a prosperous rural economy;</li> <li>• Promoting sustainable transport</li> <li>• Supporting high quality communications infrastructure;</li> <li>• Delivering a wider choice of high quality homes;</li> <li>• Requiring good design;</li> <li>• Promoting healthy communities;</li> <li>• Protecting Green Belt land;</li> <li>• Meeting the challenge of climate change, flooding and coastal change;</li> <li>• Conserving and enhancing the natural environment;</li> <li>• Conserving and enhancing the historic environment;</li> <li>• Facilitating the sustainable use of minerals.</li> </ul>	<p>Economic competitiveness and employment Infrastructure Natural capital and natural environment Historic environment Materials and waste</p>		
Localism Act (2011)	Not applicable	<p>The Act presents a number of proposals to give local authorities new freedoms and flexibility shifting power from the central state. The principles are:</p> <ul style="list-style-type: none"> <li>• New freedoms and flexibilities for local government;</li> <li>• New rights and powers for local communities;</li> <li>• Reform to make the planning system clearer and more effective;</li> <li>• Reform to ensure that decisions are taken locally.</li> </ul>	<p>Equality and inclusion Social integration</p>	The Local Plan should be aware of the principles of the Act.	<a href="http://www.legislation.gov.uk/ukpga/2011/20/pdfs/ukpga_20110020_en.pdf">http://www.legislation.gov.uk/ukpga/2011/20/pdfs/ukpga_20110020_en.pdf</a>
National Planning Policy for Waste (2014)	Not applicable	<p>The document sets out the Government's ambition to work towards a more sustainable and efficient approach to the use and management of resources. The objectives of this planning policy are to:</p> <ul style="list-style-type: none"> <li>• Deliver sustainable development and resource efficiency;</li> <li>• Ensure waste management is considered alongside other spatial planning concerns;</li> <li>• Provide a framework in which communities and businesses are engaged with and take more responsibility for their own waste;</li> <li>• Help to secure waste re-use, recovery and disposal;</li> <li>• Ensure the design and layout of new residential and commercial developments and other infrastructure complements sustainable waste management.</li> </ul>	<p>Sustainable land use Design Materials and waste</p>	The Local Plan should consider a sustainable approach to the use and management of resources, especially waste.	<a href="http://www.legco.gov.hk/general/english/library/stay_informed_overseas_policy_updates/national_planning_policy_for_waste.pdf">http://www.legco.gov.hk/general/english/library/stay_informed_overseas_policy_updates/national_planning_policy_for_waste.pdf</a>
Planning Policy Guidance Flood Risk and Coastal Change (March 2014)	Not applicable	<p>The documents on flood risk and coastal change include guidance on:</p> <ol style="list-style-type: none"> <li>1. Planning and flood risk.</li> <li>2. Taking flood risk into account in the preparation of Local Plans.</li> <li>3. Strategic Flood Risk Assessment</li> </ol>	Flood Risk	The Local Plan should consider the flood risk and coastal change guidance as it contains guidance specific to the preparation of Local Plans.	<a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a>

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		<ol style="list-style-type: none"> <li>4. The sequential risk-based approach to the location of development.</li> <li>5. The aim of the sequential test.</li> <li>6. Applying the sequential test in preparation of a Local Plan.</li> </ol>			
The London Plan: The Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016)	Not applicable	<p>The London Plan is:</p> <ul style="list-style-type: none"> <li>• Overall strategic plan for London for the development over the next 20-25 years, setting out an integrated framework (economic, environmental, transport and social);</li> <li>• Document that brings together the geographic and locational aspects of the other strategies;</li> <li>• Framework for the development and land use in London;</li> <li>• London-wide strategic policy context within which boroughs should set their detailed local planning policies;</li> <li>• Policy framework for the Mayor's own decisions on the strategic planning applications; and</li> <li>• Essential part of achieving sustainable development, a healthy economy and more inclusive society in London.</li> </ul>	<p>Equality and inclusion</p> <p>Social integration</p> <p>Housing supply, quality, choice and affordability</p> <p>Sustainable land use</p> <p>Connectivity</p> <p>Economic competitiveness and employment</p> <p>Infrastructure</p> <p>Natural capital and natural environment</p> <p>Historic environment</p> <p>Materials and waste</p>	The Local Plan should consider the strategic direction of the London Plan in developing the Plan, ensuring an integrated approach and aiming to achieve sustainable development.	<a href="https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf">https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf</a>
The new Draft London Plan (showing minor suggested changes) August 2018	Not applicable	<p>The London Plan is:</p> <ul style="list-style-type: none"> <li>• Overall strategic plan for London for the development over the next 20-25 years, setting out an integrated framework (economic, environmental, transport and social);</li> <li>• Document that brings together the geographic and locational aspects of the other strategies;</li> <li>• Framework for the development and land use in London;</li> <li>• London-wide strategic policy context within which boroughs should set their detailed local planning policies;</li> <li>• Policy framework for the Mayor's own decisions on the strategic planning applications; and</li> </ul> <p>Essential part of achieving sustainable development, a healthy economy and more inclusive society in London.</p>	<p>Equality and inclusion</p> <p>Social integration</p> <p>Health and health inequalities</p> <p>Crime, safety and security</p> <p>Housing supply, quality, choice and affordability</p> <p>Sustainable land use</p> <p>Design</p> <p>Accessibility</p> <p>Connectivity</p> <p>Economic competitiveness and employment</p> <p>Infrastructure</p> <p>Education and skills</p> <p>Culture</p> <p>Air quality</p> <p>Climate change adaptation and</p>	The Local Plan should consider the strategic direction of the London Plan and ensure that it conforms with requirements set out in the document. The Local Plan's consistency with the London Plan will ensure an integrated approach and aim to achieve sustainable development using a similar framework.	<a href="https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0">https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0</a>

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			mitigation Energy use and supply Water resources and quality Flood risk Natural capital and natural environment Historic environment Geology and soils Materials and waste Noise and vibration		
The London Plan IIA Scoping Report (2017)	This scoping report contains a comprehensive and detailed baseline for the whole of London.	A new London Plan is to be prepared for adoption in 2019. As part of this process, an Integrated Impact Assessment (IIA) is being undertaken. The scoping report is the first stage and contains the proposed scope of the issues to be addressed in the IIA. The document identifies 24 key objectives, covering social, environmental and economic issues that the IIA will use to assess the viability and robustness of the new London Plan.	Equality and inclusion Social integration Health and health inequalities Crime, safety and security Housing supply, quality, choice and affordability Sustainable land use Design Accessibility Connectivity Economic competitiveness and employment Infrastructure Education and skills Culture Air quality Climate change adaptation and mitigation Energy use and supply Water resources and quality Flood risk Natural capital and natural environment Historic environment Geology and soils	The Local Plan should consider the IIA objectives proposed in this report as a means to assess the plan. This will ensure compliance and compatibility with the aims of the new London Plan at an early stage.	N/A

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			Materials and waste Noise and vibration		
The London Plan IIA Report (2017)	This assessment contains a comprehensive and detailed baseline for the whole of London	The London Plan Integrated Impact Assessment (IIA) process involves following the assessment methodology of a Strategic Environmental Assessment, whilst assessing Environmental, Equality, Health and Community Safety Impacts. The London Plan IIA aims to develop policies which meet objectives of all four assessments and help to maximise the benefits arising from policy implementation.	Equality and inclusion Social integration Health and health inequalities Crime, safety and security Housing supply, quality, choice and affordability Sustainable land use Design Accessibility Connectivity Economic competitiveness and employment Infrastructure Education and skills Culture Air quality Climate change adaptation and mitigation Energy use and supply Water resources and quality Flood risk Natural capital and natural environment Historic environment Geology and soils Materials and waste Noise and vibration	The Local Plan should consider the use of the London Plan IIA framework as a means to assess the plan and provide consistency with GLA documentation. This will ensure compliance and compatibility with the aims of the new London Plan and help the Local Plan to align with it at an early stage.	<a href="https://www.london.gov.uk/sites/default/files/draft_london_plan_iiia.pdf">https://www.london.gov.uk/sites/default/files/draft_london_plan_iiia.pdf</a>
City for all Londoners (2016)	Historical demographic and economic data is published	This document focuses on 5 key aspects which affect Londoners and identify the opportunities and challenges which face the London population. They include: <ul style="list-style-type: none"> <li>• Accommodating growth</li> <li>• Housing</li> <li>• Economy</li> <li>• Environment, Transport and public space</li> <li>• A city for all Londoners</li> </ul>	Accessibility Air quality Natural capital Homelessness Social inclusion Climate Change	The Local Plan should consider the 5 aspects set out in the City for all Londoners document and integrate these targets into its own aims and strategy.	<a href="https://www.london.gov.uk/sites/default/files/city_for_all_londoners_nov_2016.pdf">https://www.london.gov.uk/sites/default/files/city_for_all_londoners_nov_2016.pdf</a>

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London Industrial Land Demand (2017)	Data is provided on the historical levels of industry in different locations across London and across industries	This report assesses land demands for various types of industry and the amount of industrial land that London needs to maintain to ensure it continues to function as a successful and sustainable city.  The report considers the London industrial market in the context of the Wider South East economy, to examine existing linkages and consider how these may develop on the future.	Employment Economic competitiveness Connectivity	The Local Plan should consider The Industrial Land Demand, as well as the Industrial Land supply when creating its aims and strategies.	<a href="https://www.london.gov.uk/sites/default/files/ilds_final_report_june_2017.pdf">https://www.london.gov.uk/sites/default/files/ilds_final_report_june_2017.pdf</a>
London office policy review (2017)	Data provided on historical financial growth figures and office rent across London	The London Office Policy Review (LOPR) series provides a regular monitor to ensure that London Plan policies are focused on achieving the Mayor's objectives in this area. The document provides an independent review of market trends and associated time series data to illustrate key themes and their bearing on policy. LOPR 2017 will inform a full review of the London Plan and the preparation of Local Plans/Opportunity Area Planning Frameworks.	Employment Economic competitiveness Education and skills	The Local Plan should ensure it supports the office policy review as it informs the overarching London Plan that helps to align plans across London boroughs.	<a href="https://www.london.gov.uk/sites/default/files/london_office_policy_review_2017_final_17_06_07.pdf">https://www.london.gov.uk/sites/default/files/london_office_policy_review_2017_final_17_06_07.pdf</a>
Planning Authority Monitoring Report (2016/17)	Data provided on planning permission progress and development management	This document sets out progress against the Local Plan KPIs, information on funds secured through Community Infrastructure Levy and Section 106 agreements.	Economic competitiveness Employment Housing supply Design Infrastructure Sustainable Land Use Natural capital Historic environment Materials and waste	The Local Plan should ensure that it considers the existing planning permission targets and status when setting its own aims and strategy.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/planning/ppdt-documents/amr-2016-february-2017.ashx?la=en">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/planning/ppdt-documents/amr-2016-february-2017.ashx?la=en</a>
Older Londoners and The London Plan: Looking to 2050 (2016)	Data provided on historical demographics of older people in London, including economic and housing data	This document identifies the issues older people face in relation to spatial planning in London and aims to provide input towards the review of the London Plan up until 2050. The document outlines specific needs for older people, such as care facilities and mobility issues.	Accessibility Connectivity Infrastructure Housing Supply Social inclusion Energy use and supply Health and health inequalities Sustainable land use	The Local Plan should ensure that it supports Older Londoners and that aligns its targets and strategies with The London Plan.	<a href="https://www.london.gov.uk/sites/default/files/older_londoners_and_the_london_plan_report_march_2016.pdf">https://www.london.gov.uk/sites/default/files/older_londoners_and_the_london_plan_report_march_2016.pdf</a>
The Draft London Environment Strategy (2017)	This strategy is published alongside the General Assessment of London's environment which evaluates the current condition of London's environment	This document identifies the key environmental challenges in London including air quality, biodiversity, greenhouse gas emissions, green space, energy use, waste, heat risk, flood risk, water scarcity, water quality and ambient noise. The aims identified in the strategy are: <ul style="list-style-type: none"> <li>For London to have the best air quality of any major city by 2050;</li> </ul>	Health and health inequalities Housing supply, quality, choice and affordability Sustainable land use Design	The Local Plan should consider the aims set out in the environment strategy and integrate these targets into its own aims and strategy.	<a href="https://www.london.gov.uk/sites/default/files/draft_environment_strategy_-_executive_summary.pdf">https://www.london.gov.uk/sites/default/files/draft_environment_strategy_-_executive_summary.pdf</a>

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	at a city-wide level using high-level indicators.	<ul style="list-style-type: none"> <li>For more than half of London's area to be green and for tree cover to increase by 10% by 2050;</li> <li>For London to be a zero carbon city by 2050;</li> <li>To make London a zero waste city;</li> <li>For London and Londoners to be resilient to severe weather and long-term climate change impacts;</li> <li>To improve Londoners quality of life by reducing the number of people affected by noise.</li> </ul>	Economic competitiveness and employment Infrastructure Air quality Climate change adaptation and mitigation Energy use and supply Water resources and quality Flood risk Natural capital and natural environment Historic environment Geology and soils Materials and waste Noise and vibration		
London Housing Strategy. Draft for consultation (2017)	Not applicable	This document outlines the Mayor's vision for housing in the capital, alongside policies and proposals to achieve it. It outlines five priorities: <ul style="list-style-type: none"> <li>Building homes for Londoners;</li> <li>Delivering genuinely affordable homes;</li> <li>High quality homes and inclusive neighbourhoods;</li> <li>A fairer deal for private renters and leaseholders; and</li> <li>Tackling homelessness and helping rough sleepers</li> </ul>	Housing supply, quality, choice and affordability Infrastructure	The Local Plan should ensure it supports the priority areas outlined in this document.	<a href="https://www.london.gov.uk/sites/default/files/2017_london_draft_housing_strategy.pdf">https://www.london.gov.uk/sites/default/files/2017_london_draft_housing_strategy.pdf</a>
Housing in London 2017: The evidence base for the Mayor's Housing Strategy (2017)	Data is provided on the historical background, demographic and economic social context, housing supply, affordability and mobility	This document summarises key patterns and trends across a wide range of topics relevant to housing.	Housing supply, quality, choice and affordability Infrastructure	The Local Plan should consider the outcomes of the document, ensuring it supports future demand for housing.	<a href="https://files.datapress.com/london/dataset/housing-london/2017-01-26T18:50:00/Housing-in-London-2017-report.pdf">https://files.datapress.com/london/dataset/housing-london/2017-01-26T18:50:00/Housing-in-London-2017-report.pdf</a>
City of London Air Quality Strategy 2015 - 2020 (2015)	Some data is presented, including: Air quality in London (nitrogen dioxide, small particles (PM <sub>10</sub> ), fine particles PM <sub>2.5</sub> ); emissions from transport; and AQMAs.	This document focusses on measures to reduce levels of air pollution and help the UK Government and Mayor of London meet air quality limit values. More specifically, the aims of this strategy are to: <ul style="list-style-type: none"> <li>Build upon actions already taken and continue to reduce the impact of poor air quality on the health of City residents, workers and visitors, particularly those that are most vulnerable;</li> <li>Ensure that the City of London's key policies reflect the aims of improving air quality and reducing exposure to air pollution in the Square Mile;</li> </ul>	Air quality	This Local Plan should consider measures that can be taken to improve local air quality.	<a href="https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/city-of-london-air-quality-strategy-2015.pdf">https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/city-of-london-air-quality-strategy-2015.pdf</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
		<ul style="list-style-type: none"> <li>• Fulfil statutory obligations for Local Air Quality Management and public health, and assist the UK Government and Mayor of London in meeting air quality Limit Values as soon as possible;</li> <li>• Encourage and implement cost effective measures to reduce emissions of air pollutants in the Square Mile;</li> <li>• Build public awareness and understanding of air quality through the provision of accurate and timely information;</li> <li>• Recognise, reward and disseminate good practice and support air quality research and development;</li> <li>• Work in partnership with other organisations, to take a lead and help to shape national and regional air quality policy.</li> </ul>			
Draft Mayor's Transport strategy (2017)	Data presented on population, mode of travel, physical activity in transport, London's cycle network, NO <sub>2</sub> levels and CCZ traffic levels.	<p>This document sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years. The key objectives of the strategy are:</p> <ol style="list-style-type: none"> <li>1. Health Streets and healthy people;</li> <li>2. A good public transport experience; an</li> <li>3. New homes and jobs.</li> </ol>	Connectivity Infrastructure	The Local Plan should consider the promotion of the Health Streets approach, opportunities to improve the cycling network in London and good connectivity across London.	<a href="https://www.london.gov.uk/sites/default/files/2017_london_draft_housing_strategy.pdf">https://www.london.gov.uk/sites/default/files/2017_london_draft_housing_strategy.pdf</a>
Mayor's Biodiversity Strategy Update: A Review of Progress and Priorities for Action (2015)	Some data on the current status of London's biodiversity resource.	<p>This update of the Biodiversity Strategy sets out:</p> <ul style="list-style-type: none"> <li>• A summary of the current status of London's habitats and wildlife;</li> <li>• The progress which has been made on implementing the policies and proposals of the Mayor's Biodiversity Strategy;</li> <li>• How the policies and proposals relate to current Government policy, and;</li> <li>• The priorities for action going forward to optimise the collective efforts of the Mayor, the London Boroughs, statutory agencies, environmental organisations and Londoners to protect, manage and enhance London's natural environment.</li> </ul>	Natural capital and natural environment	The Local Plan should consider how biodiversity can be protected and enhanced.	<a href="https://www.london.gov.uk/LLDC/documents/s44476/05a%20Biodiversity%20Strategy%20Update%20-%20Appendix%201%20-%20Working%20Draft%20Document.pdf">https://www.london.gov.uk/LLDC/documents/s44476/05a%20Biodiversity%20Strategy%20Update%20-%20Appendix%201%20-%20Working%20Draft%20Document.pdf</a>
City of London Biodiversity Action Plan 2016 - 2020 (2016)	Some data on SINCs and target species	<p>The Biodiversity Action Plan (BAP) provides a strategic focus for decision makers. The aim of the BAP is to produce a set of objectives and actions to assist members of the City of London BAP Partnership Group and the wider City community in delivering biodiversity networks. More specifically, the BAP aims are:</p> <ul style="list-style-type: none"> <li>• Protecting and enhancing habitats and species;</li> <li>• Improving green infrastructure in the built environment;</li> <li>• Promoting a greater understanding of the City's biodiversity; and</li> </ul>	Natural capital and natural environment	The Local Plan should consider how biodiversity can be protected and enhanced.	<a href="https://www.cityoflondon.gov.uk/things-to-do/green-spaces/city-gardens/wildlife-and-nature/Documents/city-of-london-biodiversity-">https://www.cityoflondon.gov.uk/things-to-do/green-spaces/city-gardens/wildlife-and-nature/Documents/city-of-london-biodiversity-</a>

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		<ul style="list-style-type: none"> <li>Improving monitoring and data on biodiversity in the City of London.</li> </ul>			<a href="#">action-plan-2016-2020.pdf</a>
The Mayor's Economic Development Strategy for London (2010)	Data on London employment trends and employment projections.	<p>The Strategy sets out the Mayor's vision with respect to the London economy. The objectives are:</p> <ol style="list-style-type: none"> <li>to promote London as the world capital of business, the world's top international visitor destination, and the world's leading international centre of learning and creativity;</li> <li>to ensure that London has the most competitive business environment in the world;</li> <li>to make London one of the world's leading low carbon capitals by 2025 and a global leader in carbon finance;</li> <li>to give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers;</li> <li>to attract the investment in infrastructure and regeneration which London needs, to maximise the benefits from this investment and in particular from the opportunity created by the 2012 Olympic and Paralympic Games and their legacy.</li> </ol>	Economic competitiveness and employment	The objectives and guidance within the Local Plan need to be compatible with the objectives within the strategy.	<a href="https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Economic-Development-Strategy.pdf">https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Economic-Development-Strategy.pdf</a>
Souder City: The Mayor's Ambient Noise Strategy (2004)	Some background data including the GLA household survey 2002 noise source problem and noise complaints received by London Environmental Health Officers	<p>The objectives of the Strategy are to:</p> <ul style="list-style-type: none"> <li>Minimise road traffic noise adverse impacts;</li> <li>Encourage preferential use of vehicles (quieter operating conditions);</li> <li>Minimise noise from freight and servicing adverse impacts;</li> <li>Promote effective noise management on rail networks in London;</li> <li>Minimise aircraft noise adverse impacts (especially at night);</li> <li>Minimise noise on and around London's rivers and canals adverse impacts and enhance water space tranquillity and soundscape quality;</li> <li>Minimise industrial noise adverse impacts;</li> <li>Improve noise environment in London's neighbourhoods;</li> <li>Protect and enhance the tranquillity and soundscape quality of London's open spaces, green networks and public realm.</li> </ul>	Noise and vibration	The Local Plan should consider measures to improve the ambient noise environment.	<a href="https://www.london.gov.uk/sites/default/files/mayors_noise_strategy.pdf">https://www.london.gov.uk/sites/default/files/mayors_noise_strategy.pdf</a>
Securing London's Water Future: The Mayors Water Strategy (2011)	Not applicable	<p>The objectives of the Strategy are to:</p> <ul style="list-style-type: none"> <li>Use the water more effectively and efficiently;</li> <li>Minimise the release of untreated wastewater and diffuse pollution into the water environment</li> </ul>	Air quality Water resources and quality Flood risk	The Local Plan should consider improving water management and managing/reducing flood risk.	<a href="https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/water-">https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/water-</a>

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		<ul style="list-style-type: none"> <li>Manage (and reduce) the threat of flooding to people and their property;</li> <li>Reduce the greenhouse gas emissions produced from supplying water and treating wastewater.</li> </ul>			<a href="#">strategy-oct11.pdf</a>
Sustainable Design and Construction: The London Plan Supplementary Planning Guidance (2014) Supplementary Planning Guidance	Not applicable	<p>The objectives of this guidance are to:</p> <ul style="list-style-type: none"> <li>Provide detail on how to implement the sustainable design and construction and wider environmental sustainability policies in the London Plan;</li> <li>Provide guidance on how to develop more detailed local policies on sustainable design and construction;</li> <li>Provide best practice guidance on how to meet the sustainability targets set out in the London Plan; and</li> <li>Provide examples of how to implement sustainability measures within developments.</li> </ul>	Design Infrastructure Sustainable land use	The Local Plan should consider sustainable development from design through to construction. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf">https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf</a>
Affordable housing and viability Supplementary Planning Guidance (2017)	Not applicable	<p>This SPG outlines affordable housing and viability in four main parts:</p> <ol style="list-style-type: none"> <li>Background and approach- sets out rationale and aim. Sets out a long-term strategic aim of half of all new homes in London being affordable.</li> <li>Threshold approach- outlines this threshold approach to viability. Applications that meet/exceed 35% of housing provision do not need to submit viability information.</li> <li>Viability assessments- provides guidance on viability assessment to standardise the approach.</li> </ol> <p>Build to rent- defines build to rent and how it should be considered when assessing applications.</p>	Housing supply, quality, choice and affordability Sustainable land use	The Local Plan should ensure the provision of affordable housing and build to rent accommodation. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/sites/default/files/ah_viability_spg_2017_0816.pdf">https://www.london.gov.uk/sites/default/files/ah_viability_spg_2017_0816.pdf</a>
Housing Supplementary Planning Guidance (2016)	Not applicable	This SPG provides guidance on the implementation of housing policies of the 2015 London Plan. It provides guidance on achieving and exceeding housing targets, ensuring housing quality, providing adequate housing quality, viability appraisals, investment in existing housing stock and the provision of social infrastructure.	Housing supply, quality, choice and affordability Sustainable land use	The Local Plan should consider the guidance to ensure housing needs are met and that housing infrastructure and supporting infrastructure is adequate. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/sites/default/files/housing_spg_revised.pdf">https://www.london.gov.uk/sites/default/files/housing_spg_revised.pdf</a>
Social infrastructure Supplementary Planning Guidance (2015)	Not applicable	This SPG supports the London Plan policies on the protection and enhancement of social infrastructure, health and social care facilities, education facilities and sports facilities. It provides guidance on how these policies can be implemented which can be used when consider planning applications or preparing local plans.	Social integration Health and health inequalities Education	The Local Plan should consider the guidance in this document to ensure social infrastructure is adequately supported. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-</a>

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					<a href="#">guidance/social-infrastructure</a>
Accessible London Supplementary Planning Guidance (2014)	Not applicable	This SPG supports the Mayor's aim to ensure all residents, visitors or workers can participate and enjoy all the city offers. This is supported through the 2015 London Plan. This document provides guidance on the implementation of inclusive design principles effectively and creating an accessible environment, with a particular emphasis on disabled and older people needs.	Design Equality and inclusion	The Local Plan should promote equality of access and ensure public spaces support all needs. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/creating-london">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/creating-london</a>
Town Centres Supplementary Planning Guidance (2014)	Not applicable	This SPG provides guidance on the implementation of the Local Plan Town Centres policy, including development and management policies. This includes ensuring town centres are the main focal point beyond the CAZ, are sustainable and competitive and encourage a sense of place and local identity.	Design Equality and inclusion Infrastructure Sustainable land use Economic competitiveness and employment Social integration	The Local Plan should promote town centres to be competitive and social centres of the local community. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/town-centres">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/town-centres</a>
Character and context Supplementary Planning Guidance (2014)	Not applicable	This SPG provides: <ul style="list-style-type: none"> <li>• Guidance on the attributes of the character and context in London;</li> <li>• Information on resources that inform an understanding of character and context in London;</li> <li>• An analysis of the interrelationships between different aspects of character; and</li> </ul> Examples of good practice in how understanding character and context can make places more positive.	Design Sustainable land use Infrastructure	The Local Plan should ensure the character and context of the local area is enhanced and not put at risk by new development. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/character-and-context">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/character-and-context</a>
Trees and woodlands Supplementary Planning Guidance (2012)	Not applicable	Prepared jointly with the Forestry commission, this guidance implements the London Plan policies relating to the protection and enhancement of trees and woodlands. It supports the development of Borough Tree and Woodland Strategies which: <ul style="list-style-type: none"> <li>• Consider all trees in a borough as a single unified resource;</li> <li>• Apply asset management techniques to assess the financial value of the trees and woodlands;</li> <li>• Extend the concept of the urban forest from a single borough, to neighbouring authorities;</li> <li>• Enable boroughs to adopt consistent policy for looking after their own trees and support the management of trees that make a contribution on private land;</li> </ul>	Natural capital and natural environment	The Local Plan should promote the protection of trees and woodlands and new developments should contribute positively to the local natural environment. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland</a>

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		<ul style="list-style-type: none"> <li>Promote localism- get people involved in their local urban forests; and</li> </ul> Encourage joined up approaches to tree management.			
Land for industry and transport Supplementary Planning Guidance (2012)	Not applicable	This SPG provides guidance on the implementation of policies relating to land for industrial activities and transport outlined in the 2015 London Plan. It provides guidance to: <ul style="list-style-type: none"> <li>Ensure an adequate stock of industrial capacity to meet future needs;</li> <li>Plan monitor, and manage the release of surplus industrial land; and</li> </ul> Ensure the provision of sufficient land, suitably located for the development and expansion of the transport system.	Infrastructure Sustainable land use Connectivity	The Local Plan should ensure industrial land is sufficient to meet local needs now and in the future. It should similarly ensure the transport system is adequate and accessible for all. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/land-industry-and">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/land-industry-and</a>
Play and informal recreation Supplementary Planning Guidance	Not applicable	This SPG provides guidance on the implementation of the London Plan policies relating to play, informal activity and shaping neighbourhoods. It proposes benchmark standards which ensure the needs of all children and young people across London are met. This should be used alongside local standards. It also proposes a methodology for calculating play space requirements.	Social integration Health and health inequalities	The Local plan should support the provision of play and informal recreation which is accessible and safe. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/play-and-informal">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/play-and-informal</a>
Olympic Legacy Supplementary Planning Guidance (2012)	Not applicable	This SPG outlines the 2030 vision for London. It seeks to ensure the 2012 Olympic and Paralympic Games facilitated the delivery of a successful new part of the city and renewed the communities which support this. The four main aspects of this vision are: <ol style="list-style-type: none"> <li>To create a new part of London</li> <li>Growth and investment</li> <li>Metropolitan Stratford</li> <li>Improved connectivity</li> </ol>	Design Connectivity Social integration Economic competitiveness and employment Sustainable land use	The Local Plan must closely align with this vision, ensuring that it promotes a similar goal to ensure the 2012 Olympic legacy has positively impacted the local community.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/olympic-legacy">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/olympic-legacy</a>
All London's Green Grid Supplementary Planning Guidance (2012)	Not applicable	This SPG supports the delivery of the outcomes of the All London Green Grid (ALGG). The ALGG is built around four key elements: <ol style="list-style-type: none"> <li>London's existing river and other key landscape corridors</li> <li>Established open spaces and identified opportunities for new parks</li> <li>Existing and proposed green connections and corridors</li> <li>Designated and protected landscapes located at the boundary of London.</li> </ol> This SPG provides guidance on the implementation of the relevant London Plan policy to ensure the protection, conservation and enhancement of London's natural capital,	Natural capital and natural environment	The Local Plan should support the protection enhancement and conservation of local open spaces, green infrastructure and water courses. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/all-london-green-grid">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/all-london-green-grid</a>

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		increase the use of green infrastructure and develop a network of high quality green and open spaces.			
Planning for equality and inclusion (2017)	Not applicable	This SPG provides detailed guidance on the implementation of London Plan policies relating to community need and accessibility. It deals with promotion equality and diversity in the planning process, outlines the key social issues for London and highlights addressing the spatial needs of target equality groups.	Equality and inclusion Social integration Health and health inequalities	The Local Plan should support equality and inclusion through its policies to ensure the needs of the wider community and more vulnerable groups are met. It should be noted this guidance could change with the publication of the next London Plan.	<a href="https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/planning-equality-and">https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/planning-equality-and</a>
Joint Waste Development Plan for the East London Waste Authority Boroughs (2012)	Not applicable	The document sets out a planning strategy to 2021 for sustainable waste management. The objectives are to: <ul style="list-style-type: none"> <li>• Deliver sustainable development;</li> <li>• Work towards meeting targets set out in the Waste Strategy for England 2007 and the London Plan;</li> <li>• Enable the provision of a range of waste technologies;</li> <li>• Enable the provision of facilities to allow for net self-sufficiency;</li> <li>• Enable waste to be managed in one of the nearest appropriate installations</li> <li>• Integrate waste planning with other spatial concerns;</li> <li>• Reverse the historical trend of dumping ground for London's waste; and</li> <li>• Encourage our communities to take more responsibility for their waste.</li> </ul>	Materials and waste	The Local Plan needs to support sustainable waste management, encourage recycling and reuse and drive local waste management.	<a href="https://www3.havering.gov.uk/Documents/Planning/LDF/Adopted-Joint-Waste-DPD.pdf">https://www3.havering.gov.uk/Documents/Planning/LDF/Adopted-Joint-Waste-DPD.pdf</a>
North London: Strategic Flood Risk Assessment (2008)	Data is provided on: the setting the scene for each of the boroughs and planning policy and flood risk.	The summary of the objectives of this study includes: <ul style="list-style-type: none"> <li>• Identify the areas within North London that are at risk of flooding for all Flood Zones identified in table D1 in PPS 25, and within Flood Zone 3, the variations in the actual flood risk including the effect of any formal or informal flood defences;</li> <li>• Identify the risk of flooding due to surface water either in the form of flash flooding due to surface water run-off, rising groundwater, inadequate drain/sewer capacity or inadequate drain/sewer maintenance;</li> <li>• Identify the likely effects of climate change on flood risk</li> <li>• Identify catchment areas and the potential for development to affect flood risk in areas beyond the individual Borough boundaries;</li> <li>• Provide the basis for allocating sites in the Local Development Framework including, if necessary, applying the sequential test approach to site allocation within the indicative flood plain;</li> </ul>	Flood risk	The Local Plan should consider potential flood risk in the local area and how this could impact humans and assets within the at-risk areas. This Plan should aim to prevent development within floodplains.	<a href="http://www.nlwp.net/download/north-london-strategic-flood-risk-assessment/?wpdmdl=937">http://www.nlwp.net/download/north-london-strategic-flood-risk-assessment/?wpdmdl=937</a>

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		<ul style="list-style-type: none"> <li>• Provide a clear rationale for assessing the merits of potential development allocations based on a sequential flood risk assessment, taking into account the flood risk vulnerability of proposed uses (table D2, PPS25);</li> <li>• Recommend policy options for dealing with the range of flood risks and provide guidance for developers;</li> <li>• Recommend appropriate monitoring and review methods.</li> </ul>			
London's Natural Signatures: The London Landscape Framework (2011)	Some data is provided, including a list of natural landscape areas and natural signatures and data on geology, historic development, rivers and floodplains.	<p>The Framework aims to support and go beyond existing green space policy. Objectives are to:</p> <ul style="list-style-type: none"> <li>• Raise public awareness of the diversity of London's natural landscape</li> <li>• Ensure existing areas are managed/enhanced;</li> <li>• Ensure new development works with London's natural character;</li> <li>• Identify and protect views of and from key landscapes.</li> </ul>	Natural capital and natural environment Historic environment Geology and soils	The Local Plan should ensure the protection and enhancement of London's natural landscape.	<a href="http://publication.s.naturalengland.org.uk/file/6028196591960064">http://publication.s.naturalengland.org.uk/file/6028196591960064</a>
Green Infrastructure and Open Environments: The All London Green Grid Supplementary Planning Guidance (2012) and Draft All London Green Grid Lea Valley & Finchley Ridge Area Framework (2012)	Some data is provided, including: ALGG functions and green grid areas.	<p>The objectives of the guidance are to:</p> <ul style="list-style-type: none"> <li>• Protect, conserve and enhance London's strategic network of green and open natural and cultural spaces;</li> <li>• Encourage greater use of, and engagement with, London's green infrastructure;</li> <li>• Secure a network of high quality, well designed and multifunctional green and open spaces.</li> </ul> <p>The objectives of the Framework are:</p> <ul style="list-style-type: none"> <li>• Conserve landscape and the natural environment and increase access to nature;</li> <li>• Increase access to open space, the Green Belt and the urban fringe;</li> <li>• Adapting to climate change;</li> <li>• Making sustainable travel connections;</li> <li>• Enhance distinctive visitor destinations and boosting the visitor economy;</li> <li>• Promote healthy living;</li> <li>• Promote sustainable food production; and</li> <li>• Promote green skills and sustainable design, management and maintenance.</li> </ul>	Natural capital and natural environment Health and health inequalities Design Connectivity Economic competitiveness and employment Climate change adaptation and mitigation Natural capital and natural environment	<p>The Local Plan should ensure the protection and enhancement of London's natural landscape.</p> <p>The Local Plan should provide access, protection and enhancement to the natural environment. It should also promote healthy and sustainable living.</p>	<a href="https://www.london.gov.uk/sites/default/files/algg_spg_mar2012.pdf">https://www.london.gov.uk/sites/default/files/algg_spg_mar2012.pdf</a> and <a href="https://www.london.gov.uk%2Ffile%2F465383%2Fdownload%3Ftoken%3DB5t7X6vX&amp;usq=AFQjCNGQQHtPL39vE8akkyOX2QhvVlSyRw">www.london.gov.uk%2Ffile%2F465383%2Fdownload%3Ftoken%3DB5t7X6vX&amp;usq=AFQjCNGQQHtPL39vE8akkyOX2QhvVlSyRw</a>
Part 1: Thames River Basin District River Basin Management Plan (2015) and	Some data in part 1 is provided, including the current state of the environment and summary statistics between 2009 and 2015.	<p>The purpose of a river basin management plan is to provide a framework for protecting and enhancing the benefits provided by the water environment. More specifically, the management plan includes information on:</p> <ul style="list-style-type: none"> <li>• Baseline classification of water bodies;</li> <li>• Statutory objectives for protected areas;</li> <li>• Statutory objectives for water bodies; and</li> </ul>	Water resources and quality	The Local Plan should ensure the protection and enhancement of water bodies.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500548/Thames_RB_D_Part_1_river">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500548/Thames_RB_D_Part_1_river</a>

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Part 2: River Basin Management Planning Overview and Additional Information (2015)		<ul style="list-style-type: none"> <li>Summary programme of measures to achieve statutory objectives.</li> </ul> <p>The document outlines the target to ensure all 'bad' waterways are classified as 'good' by 2027.</p> <p>This document contains:</p> <ul style="list-style-type: none"> <li>Information that the WFD requires to be part of each plan; and</li> <li>Details about the process the Environment Agency and others have followed in reviewing and updating the plans.</li> </ul> <p>This document puts river basin management planning and the plans into the wider context of managing the water environment in England.</p>			<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500573/Part_2_River_basin_management_planning_process_overview_and_additional_information.pdf">basin_management_plan.pdf</a> and <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500573/Part_2_River_basin_management_planning_process_overview_and_additional_information.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500573/Part_2_River_basin_management_planning_process_overview_and_additional_information.pdf</a>
Thames Estuary 2100 (TE2100) 5 Year Monitoring Review (2016)	Data provided includes sea levels, tide levels, fluvial flows and flood defences.	<p>The aim of the plan is to manage tidal flood risk. Wider objectives include:</p> <ul style="list-style-type: none"> <li>The promotion of appropriate, sustainable and resilient development; and</li> <li>The protection of the social, cultural and commercial value of the River Thames.</li> </ul>	Flood Risk	The Local Plan should consider potential flood risk in the local area and how this could impact humans and assets within the at-risk areas.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/558630/TE2100_5_Year_Review.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/558630/TE2100_5_Year_Review.pdf</a>
Thames Catchment Flood Management Plan: Managing Flood Risk (2009)	Data provided includes current and future flood risk and the future direction of flood risk management	<p>The purpose of CFMP is to help the understanding of the scale and extent of flooding now and in the future, and set policies for managing flood risk within the catchment.</p> <p>The document should be used to inform planning and decision making by key stakeholders (Environment Agency; regional planning bodies and local authorities; water companies and other utilities; transportation planners; land owners; public and businesses).</p>	Flood Risk	The Local Plan should consider potential flood risk in the local area and how this could impact humans and assets within the at-risk areas.	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/293903/Thames_Catchment_Flood_Management_Plan.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/293903/Thames_Catchment_Flood_Management_Plan.pdf</a>
Transport for London Report 5 (2012)	Data provided includes key travel trends in London, performance of the transport network, safety and security in the transport system and air quality, climate change and transport-related noise	The document summarises key trends and developments relating to travel and transport in Greater London. The main objective is to provide an interpretative overview of progress towards implementing the transport and other related strategies together with an evidence and analysis base for the general use of stakeholders whose responsibilities cover many different aspects of transport and travel in London.	Infrastructure Connectivity Air quality Noise and vibration Climate change adaptation and mitigation	The Local Plan should give consideration to data outlined in this plan with regard to transport.	<a href="http://content.tfl.gov.uk/travel-in-london-report-5.pdf">http://content.tfl.gov.uk/travel-in-london-report-5.pdf</a>
Mayor of London and Growth Borough Strategic	This provides a high level overview of demographics in the London 2012 Olympic host boroughs.	The Strategic Regeneration Framework (SRF) brings together the regeneration of the physical area of the host boroughs and the socio-economic regeneration in the communities who live within it. It aims to improve conditions over the next 20 years for the people who live	Connectivity Equality and inclusion Health and health inequalities	The Local Plan objectives and guidance need to be compatible with the vision, objectives and policies within the strategy.	<a href="https://static1.squarespace.com/static/50b4ab77e4b0214dc1f631e9/t/50b4d086e4">https://static1.squarespace.com/static/50b4ab77e4b0214dc1f631e9/t/50b4d086e4</a>

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Regeneration Framework (2009)		within the 2012 Olympics host boroughs to ensure they can enjoy the same social and economic conditions as Londoners as a whole.	Design Sustainable land use Economic competitiveness and employment		b0214dc1f6888c/1354027142740/strategic-regeneration-framework-report.pdf
<b>Borough context</b>					
Hackney Joint Health and Wellbeing strategy 2015-2018 (2015)	This document provides a context review, identifying health and deprivation issues within the borough	The Hackney Joint health and wellbeing strategy sets out the priorities for Hackney's health and wellbeing board. This board leads and coordinates local collaborative efforts to improve health and wellbeing outcomes and reduce health inequalities. The document identifies a number of local health and wellbeing priorities: <ol style="list-style-type: none"> <li>1. Outcomes: focuses on areas where it can demonstrate the difference it brings for those people who need it most</li> <li>2. Inequality: tackle the causes of inequality in health and wellbeing and focus its efforts where needs are greatest</li> <li>3. Integration: ensure that service providers and care pathways will become more integrated</li> <li>4. Equality: ensure that services meet the needs of Hackney's diverse communities</li> <li>5. Value for money: ensure the best possible use of resources</li> <li>6. Influence: work closely with other health and wellbeing Boards and health agencies</li> <li>7. Engagement: engage with residents, service users and other local stakeholders.</li> </ol>	Health and health inequalities Equality and inclusion Education Design	The Local Plan should recognise that land use planning can contribute to the enhancement of quality of life and health. The Local Plan should encourage healthier lifestyles by promoting agendas such as active transport, healthy streets and access to healthy food.	<a href="https://www.hackney.gov.uk/jsna">https://www.hackney.gov.uk/jsna</a>
Hackney's Core Strategy 2010-2025 (2010)	The policy provides a broad baseline of the Borough focusing on demographics, economic and environmental factors.	The strategic policies contained within the Core Strategy reflect the Council's long-term vision and objectives for Hackney. The document contains: <ul style="list-style-type: none"> <li>• The Council's overall vision for the Borough and the six core strategy themes and 18 strategic objectives to enable the vision to be realised;</li> <li>• the spatial core policy; and</li> <li>• development control policy.</li> </ul> The Strategy aims to tackle inequality amongst Hackney residents and contribute to enhancing community cohesion across neighbourhoods through raising the quality of development and by building upon Hackney's distinctive strengths. The document contains specific targets for new developers, such as all major developments to achieve a target of at least 15% of their energy requirements to be	Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Education Culture Natural capital and natural environment Crime, security and safety Infrastructure Social integration	Although this document does not apply to the LLDC Planning Area, The objectives and guidance within the Local Plan need to be compatible with the vision, objectives and policies within the Strategy.	<a href="https://www.hackney.gov.uk/core-strategy">https://www.hackney.gov.uk/core-strategy</a>

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		provided through decentralised renewable or low carbon energy sources.	Health and health inequalities		
Hackney Strategic Housing Market Assessment (2014)	The policy provides overall trends in population and demographics for Hackney. It also provides an important overview of the current housing situation and future trends and demands.	The SHMA enables LB Hackney to assess housing need and demand to inform the development of local development documentation and housing policies. The document identifies key challenges including: the private rented sector; housing delivery; benefit reform; and the Duty to Co-operate on Councils through the 2011 Localism Act. The policy provides the objectively assessed housing need, considering population trends and market signals.	Housing supply, quality, choice and affordability Social integration Health and health inequalities Development Design Sustainable land use	The Local Plan evidence base must consider the outcomes of the document, ensuring it supports future demand for housing.	<a href="https://www.hackney.gov.uk/housing-strategy">https://www.hackney.gov.uk/housing-strategy</a>
Hackney health profile (2016)	This document provides an overview of the current health of Hackney including health inequalities, adult health, child health and deprivation	This Public Health England review provides a snapshot of the health in LB Hackney. Alongside other local information, this can help to support action by the local government and primary care trusts to tackle health inequalities and improve the Population's health. The information provided includes adult and child health, deprivation, health inequalities and local priorities.	Social integration Health and health inequalities Design Equality and inclusion	The Local Plan should recognise that land use planning can contribute to the enhancement of quality of life and health. The Local Plan should encourage healthier lifestyles, by promoting agendas such as active transport, healthy streets and access to healthy food.	<a href="http://fingertipsreports.phe.org.uk/health-profiles/2016/e09000012.pdf">http://fingertipsreports.phe.org.uk/health-profiles/2016/e09000012.pdf</a>
Hackney Homelessness Strategy 2015-2018 (2015)	This Strategy provides a demographic profile of the Borough and outlines housing issues and challenges.	The homelessness strategy's central aim is to deliver accessible services to prevent homelessness and assist homeless households in finding long term affordable and sustainable housing. This is underpinned by three key objectives: 1. To offer high quality, collaborative and innovative services to homeless households 2. To assist households at risk of homelessness to explore all options available to prevent homelessness 3. To find long terms housing solutions for people threatened with homelessness.	Housing supply, quality, choice and affordability Social integration Health and health inequalities	The Local Plan should consider the causes of homelessness and contribute to its prevention where possible.	<a href="https://www.hackney.gov.uk/media/7109/homelessness-strategy/pdf/homelessness-strategy">https://www.hackney.gov.uk/media/7109/homelessness-strategy/pdf/homelessness-strategy</a>
Hackney Housing Strategy 2010-2015 (2012 update)	The housing strategy identifies a number of key facts in Hackney regarding its population and housing provision.	The 2012 update to the 2010-2015 Housing Strategy identifies key changes between 2010 and 2012 and new challenges for Hackney. The objectives set out in the 2010 document remain relevant, but there has been a re-focus of some priorities in response to challenges in key areas: <ul style="list-style-type: none"> <li>Redoubling efforts to make the best possible use of the existing housing stock to meet housing demand;</li> <li>Maximising the supply of genuinely affordable homes without compromising the quality of liveability; and</li> <li>Responding to the impacts of the growth in the private rented sector and new benefits caps.</li> </ul>	Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Infrastructure Social integration Health and health inequalities	The Local Plan should consider LB Hackney's housing strategy to ensure it supports/complements the objectives outlined in this document and helps to address some of the key concerns raised.	<a href="https://www.hackney.gov.uk/media/4316/Hackney-housing-strategy-update-2012/pdf/housing-strategy-2012">https://www.hackney.gov.uk/media/4316/Hackney-housing-strategy-update-2012/pdf/housing-strategy-2012</a>

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LB of Hackney Level 2 Strategic Flood Risk Assessment (2010)	This document provides an overview of the flood-risk in Tower Hamlets, outlining sources of fluvial, tidal, surface water, sewer, groundwater and artificially-sourced flood risk.	The SFRA provides a strategic and proactive approach to flood risk management. A SFRA informs the forward planning process by helping to guide development proposals to those areas with the lowest flood risk in the context of wider sustainability considerations. This report builds upon the North London Level 1 SFRA and identifies key objectives including: <ul style="list-style-type: none"> <li>To enable planning policies to be identified to minimise and manage flood risks for the whole of the borough.</li> <li>To provide information needed to apply the Sequential Test within specific development proposals sites at medium or high flood risk in line with the principles of PPS25.</li> <li>To allow the London Borough of Hackney to assess the flood risk for specific development proposal sites, to ensure that development in such areas satisfies the requirements of the Exception Test.</li> <li>To consider the detailed nature of the flood hazard (flood depth, probability, velocity, rate of onset), taking into account the presence of flood risk management measures such as flood defences.</li> </ul>	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding and consider management approaches in at-risk areas.	<a href="https://www.hackney.gov.uk/media/3735/Strategic-flood-risk-assessment-level-2/pdf/Hackney-Level-2-SFRA-Report-Final">https://www.hackney.gov.uk/media/3735/Strategic-flood-risk-assessment-level-2/pdf/Hackney-Level-2-SFRA-Report-Final</a>
London Borough of Hackney, Statement of Community Involvement (2014)	Not applicable	This Statement sets out how the Council will involve all elements of the community in the planning process, both in the preparation of planning policy and involvement in planning applications	Public consultation	The Local Plan should have regard to this commitment and ensure the Plan follows a transparent processes	<a href="https://www.hackney.gov.uk/media/7063/Adopted-statement-of-community-involvement/pdf/Statement-of-community-involvement-2014">https://www.hackney.gov.uk/media/7063/Adopted-statement-of-community-involvement/pdf/Statement-of-community-involvement-2014</a>
Hackney Biodiversity Action Plan 2012-2017 (2012)	The BAP provides an overview of some of the key species and habitats found within LB Hackney.	The Biodiversity Action Plan identifies priority actions to deliver biodiversity improvements in Hackney. The document identifies six key Action Plans for different habitat types: <ol style="list-style-type: none"> <li>Built environment</li> <li>Homes and housing</li> <li>Parks and green spaces</li> <li>School grounds</li> <li>Wetlands and waterways</li> <li>Woodlands</li> </ol>	Natural capital and natural environment Social integration Health and health inequalities Air quality Water management Climate change mitigation and adaptation Equality and inclusion Design Sustainable land use	The Local Plan must carefully ensure that biodiversity is protected and enhanced in line with the BAP and support/complement the aims and objectives outlined in the BAP.	<a href="https://www.hackney.gov.uk/Assets/Documents/Biodiversity-Action-Plan-2012-2017.pdf">https://www.hackney.gov.uk/Assets/Documents/Biodiversity-Action-Plan-2012-2017.pdf</a>

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Hackney Surface Water Management Plan Final Draft (2013)	This document provides an overview of the 'Study Area', describing the LB Hackney' geology, topography, major rivers and waterways, significant infrastructure and significant future developments. The document also identifies Local Flood Risk Zones and Critical Drainage Areas.	A SWMP outlines the preferred surface water management strategy in a given location and establishes long-term action plans to manage surface water, influencing future investment, maintenance, land-use planning, emergency planning and future developments. The document has four main phases: <ul style="list-style-type: none"> <li>Phase 1: Preparation- collection and review of surface water data.</li> <li>Phase 2: Risk assessment- direct rainfall modelling to identify Local Flood Risk Zones and Critical Drainage Areas</li> <li>Phase 3: Options assessment- assessment of opportunities for measures to be implemented across the borough to reduce the impact of surface water flooding</li> <li>Phase 4: Implementation and review</li> </ul>	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding, particularly in local flood risk zone and critical drainage areas.	<a href="https://www.hackney.gov.uk/media/3745/Surface-water-management-plan-2010/pdf/Surface-Water-Management-Plan-2010">https://www.hackney.gov.uk/media/3745/Surface-water-management-plan-2010/pdf/Surface-Water-Management-Plan-2010</a>
Tower Hamlets Core Strategy 2025 (2010)	This document provides a brief overall history of the borough	The Core Strategy outlines the long-term spatial strategy to deliver the aspirations set out in the Community Plan (see below). It identifies broad areas and principles and where, how and when development should be delivered across the borough until 2025. It includes specific targets relating to affordable homes, new housing and tenure types.	Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Education Culture Natural capital and natural environment Crime, security and safety Infrastructure Social integration Health and health inequalities	Although this document does not apply to the LLDC Planning Area, The objectives and guidance within the Local Plan need to be compatible with the vision, objectives and policies within the Strategy.	<a href="http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Core-Strategy-and-MDD/Core-Strategy-low-resolution.pdf">http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Core-Strategy-and-MDD/Core-Strategy-low-resolution.pdf</a>
Tower Hamlets Partnership Community Plan (2015)	The community plan provides an overview of the history of Tower Hamlets and recent achievements related to housing and community assets.	The Community Plan outlines four key ambitions to make the borough: <ol style="list-style-type: none"> <li>A great place to live</li> <li>A fair and prosperous community</li> <li>A safe and cohesive community</li> <li>A healthy and supportive community</li> </ol> The plan outlines recent achievements and current challenges and commitments in relation to the four themes.	Social integration Health and health inequalities Design Equality and inclusion Crime, security and safety Housing supply, quality, choice and affordability	The Local Plan should consider the priority areas each borough has identified to ensure that it complements and supports these objectives.	<a href="http://www.towerhamlets.gov.uk/Documents/Adult-care-services/Community-Plan-2015-Final-Cabinet.pdf">http://www.towerhamlets.gov.uk/Documents/Adult-care-services/Community-Plan-2015-Final-Cabinet.pdf</a>

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Tower Hamlets health and wellbeing strategy: Towards a healthier Tower Hamlets 2017-2020 (2017)	This document provides a brief overview of health in Tower Hamlets and the reasons behind poor health in the borough.	This document outlines how physical and mental health and wellbeing can be improved within Tower Hamlets. The five priority areas outlined in this report are: <ol style="list-style-type: none"> <li>1. Communities Driving Change- changes led by and involving communities</li> <li>2. Creating a Healthier Place- changes to our physical environment</li> <li>3. Employment and Health- changes helping people with poor working conditions or who are unemployed</li> <li>4. Children's Weight and Nutrition- changes helping children to have a healthy weight, encouraging healthy eating and promoting physical activity</li> <li>5. Developing an Integrated System- changes which will join up services so they are easier to understand and access</li> </ol>	Social integration Health and health inequalities Design Equality and inclusion	The Local Plan should recognise that land use planning can contribute to the enhancement of quality of life and health. The Local Plan should encourage healthier lifestyles, by promoting agendas such as active transport, healthy streets and access to healthy food, which can help meet the priority areas outlined in this report.	<a href="http://www.towerhamlets.gov.uk/Documents/Public-Health/Health_Wellbeing_Strategy.pdf">http://www.towerhamlets.gov.uk/Documents/Public-Health/Health_Wellbeing_Strategy.pdf</a>
Tower Hamlets Health Profile (2016)	This document provides an overview of the current health of Tower Hamlets including health inequalities, adult health, child health and deprivation	This Public Health England review provides a snapshot of the health in LB Tower Hamlets. Alongside other local information, this can help to support action by the local government and primary care trusts to tackle health inequalities and improve the Population's health. The information provided includes adult and child health, deprivation, health inequalities and local priorities.	Social integration Health and health inequalities Design Equality and inclusion	The Local Plan should recognise that land use planning can contribute to the enhancement of quality of life and health. The Local Plan should encourage healthier lifestyles, by promoting agendas such as active transport, healthy streets and access to healthy food.	<a href="http://fingertipsreports.phe.org.uk/health-profiles/2016/e09000030.pdf">http://fingertipsreports.phe.org.uk/health-profiles/2016/e09000030.pdf</a>
Tower Hamlets Community Safety Partnership Plan 2013-2016 (2013)	This policy documents statistics for different types of crime and anti-social behaviour within the borough, and outlines historic trends.	This document outlines how the local authority aims to make Tower Hamlets a safer and more cohesive place to live. It identifies a number of key focus areas, such as: gangs and serious youth violence, anti-social behaviour, drugs and alcohol, hate crime, prostitution and reducing re-offending.	Crime, security and safety Social integration Design	The Local Plan should consider the issues outlined in this community safety partnership plan, ensuring that safety and social cohesion are considered in the plan and promote ways to design out crime in new developments.	<a href="http://www.towerhamlets.gov.uk/ignl/community_and_living/community_safety_crime_prevention/community_safety_partnership/csp_plan_2013-2016.aspx">http://www.towerhamlets.gov.uk/ignl/community_and_living/community_safety_crime_prevention/community_safety_partnership/csp_plan_2013-2016.aspx</a>
Tower Hamlets Strategic Housing Market Assessment (2014)	The policy provides overall trends in population and demographics for LB Tower Hamlets. It also provides an important overview of the current housing situation and future trends and demands.	The SHMA enables LB Tower Hamlets to assess housing need and demand to inform local development documentation and housing policies. The document identifies key challenges including: private rented sector; housing delivery; benefit reform; and the Duty to Cooperate on Councils through the 2011 Localism Act. The policy states the objectively assessed housing need, considering population trends and market signals.	Housing supply, quality, choice and affordability Social integration Health and health inequalities Infrastructure Design Sustainable land use	The Local Plan evidence base must consider the outcomes of the document, ensuring it addresses future demand for housing.	<a href="http://www.towerhamlets.gov.uk/Documents/Housing/Strategic_housing_market_assessment.pdf">http://www.towerhamlets.gov.uk/Documents/Housing/Strategic_housing_market_assessment.pdf</a>
Tower Hamlets Joint Strategic Needs	This document provides an outline of the existing	The JSNA looks at core datasets relating to demographics, health and wider determinants of health (such as crime, housing and employment). The assessment compares the	Social integration Health and health inequalities	The Local Plan should aim to contribute to healthier lifestyles and	<a href="http://www.towerhamlets.gov.uk/ignl/health_soci">http://www.towerhamlets.gov.uk/ignl/health_soci</a>

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Assessment (2015)	population and future population trends, health, health inequalities, deprivation and crime.	health and social care data to make recommendations to improve the health of the local population.	Design Equality and inclusion	improve overall mental and physical health and wellbeing.	<a href="http://al_care/joint_strategic_needs_assessment/joint_strategic_needs_assessment.aspx">al_care/joint_strategic_needs_assessment/joint_strategic_needs_assessment.aspx</a>
Tower Hamlets Draft 2016-2021 Homelessness Strategy outline (2016)	The strategy refers to the 2013-2017 Homeless statement, which itself provides a context review of homelessness trends in the borough.	The draft homelessness strategy refers to the aims of the homelessness statement 2013-2017, which remains relevant. This document sets out the borough's focus areas: <ul style="list-style-type: none"> <li>• Homeless prevention and tackling the causes of homelessness</li> <li>• Access to affordable housing options</li> <li>• Children, families and young people</li> <li>• Vulnerable adults.</li> </ul>	Housing supply, quality, choice and affordability Social integration Health and health inequalities	The Local Plan should consider the causes of homelessness and contribute to its prevention where possible.	<a href="https://democracy.towerhamlets.gov.uk/documents/s92629/Appendix%202-Homelessness%20Strategy%20Outline.pdf">https://democracy.towerhamlets.gov.uk/documents/s92629/Appendix%202-Homelessness%20Strategy%20Outline.pdf</a>
Tower Hamlets Housing Strategy 2016-2021 (2016)	The housing strategy identifies a number of key facts in Tower Hamlets regarding its population and housing provision.	The Tower Hamlets Housing Strategy identifies the vision of borough in four themes, reflecting the overarching community plan: <ol style="list-style-type: none"> <li>1. A great place to live</li> <li>2. A fair and prosperous community</li> <li>3. A safe and cohesive community</li> <li>4. A healthy and supportive community</li> </ol> The document highlights housing concerns within the borough including lack of new affordable housing; the growth of the private rented sector; anti-social behaviour on right-to-buy homes; and the need for licensing of private landlords.	Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Infrastructure Social integration Health and health inequalities	The Local Plan should consider LB Tower Hamlets housing strategy to ensure it supports/complements the objectives outlined in this document and helps to address some of the key concerns raised.	<a href="http://www.towerhamlets.gov.uk/Documents/Housing/TH_Housing_Strategy_document.pdf">http://www.towerhamlets.gov.uk/Documents/Housing/TH_Housing_Strategy_document.pdf</a>
Tower Hamlets Level 2 Strategic Flood Risk Assessment (2012)	This document provides an overview of the flood-risk in Tower Hamlets, outlining sources of fluvial, tidal, surface water, sewer and groundwater flood risk	The SFRA provides a strategic and proactive approach to flood risk management. It assesses current flood risk across the borough and how this is likely to change in the future. Local authorities and those responsible for development decisions must demonstrate that a risk based, sequential approach in preparing development plans has been applied. The underlying objective of the risk based sequential allocation of land is to reduce the exposure of new development to flooding and reduce the reliance on long-term maintenance of built flood defences.	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding and consider management approaches in at-risk areas.	<a href="http://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/LBTH-SFRA-Level-2-Vol-1-Part-1.pdf">http://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/LBTH-SFRA-Level-2-Vol-1-Part-1.pdf</a>
Tower Hamlets Statement of Community Involvement (2012)	Not applicable	This Statement sets out how the Council will involve all elements of the community in the planning process, both in the preparation of planning policy and involvement in planning applications.	Public consultation	The Local Plan should be mindful of this statement and ensure the Plan follows a transparent processes	<a href="http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/SCI-2012.pdf">http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/SCI-2012.pdf</a>

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Tower Hamlets Local Biodiversity Action Plan 2015-19 (2015)	The BAP provides an overview of some of the key species and habitats found within LB Tower Hamlets	The Biodiversity Action Plan identifies priority actions to deliver biodiversity improvements in Newham. The plan is split into four key action plans for different areas: <ol style="list-style-type: none"> <li>1. Built environment Action Plan</li> <li>2. Gardens and grounds Action Plan</li> <li>3. Rivers and standing water Action Plan</li> <li>4. Parks, squares and burial grounds Action Plan.</li> </ol>	Natural capital and natural environment Social integration Health and health inequalities Air quality Water management Climate change mitigation and adaptation Equality and inclusion Design Sustainable land use	This Local Plan must carefully ensure that biodiversity is protected and enhanced in line with the BAP and support/complement the aims and objectives outlined in the BAP.	<a href="https://democracy.towerhamlets.gov.uk/documents/s61441/6.1b%20App1%20-%20Local%20Biodiversity%20Action%20Plan%202014-19%20Final.pdf">https://democracy.towerhamlets.gov.uk/documents/s61441/6.1b%20App1%20-%20Local%20Biodiversity%20Action%20Plan%202014-19%20Final.pdf</a>
Tower Hamlets Surface Water Management Plan (2016)	This document provides an overview of the 'Study Area', describing the LB Tower Hamlets' geology, topography, major rivers and waterways, significant infrastructure and significant future developments. The document also identifies Local Flood Risk Zones and Critical Drainage Areas.	A SWMP outlines the preferred surface water management strategy in a given location and establishes long-term action plans to manage surface water, influencing future investment, maintenance, land-use planning, emergency planning and future developments. The document has four main phases: <ul style="list-style-type: none"> <li>• Phase 1: Preparation- collection and review of surface water data.</li> <li>• Phase 2: Risk assessment- direct rainfall modelling to identify Local Flood Risk Zones and Critical Drainage Areas</li> <li>• Phase 3: Options assessment- assessment of opportunities for measures to be implemented across the borough to reduce the impact of surface water flooding</li> <li>• Phase 4: Implementation and review</li> </ul>	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding, particularly in local flood risk zone and critical drainage areas.	<a href="http://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/DLT2-GP4-TowerHamlets-SWMP-V2.0-Merged.pdf">http://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/DLT2-GP4-TowerHamlets-SWMP-V2.0-Merged.pdf</a>
Tower Hamlets Conservation Strategy 2016-2026 (2016)	This document provides an outline of the heritage of Tower Hamlets', describing the history of its maritime trade, migration and people and places.	This document aims to protect and enhance the heritage of Tower Hamlets' and ensure heritage is appreciated and enjoyed by current and future generations. The document promotes community engagement and involvement in heritage as a critical part of ensuring on-going sustainability. It also aims to ensure heritage plays an active role in on-going and future regeneration and development.	Historic environment Culture	The Local Plan should aim to protect and enhance local heritage assets as part of its strategy, particularly alongside future developments which should respect the history of the local area.	<a href="http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Evidence_base_2016_Local_Plan/Conservation_Strategy_Consultation_Draft.pdf">http://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Evidence_base_2016_Local_Plan/Conservation_Strategy_Consultation_Draft.pdf</a>
Newham 2027, Newham's Local Plan-	This document provides a brief	The core strategy contains the spatial vision, challenges and opportunities faced by the borough, the sustainable community strategy and the core thematic policies of the	Housing supply, quality, choice and affordability	Although this document does not apply to the LLDC Planning Area, The objectives and guidance within the	<a href="https://www.newham.gov.uk/documents/enviroment">https://www.newham.gov.uk/documents/enviroment</a>

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The Core Strategy (2012)	overall history of the borough	strategy. Newham has an ambition to develop sustainably, building upon the area's heritage and location. It aims to ensure the borough is vibrant, dynamic, cohesive and ambitious and to maximise opportunities for transformation and regeneration in the years following the Olympic and Paralympic games. There are numerous targets in the strategy including requiring all developments to achieve a target of at least 15% of their energy from decentralised renewable or low carbon sources.	Sustainable land use Design Economic competitiveness and employment Education Culture Open spaces and green spaces Crime, security and safety Infrastructure Social integration Health and health inequalities	Local Plan need to be compatible with the vision, objectives and policies within the Strategy..	<a href="#">ment%20and%20planning/corestrategy2004-13.pdf</a>
Outer North East London Strategic Housing Market Assessment (2016)	The policy provides overall trends in population and demographics for the boroughs within Outer North East London. It also provides an important overview of the current housing situation and future trends and demands.	The SHMA for Outer North East London covers the LB of Newham in addition to Barking and Dagenham, Havering and Redbridge. This document outlines housing need and demand to inform the development of local development documentation and housing policies.	Housing supply, quality, choice and affordability Social integration Health and health inequalities Development Design Sustainable land use	The Local Plan evidence base must consider the outcomes of the document, ensuring it supports future demand for housing.	<a href="https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamStrategicHousingMarketAssessment[1].pdf">https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamStrategicHousingMarketAssessment[1].pdf</a>
Newham Joint Strategic Needs Assessment 2011-2012 (2011)	This document provides an outline of the existing population and future population trends, health, health inequalities, deprivation and crime.	The JSNA looks at core datasets relating to demographics, health and wider determinants of health (such as crime, housing and employment). The assessment compares the health and social care data to make recommendations to improve the health of the local population.	Social integration Health and health inequalities Design Equality and inclusion	The Local Plan should aim to contribute to healthier lifestyles and improve overall mental and physical health and wellbeing.	<a href="https://www.newham.gov.uk/Documents/Council%20and%20Democracy/JSNASept2012Update.pdf">https://www.newham.gov.uk/Documents/Council%20and%20Democracy/JSNASept2012Update.pdf</a>
Newham Strategic Flood Risk Assessment (2010)	This document provides an overview of the flood-risk in Newham, outlining sources of flooding, historic flooding and the probability of flooding	This document provides information regarding flood risk in LB Newham and informs the Newham Sustainability Appraisal, land allocations and other policies regarding flooding issues. The document looks at flood risk over the whole of the borough and specifically details areas where flood is a significant issue.	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding and consider management approaches in at-risk areas.	<a href="https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamSFRAVolume1DecisionSupport.pdf">https://www.newham.gov.uk/Documents/Environment%20and%20planning/NewhamSFRAVolume1DecisionSupport.pdf</a>
Newham Statement of Community	Not applicable	This Statement sets out how the Council will involve all elements of the community in the planning process, both in the preparation of planning policy and involvement in planning applications	Public consultation	The Local Plan should have regard to this commitment and ensure the Plan follows a transparent processes	<a href="https://www.newham.gov.uk/Documents/Environment%20and%20">https://www.newham.gov.uk/Documents/Environment%20and%20</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
Involvement (201)					<a href="#">Opplanning/StatementOfCommunityInvolvement.pdf</a>
Newham Biodiversity Action Plan (2010)	The BAP provides an overview of some of the key species and habitats found within LB Newham.	The Biodiversity Action Plan identifies priority actions to deliver biodiversity improvements in Newham. To complement the primary purpose of protecting and enhancing biodiversity in Newham, the delivery of the BAP also achieves other social and environmental objectives: <ul style="list-style-type: none"> <li>• human health benefits, both mental and physical</li> <li>• filtration of air and water, reducing pollution</li> <li>• contribute to a sense of place and enhance community pride</li> <li>• climate change adaptation and amelioration functions to help the LB Newham adapt.</li> </ul>	Natural capital and natural environment Social integration Health and health inequalities Air quality Water management Climate change mitigation and adaptation Equality and inclusion Design Sustainable land use	This Local Plan must carefully ensure that biodiversity is protected and enhanced in line with the BAP and support/complement the aims and objectives outlined in the BAP.	<a href="https://www.newham.gov.uk/Documents/Environment%20and%20planning/BiodiversityActionPlan.pdf">https://www.newham.gov.uk/Documents/Environment%20and%20planning/BiodiversityActionPlan.pdf</a>
Sugar House Lane Conservation Area – Character Appraisal and Management Proposals (2010)	This document provides an overview of the Sugar House Lane conservation area including topography, landscape, geology, history and townscape.	The council is required by the government to produce Conservation Area Appraisals and Management Plans for conservation areas. This document aims to: <ul style="list-style-type: none"> <li>• encourage appreciation of the area's history and present qualities;</li> <li>• identify opportunities for enhancement;</li> <li>• inform and guide those who want to make changes; and</li> <li>• support the Council in carrying out its planning and other functions.</li> </ul>	Social integration Health and health inequalities Development Design Sustainable land use	The Local Plan should consider the objectives and guidance outlined in this document.	<a href="https://www.newham.gov.uk/Documents/Environment%20and%20planning/SugarHouseLaneconservationareaappraisalandmanagementplan[1].pdf">https://www.newham.gov.uk/Documents/Environment%20and%20planning/SugarHouseLaneconservationareaappraisalandmanagementplan[1].pdf</a>
Three Mills Conservation Area: Character Appraisal and Management Proposals (2006)	This document provides an overview of the Three Mills Conservation Area in Newham.	This document provides the basis on which applications for development within the Three Mills Conservation Area can be assessed. The document specifically: <ul style="list-style-type: none"> <li>• defines the special interest of the conservation area and identifies the issues which threaten the special qualities of the conservation area; and</li> <li>• provides guidelines to prevent harm and achieve enhancement.</li> </ul>	Social integration Health and health inequalities Infrastructure Design Sustainable land use	The Local Plan should consider the objectives and guidance outlined in this document.	<a href="https://www.newham.gov.uk/Documents/Environment%20and%20planning/Three%20Mills%20appraisal%20and%20plan.pdf">https://www.newham.gov.uk/Documents/Environment%20and%20planning/Three%20Mills%20appraisal%20and%20plan.pdf</a>
Waltham Forest Local Plan Core Strategy (2012)	The document provides a key overview of Waltham Forest, outlining its geography, historical background, local character, transport connections, population, ethnic composition, health and deprivation, local	The LB Waltham Forest Core Strategy sets out the overarching policies to help secure the same life opportunities and experiences for the Waltham Forest community as those living elsewhere in London. The policy aims to maximise the benefits of regeneration whilst protecting places and spaces the community values most. The policy sets out the spatial vision for Waltham Forest in 2026 including plans for: <ul style="list-style-type: none"> <li>• Sustainable Regeneration</li> </ul>	Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Education Culture	Although this document does not apply to the LLDC Planning Area, The objectives and guidance within the Local Plan need to be compatible with the vision, objectives and policies within the Strategy.	<a href="https://branding.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf">https://branding.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
	economy, employment, homes, town centres, culture, leisure, public spaces and minerals.	<ul style="list-style-type: none"> <li>• Quality Homes</li> <li>• Sustainable Transport</li> <li>• Vibrant Town Centres</li> <li>• Dynamic Culture</li> <li>• Excellent Education</li> <li>• A Green Borough</li> <li>• Healthy Lifestyles</li> <li>• Inclusive Community</li> </ul>	<p>Natural capital and natural environment</p> <p>Crime, security and safety</p> <p>Infrastructure</p> <p>Social integration</p> <p>Health and health inequalities</p>		
Waltham Forest Health Profile (2016)	This document provides an overview of the current health of Waltham Forest, including health inequalities, adult health, child health and deprivation	This Public Health England review provides a snapshot of the health in LB Waltham Forest. With other local information, this can help to support action by the local government and primary care trusts to tackle health inequalities and improve the Population's health. The information provided includes adult and child health, deprivation, health inequalities and local priorities.	<p>Social integration</p> <p>Health and health inequalities</p> <p>Design</p> <p>Equality and inclusion</p>	The Local Plan should recognise that land use planning can contribute to the enhancement of quality of life and health. The Local Plan should encourage healthier lifestyles, by promoting agendas such as active transport, healthy streets and access to healthy food.	<a href="http://fingertipsreports.phe.org.uk/health-profiles/2016/e09000031.pdf">http://fingertipsreports.phe.org.uk/health-profiles/2016/e09000031.pdf</a>
Waltham Forest Safety Net Strategic Assessment (2010)	This document provides a crime overview of LB Waltham Forest, looking at the total notifiable offences for the borough and whether the borough is reaching targets regarding specific crimes (e.g. number of arson incidents)	This document provides a holistic overview of the current and future strategic issues pertaining to the LB Waltham Forest, focusing on crime and disorder, anti-social behaviour, environmental crime and substance misuse. It identifies five key strategic priorities: <ol style="list-style-type: none"> <li>1. Serious youth violence</li> <li>2. Residential burglary</li> <li>3. ASB</li> <li>4. Hate crime</li> <li>5. Domestic violence</li> </ol>	<p>Crime, security and safety</p> <p>Social integration</p> <p>Design</p>	The Local Plan should consider the key objectives and problem-areas to ensure the plan promotes healthy and safe communities.	<a href="https://branding.walthamforest.gov.uk/documents/ke34-waltham-forest-safety-net-strategic-assessment.pdf">https://branding.walthamforest.gov.uk/documents/ke34-waltham-forest-safety-net-strategic-assessment.pdf</a>
Waltham Forest Housing Needs Survey and Strategic Market Assessment (2012)	The policy provides overall trends in population and demographics for LB Waltham Forest. It also provides an important overview of the current housing situation and future trends and demands.	The SHMA enables the LB Waltham Forest to assess housing need and demand to inform the development of local development documentation and housing policies. The core outputs include: <ul style="list-style-type: none"> <li>• Estimates of current dwellings</li> <li>• Analysis of past and current market trends</li> <li>• Estimates of future households</li> <li>• Estimates of current households in housing needs</li> <li>• Estimates of future households that require affordable housing</li> <li>• Estimates of future households requiring marking housing</li> <li>• Estimates of the size of affordable housing required</li> <li>• Estimates of household groups who have particular housing requirements</li> </ul> <p>The assessment specifically outlines a need to provide 15,900 homes between 2010 and 2031.</p>	<p>Housing supply, quality, choice and affordability</p> <p>Social integration</p> <p>Health and health inequalities</p> <p>Development</p> <p>Design</p> <p>Sustainable land use</p>	The Local Plan evidence base must consider the outcomes of the document, ensuring it supports future demand for housing.	<a href="https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20Strategic%20Housing%20Market%20Assessment.pdf">https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20Strategic%20Housing%20Market%20Assessment.pdf</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
Waltham Forest Council Homelessness Prevention Strategy 2013-18 (2013)	The strategy provides a context review of homelessness trends in Waltham Forest prior to its 2013 publication.	The homelessness strategy supports the overarching housing strategy and other housing policies. Four main objectives are set out in the document: <ol style="list-style-type: none"> <li>1. Preventing homelessness and promoting alternative housing options</li> <li>2. Developing a response to the government's programme of welfare reform</li> <li>3. Providing appropriate accommodation and support for homeless households</li> <li>4. Supporting vulnerable people</li> </ol>	Housing supply, quality, choice and affordability Social integration Health and health inequalities	The Local Plan should consider the causes of homelessness and contribute to its prevention where possible.	<a href="https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20homelessness%20strategy-2013-18.pdf">https://www.walthamforest.gov.uk/sites/default/files/Waltham%20Forest%20homelessness%20strategy-2013-18.pdf</a>
Waltham Forest Housing Strategy 2008-2028 (2008)	The housing strategy identifies a number of key facts in Waltham Forest regarding its population and housing provision.	The housing strategy identifies the challenges and strengths Waltham Forest currently experiences regarding its housing provision. The policy outlines three main objectives, each with their own sub-objectives: <ol style="list-style-type: none"> <li>1. Building new homes (making development and regeneration happen; achieving economically balanced communities with more family homes; delivering the right homes in the right places)</li> <li>2. Making the most of the homes we have (renewing private housing; improving social rented housing; reducing overcrowding and under-occupation)</li> <li>3. Creating successful communities (enabling the right housing choices to be made; creating solutions for homelessness people and supporting independent living; making good quality and safe neighbourhoods; creating economic opportunities).</li> </ol>	Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Infrastructure Social integration Health and health inequalities	The Local Plan should consider the LB Waltham Forest housing strategy to ensure it supports / complements the objectives outlined in this document.	<a href="https://branding.walthamforest.gov.uk/documents/housing-strategy.pdf">https://branding.walthamforest.gov.uk/documents/housing-strategy.pdf</a>
Statement of Community Involvement, Waltham Forest (2007)	Not applicable	This Statement sets out how the Council will involve all elements of the community in the planning process, both in the preparation of planning policy and involvement in planning applications	Public consultation	The Local Plan should have regard to this commitment and ensure the Plan follows a transparent processes	<a href="https://branding.walthamforest.gov.uk/documents/sd06-statement-of-community-involvement.pdf">https://branding.walthamforest.gov.uk/documents/sd06-statement-of-community-involvement.pdf</a>
Waltham Forest Biodiversity Action Plan 2010-2020 (2011)	The BAP outlines seven habitats in Waltham Forest which are a priority for London, five other habitats which are of importance to Waltham Forest and a number of flagship species.	The Waltham Forest BAP addresses specific objectives for the conservation of key habitats and species, the raising of public awareness and the involvement of all sectors of the community. The six main objectives outlined are: <ul style="list-style-type: none"> <li>• To protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.</li> <li>• To ensure that developers, major landowners and organisations, including the Council, schools and colleges, the private sector and statutory undertakers, are aware of the importance of conserving biodiversity and are positively involved in the implementation of the BAP.</li> </ul>	Natural capital and natural environment Development	The Local Plan should consider the aims of the Waltham Forest BAP, ensuring biodiversity is protected/enhanced.	<a href="http://democracy.walthamforest.gov.uk/documents/s15424/">http://democracy.walthamforest.gov.uk/documents/s15424/</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
		<ul style="list-style-type: none"> <li>To ensure the proper consideration of biodiversity conservation in the management of all open space and amenity land in Waltham Forest.</li> <li>To seek opportunities for increasing the area and number of priority and locally important habitats.</li> <li>To develop the long term interest and involvement of people living and working in the Borough, including access to nature.</li> <li>To monitor and report on our progress against the targets within the BAP.</li> </ul>			
Waltham Forest Local Implementation Plan 2011	This document includes key transport characteristics in Waltham Forest	<p>The document sets out how the borough proposes to translate the Mayor's Transport Strategy (2010). It follows the six overarching goals which Waltham Forest should address:</p> <ul style="list-style-type: none"> <li>Supporting economic development and population growth in London</li> <li>Enhancing the quality of life for all Londoners</li> <li>Improving transport opportunities for all Londoners</li> <li>Reducing transports contribution to climate change and improving its resilience</li> <li>Supporting the delivery of the London 2012 Olympics and Paralympics and its legacy (note: a new draft Mayor's Transport Strategy was published in 2017)</li> </ul>	Transport Infrastructure Sustainable land use	The Local Plan should give consideration to the objectives outlined in this plan with regard to transport.	<a href="https://www.walthamforest.gov.uk/content/local-implementation-plan-lip2">https://www.walthamforest.gov.uk/content/local-implementation-plan-lip2</a>
Waltham Forest Council Level 2 Strategic Flood Risk Assessment (2011)	This document outlines characteristics of the 'Study Area', describing the LB of Waltham Forest's topography, river network and reservoir network and flood risk.	This document builds upon the North London Level 1 SFRA and provides more detailed information regarding the fluvial flood risk associated with the River Lee. The study uses hydraulic modelling to produce mapping outputs which define the flood extents and detail regarding likely flood depth and flood hazard classification during a range of flood events.	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding and consider management approaches in at-risk areas.	<a href="http://geosmartinfo.co.uk/wp-content/uploads/sfra/BEB15-Waltham-Forest-Level-2-SFRA.pdf">http://geosmartinfo.co.uk/wp-content/uploads/sfra/BEB15-Waltham-Forest-Level-2-SFRA.pdf</a>
London Borough of Waltham Forest, Surface Water Management Plan (2011)	This document provides an overview of the 'Study Area', describing the LB of Waltham Forest's geology, topography, major rivers and waterways, significant infrastructure and significant future developments. The document also identifies Local Flood	<p>A SWMP outlines the preferred surface water management strategy in a given location and establishes long-term action plans to manage surface water, influencing future investment, maintenance, land-use planning, emergency planning and future developments.</p> <p>The document has four main phases:</p> <ul style="list-style-type: none"> <li>Phase 1: Preparation- collection and review of surface water data.</li> <li>Phase 2: Risk assessment- direct rainfall modelling to identify Local Flood Risk Zones and Critical Drainage Areas</li> <li>Phase 3: Options assessment- assessment of opportunities for measures to be implemented across</li> </ul>	Flood risk Water management Climate change mitigation and adaptation	The Local Plan should seek to prevent development that may exacerbate flooding, particularly in local flood risk zone and critical drainage areas.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-examination-documents/borough-evidence-base-documents/beb16-waltham-forest-">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-examination-documents/borough-evidence-base-documents/beb16-waltham-forest-</a>



Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
	local socio-economic context	and through integration into core work problems in order to: <ol style="list-style-type: none"> <li>1. Establish high quality neighbourhoods and a new piece of East London, offering high standards of liveability, new homes and facilities for new and existing residents.</li> <li>2. Promote growth and economic development, attracting businesses, fostering innovation and entrepreneurship, and creating thousands of jobs.</li> <li>3. Build legacy careers, generating choices by establishing pathways for local people to access the jobs, apprenticeships, training and other opportunities created by development.</li> </ol>	Health and health inequality Education Accessibility Economic competitiveness and employment Housing supply, quality, choice and affordability Design	maximise the socio-economic benefits outlined in this policy.	<a href="/media/lldc/policies/119763483lldcsocioeconomicpolicy.ashx?la=en">/media/lldc/policies/119763483lldcsocioeconomicpolicy.ashx?la=en</a>
LLDC Sport and healthy living policy (2012)	This policy provides a number of statistics regarding active lifestyles, healthy living and sporting events.	This policy identifies how the LLDC will seek to promote and deliver community sport, high performance sport events, healthy living, active lifestyles, leisure, recreation and play opportunities following the London 2012 Olympic and Paralympic games. The sport and healthy living policy objectives are: <ol style="list-style-type: none"> <li>1. Promote and deliver community sports participation within the parkland and venues</li> <li>2. Promote high performance sport within sporting venues</li> <li>3. Host a range of events from international to community sporting events</li> <li>4. Facilitate the development of sports leaders, coaches, officials and volunteers</li> <li>5. Design and operate the Park as a catalyst for health living.</li> </ol>	Equality and inclusion Social integration Health and health inequality Education Accessibility Economic competitiveness and employment	The Local Plan must ensure that the objectives of this policy are promoted, particularly community events, healthy lifestyles and sport/health education and employment.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/finalsportandhealthylivingpolicyseptember2012.ashx?la=en">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/finalsportandhealthylivingpolicyseptember2012.ashx?la=en</a>
LLDC Community engagement policy (2012)	The policy outlines the current situation in regards to community engagement	This policy identifies the LLDC's responsibility to deliver the long-term legacy objectives after the 2012 Olympic and Paralympic games alongside community involvement. The policy identifies five engagement objectives for the future of the QEOP and surrounds: <ol style="list-style-type: none"> <li>1. Develop a local sense of ownership and responsibility</li> <li>2. Support successful community initiatives</li> <li>3. Establish clear communication and information sharing</li> <li>4. Enhance corporation social responsibility (internally and externally)</li> <li>5. Develop strong relationships and lasting partnerships</li> </ol>	Public consultation Equality and inclusion Social integration	The Local Plan should be a transparent process which involves local communities during the development of the Plan's objectives.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/119753959lldccommunityandengagementpolicy nov2012.ashx?la=en">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/119753959lldccommunityandengagementpolicy nov2012.ashx?la=en</a>
LLDC Statement of Community	Not applicable	This document outlines how the LLDC aims to involve the local community in the preparation of local planning documents and the determination of planning applications.	Public consultation	The Local Plan must be a transparent process which involves local	<a href="http://www.queenelizabetholympicpark.co.uk/-">http://www.queenelizabetholympicpark.co.uk/-</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
Involvement (2013)		It describes how consultation can be carried out and how to deal with comments.		communities during the development of the Plan's objectives.	/media/lldc/state mentofcommunit yinvolvementmar ch2013.ashx?la=en
LLDC Inclusive Design Strategy (2012)	This policy provides demographic statistics on the diversity of the population of the four neighbouring boroughs.	This strategy outlines the aim to design, build and manage venues, parklands and neighbourhoods in and around the QEOP in an inclusive and sustainable manner. The policy details the aim to create wholly inclusive neighbourhoods that work for a diverse population and meet the needs of the 21st century.	Equality and inclusion Social integration Health and health inequalities Design Sustainable land use Accessibility	The Local Plan must ensure equality and inclusion is promoted across a range of sectors, to increase accessibility for residents and visitors of the QEOP and neighbouring areas. This would include ensuring new developments are accessible and in line with the Equality Act, and promoting access to employment and educational opportunities.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/lldcinclusivedesignstrategy_march2013.ashx?la=en">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/lldcinclusivedesignstrategy_march2013.ashx?la=en</a>
LLDC Infrastructure Delivery Plan (2013)	This Option provides an overview of the social, transport and utilities infrastructure within the LLDC area.	The infrastructure delivery plan identifies social, transport and utilities infrastructure within the LLDC are between 2014 and 2031. It outlines anticipated growth in the LLDC area and provides an overview of education infrastructure, healthcare infrastructure, sport and leisure, open space, play space, libraries and community facilities, transport, and utilities.	Infrastructure Design Economic competitiveness and employment Education and skills Health and health inequalities Natural capital and natural environment	The Local Plan must ensure it supports the delivery of important infrastructure set out in this plan.	<a href="http://www.queenelizabetholympicpark.co.uk/~media/qeop/files/public/infrastructure_deliveryplan.pdf">http://www.queenelizabetholympicpark.co.uk/~media/qeop/files/public/infrastructure_deliveryplan.pdf</a>
Queen Elizabeth Olympic Park 2030 Sustainability guide	Not applicable	This report outlines how the QEOP, venues and events were developed to respond to and tackle environmental challenges, including changing climate, loss of biodiversity and overconsumption of vital resources. It identifies three key themes: 1. People- live sustainable, low carbon, resource efficient and healthy lives 2. Places- Sustain parkland, waterways and walkable neighbourhoods, preparing for climate change 3. Performance- Sustainable procurement and long-term environmental management.	Equality and inclusion Social integration Health and health inequalities Housing supply, quality, choice and affordability Sustainable land use Design Economic competitiveness and employment Infrastructure Education and skills Air quality Climate change adaptation and mitigation Energy use and	The Local Plan must ensure it helps to achieve the objectives set out in the Sustainability guide and promotes sustainable living and management within the Olympic Park and surrounding neighbourhoods.	<a href="http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/lldc_your_sustainability_guide_to_the_queen_elizabeth_olympic_park2030.ashx?la=en">http://www.queenelizabetholympicpark.co.uk/-/media/lldc/policies/lldc_your_sustainability_guide_to_the_queen_elizabeth_olympic_park2030.ashx?la=en</a>

Document title	Relevant baseline data	Key objectives of the document	Issues associated with the document	How can the Local Plan respond?	Web address
			supply Water resources and quality Flood risk Natural capital and natural environment Materials and waste		
Fish Island Management Guidelines	This document provides a historical overview of the Fish Island Management area.	This management guideline aims to ensure that proposals for development achieve the preservation and enhancement of Fish Island's special architectural and historic interest through restoration and refurbishment, redevelopment and management.	Culture Historic environment Design Sustainable land use Infrastructure	The Local Plan must consider the character and history of local areas when promoting development, particularly within conservation areas.	<a href="http://www.queenlizabetholympicpark.co.uk/-/media/lldc/conservation-areas/fiwpl-guidelines.ashx?la=en">http://www.queenlizabetholympicpark.co.uk/-/media/lldc/conservation-areas/fiwpl-guidelines.ashx?la=en</a>
Hackney Wick Management Guidelines	This document provides a historical overview of the Hackney Wick area.	This management guideline aims to ensure that proposals for development achieve the preservation and enhancement of Hackney Wick's special architectural and historic interest through restoration and refurbishment, redevelopment and management.	Culture Historic environment Design Sustainable land use Infrastructure	The Local Plan must consider the character and history of local areas when promoting development, particularly within conservation areas.	<a href="http://www.queenlizabetholympicpark.co.uk/-/media/lldc/conservation-areas/hw-guidelines.ashx?la=en">http://www.queenlizabetholympicpark.co.uk/-/media/lldc/conservation-areas/hw-guidelines.ashx?la=en</a>

## Appendix B

### Policy update screening table

Policy	Summary of change	Requirement for IIA?	Options
<b>Section 4 – Developing business growth, jobs, higher education and training</b>			
<b>Policy B.1 Location and maintenance of employment uses</b>	The Policy now includes additional references to the intensification, consolidation and co-location within industrial areas in relation to the new draft London Plan.	Assessment required to ensure the inclusion of intensification, consolidation and co-location are fully assessed within the IIA.	Option 1- Do not amend as is sound as existing  <b>Option 2a- Update to reflect new approach to industrial land within the draft London Plan to protect industrial floorspace capacity, making distinctions between the different types of employment cluster</b>  Option 2b- Update to reflect new approach to industrial land within the draft London Plan to protect industrial floorspace capacity with a unified approach to employment clusters
<b>Policy B.2 Thriving town, neighbourhood and local centres</b>	Additional text has been added to the Policy related to the proximity of takeaways to schools, emphasis on the night time economy and visitor infrastructure, and the potential international designations of Stratford. This is based on the new draft London Plan.  Additional changes to reflect the draft NPPF has also been included in relation to drawing centre boundaries and primary and secondary frontages.	Assessment required to fully understand the implications of the changes, particularly the designation of Stratford and designation of primary and secondary frontages in line with the NPPF.	
<b>Policy B.3 Creating vitality through interim uses</b>	Changes to include the possibility of interim use contributing to housing requirements or the night time economy and the support for creating and improving public realm.	Assessment required to ensure the addition of housing and public realm creation is fully assessed within the IIA.	
<b>Policy B.4 Providing low-cost and managed workspaces</b>	Minor amendments to reflect the draft London Plan wording, which makes distinctions between affordable and low-cost workspace.	Reassessment not required. The minor amendments to wording have not significant changed the aims and outcomes of the policy.	
<b>Policy B.5 Increasing local access to jobs, skills and employment training</b>	Minor updates to policy to reflect terminology of the London Plan. No change to the Policy text, but additional text added to the supporting text around ensuring apprenticeship and training is completed and potential take-up is maximised.	The additional wording in the supporting text has not significantly changed the aims and outcomes of the policy.	Option 2a- Update to amend the trigger with additional reference to equivalent construction value and to reflect draft London Plan requirements  <b>Option 2b- Update to reflect draft London Plan requirements</b>
<b>Policy B.6 Higher education, research and development</b>	No change to Policy wording	Reassessment not required as Policy has remained the same.	
<b>Section 5 – Providing housing and neighbourhoods</b>			
<b>SP.2: Maximising housing and infrastructure provision within new neighbourhoods</b>	Policy has been split in two. This Policy reflects the draft new London Plan affordable housing targets. The housing delivery target has increased from 1,471 to 2,161 housing units per annum. Affordable housing targets have also been added to the Policy.	Reassessment not required. The minor amendments to wording have not significant changed the aims and outcomes of the policy.	Option 1- update to the housing target and an annual figure for affordable housing based upon 35% provision  <b>Option 2- update to the housing target and percentage requirement for affordable housing with clear viability thresholds</b>
<b>H.1 Providing for and diversifying the housing mix</b>	Additional text added around small sites and the management and ownership of Built to Rent housing to reflect the draft London Plan. This has also therefore incorporated the H.7 Private Rented Sector policy from the previous Local Plan revision. The Policy also now references a mix of tenure types and inclusive communities.	Assessment required to ensure the use of small sites and built to rent housing requirements are assessed within the IIA. Additionally, references to tenure and inclusivity will also be assessed, particularly within the EqIA.	Option 1- to update from HRS evidence requirements on housing mix requirements  Option 1b- as above plus London Plan direction for housing delivery including small sites and reference to design codes  Option 2- to update from HRS evidence requirements on housing mix requirements with increased specificity

			<p>Option 2b- as above plus London Plan direction for housing delivery including small sites and reference to design codes</p> <p>Option 3- as 2a plus inclusion of Build To Rent specifically (see Policy H.7 below)</p> <p><b>Option 3b- as 2b plus inclusion of Build To Rent specifically (see Policy H.7 below)</b></p>
<b>H.2: Delivering affordable housing</b>	Affordable housing requirements have become more specific, with sites of more than ten units, or over 1000sqm floorspace, having to provide affordable units. The Policy also covers the relevant thresholds set out in SP.2 and references the Mayor's Fast Track and Viability Tested Routes in line with the London Plan.	Assessment required to ensure the more specific requirements for the provision of affordable housing are fully understood within the IIA.	<p>Option 1a- Update to reflect draft London Plan requirements and within AHV SPG including by habitable room setting out local requirement for the 40% based upon HRS information</p> <p>Option 1b- Update to reflect draft London Plan requirements and within AHV SPG including by habitable room utilising HRS housing requirements information</p> <p><b>Option 2a- as 1a plus reference to Build To Rent (see Policy H.7 below)</b></p> <p>Option 2b- as 1b plus reference to Build To Rent (see Policy H.7 below)</p>
<b>H.3: Meeting accommodation needs of older persons households</b>	The Policy has been updated to reflect the draft London Plan. The Policy now makes reference to social infrastructure, specialist accommodation, inclusive design and affordable housing.	Assessment required to ensure the addition of social infrastructure and inclusivity is assessed within the IIA.	<p>Option 1- update to reflect draft London Plan policy H15</p> <p><b>Option 2a- update to reflect draft London Plan policy H15 and include updated C2/C3 distinctions</b></p> <p>Option 2b- as 2a plus other/new forms of accommodation to meet needs</p>
<b>H.4 Providing student accommodation</b>	The Policy has been updated to reflect the draft London Plan, particularly around the 35% provision of affordable student accommodation and the requirement to ensure accommodation is located in appropriate and well-connected areas. The Policy also now refers to the impact transient students can have on neighbourhoods.	Assessment required to ensure the percentage requirement for student accommodation is fully understood and that the impact on local communities is assessed within the IIA.	<p>Option 1- to reflect draft London Plan considerations</p> <p><b>Option 2- to reflect draft London Plan considerations with locational preferences</b></p>
<b>H.5 Location of gypsy and traveller accommodation</b>	The Policy has been updated to reflect the definition of gypsy and travellers in the draft London Plan. The Supporting text also sets out specific requirements from the Housing Requirements Study (2018). Rather than provide between ten and 19 pitches, nine pitches must now be provided till 2036, plus an additional 16 pitches arising from households falling within the London Plan definition, but not the planning definition.	Assessment required to ensure the change to gypsy and traveller accommodation provision is fully understood within the IIA.	<p>Option 1- update to reflect new London Plan definitions</p> <p><b>Option 2- update to reflect new London Plan definitions plus further reference to duty to cooperate</b></p>
<b>H.6 Houses in Multiple Occupation</b>	The Policy has been updated to include reference to cash in lieu and viability testing requirements for schemes over 22 units. The Policy also makes reference to the importance of HMOs for younger households.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>H.7 Shared living accommodation</b>	This a new policy to reflect changes in the draft London Plan. It covers proposals for large scale shared living accommodation, ensuring they are in a suitable location, appropriate managed, of a high design and sustainable.	This is a new policy which will require assessment under this IIA.	<p>Option 1- do not include a shared living policy and rely upon London Plan H18</p> <p>Option 2- include a local shared living policy to take account of H18 with local definitions</p> <p><b>Option 3- include a local shared living policy to take account of H18 with local definitions and locational direction</b></p>

			Option 4- refer to shared living as one product within a new 'Innovative Housing models' policy
<b>H.8 Innovative housing models</b>	This is a new policy which reflects consultation responses in relation to flexible forms of accommodation and the emergence of new housing products across the market. It ensures these innovative homes still contribute to the strategic housing supply, meet local need, provide the appropriate percentage of affordable housing and meet relevant design standards.	This is a new policy which will require assessment under this IIA.	
<b>Section 6 Creating a high quality and built natural environment</b>			
<b>SP.3 Integrating the natural and built environment</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.1 Responding to place</b>	Very minor changes to wording.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>BN.2 Creating distinctive waterway environments</b>	No change to Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.3 Maximising biodiversity</b>	Minor changes to the Policy wording based on consultation responses.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>BN.4 Designing development</b>	The reference to baseline quality standards has been removed and replaced with a reference to consider the LLDC Design Quality Policy.	Assessment required to understand the Policy impact with the inclusion of the LLDC Design Quality Policy rather than baseline quality standards.	<p>Option 1: redraft policy to simply exclude reference to the Baseline Standards and refer only to the Nationally Described Space Standards.</p> <p>Option 2: replace reference to the baseline standards with reference to the LLDC Design Quality Policy as a source of guidance on approach to quality standards for all development in the LLDC area</p> <p><b>Option 3- Redraft policy to exclude reference to the Baseline Standards, add reference to the LLDC Design Quality Policy and include the generally applicable policy elements of Policy BN.10. This would also include the rebadging of the policy to include mixed-use development and a reference to non-residential development. This would form part of a wider revamp of built design policies, in particular Policy BN.10 which would be made more specific. In this scenario Policy BN.10 would be relocated to follow on from Policy BN.4.</b></p>
<b>BN.5 Proposals for tall buildings</b>	Policy scope has increased to include tall buildings both inside and outside the Centre boundaries.	Assessment required to ensure the change of scope is fully understood within the IIA.	<p>Option 1: no change, with policy wording retained as in current plan. Policy seen as a helpful tool in addressing development height without being prescriptive.</p> <p>Option 2: minor amendments to the policy to clarify expectations in terms of the "outstanding architecture" requirement in the policy where this has been a point of contention in interpretation of the policy in practice. This would clarify that meeting the relevant tests in the Policy will be what defines this term. subsequent points in the policy.</p> <p><b>Option 3: adds amendment to the relevant parts of the four sub area sections in the Plan that define the building height at which Policy BN.10 will apply. These aim to achieve greater consistency between the approach across the sub area sections of the</b></p>

			<b>Plan. The specific changes are identified in the changes for each sub area in this document.</b>
<b>BN.6 Requiring inclusive design</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.7 Protecting Metropolitan Open Land</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.8 Improving local open space</b>	No change to the Policy wording, however a new map of local open spaces is to be included.	Reassessment not required. The Policy text has remained the same and the map provides more context.	
<b>BN.9 Maximising opportunities for play</b>	Minor changes to the Policy wording to include a reference to young people, in addition to children.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>BN.10 Protecting key views</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.11 Air Quality</b>	Policy split in two. The air quality element has been amended to also increase reference to improving air quality.	Assessment required to ensure the IIA reflects the aims to improve air quality standards.	
<b>BN.12 Noise</b>	Policy split in two. The noise element now also includes a reference to the Agent of Change Principle, in line with the draft London Plan.	Assessment required to ensure the addition of the Agent of Change Principle, which ensures new developments mitigate and manage noise impacts for existing users and residents, are fully considered within the IIA.	
<b>BN.13 Protecting archaeological interest</b>	The Policy text has not been amended, but the accompanying figure now includes the updates to the Archaeological Protection Area.	Reassessment not required. The Policy text has remained the same and the updates to the figure keep the context relevant.	
<b>BN.14 Improving the quality of land</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.15 Designing residential extensions</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.16 Designing advertisements</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>BN.17 Conserving or enhancing heritage assets</b>	Additional text added to the Policy. This sets out the requirement for proposals to ensure they preserve/enhance heritage interest, enhance/reveal the significant of heritage assets, restore/reuse heritage assets within the application boundaries, exhibit an understanding of historical interest of the area and retain/provide street trees where appropriate.	Assessment required due to the significant addition to this text which sets out the requirements proposals must follow in relation to heritage assets. This will be assessed within the IIA.	
<b>Section 7 Planning and securing the transport infrastructure to support growth and convergence</b>			
<b>SP.4: Planning for and securing transport infrastructure to support growth and convergence</b>	References to utilities have been removed from this Policy and consolidated within Section 8.	Assessment required to ensure the IIA exclusively assess transport infrastructure under this new policy arrangement.	
<b>T.1 Strategic transport improvements</b>	The Policy has been updated to include improvements to Stratford Station and to upgrade the strategic network.	Reassessment not required. The additional text has not changed the aims and outcomes of the Policy.	
<b>T.2 Transport improvements</b>	The Policy has been amended to include a reference to the Healthy Streets agenda, as outlined in the draft London Plan.	Assessment required to ensure the outcomes of the Healthy Streets approach is fully assessed within the IIA, particularly under the HIA.	
<b>T.3 Supporting transport schemes</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>T.4 Managing development and its transport impacts of promote sustainable transport choices, facilitate local connectivity and prioritise pedestrians and cyclists</b>	The Policy has been amended to include a reference to the Healthy Streets agenda, as outlined in the draft London Plan.	Assessment required to ensure the outcomes of the Healthy Streets approach is fully assessed within the IIA, particularly under the HIA.	
<b>T.5 Street network</b>	The Policy has been amended to include a reference to the Healthy Streets agenda, as outlined in the draft London Plan.	Assessment required to ensure the outcomes of the Healthy Streets approach is fully assessed within the IIA, particularly under the HIA.	
<b>T.6 Facilitating local connectivity</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	

<b>T.7 Transport assessments and travel plans</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>T.8 Parking and parking standards in new development</b>	This Policy has been changed to reflect the draft London Plan. It now makes reference to car-free developments, rather than low levels of cars. It also sets a requirement for developers to submit a car park design and management plan and where redevelopment of an existing site occurs, parking should be reduced or adjusted to reflect this.	Assessment required to ensure the preference for car-free developments is fully understood within the IIA.	
<b>T.9 Providing for pedestrians and cyclists</b>	The Policy has been amended to include a reference to the Healthy Streets agenda, as outlined in the draft London Plan.	Assessment required to ensure the outcomes of the Healthy Streets approach is fully assessed within the IIA, particularly under the HIA.	
<b>T 10 Using the waterways for transport</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>Section 8 Creating a sustainable place to live and work</b>			
<b>SP5 A Sustainable and healthy place to live and work</b>	This strategic policy has been amended in line with the draft London Plan targets. The target to reduce CO <sub>2</sub> by 60% by 2025 has been amended to London becoming a zero-carbon city by 2050. Additionally, this Policy references the aim to ensure there is zero biodegradable recyclable waste to landfill by 2020, the requirement to retain existing waste management facilities, to support the delivery of the Mayor's target of 80% of all trips in London to be made on foot, cycle or public transport by 2041, and to support the provision and expansion of digital infrastructure.	Assessment required to ensure the IIA considers the updated carbon and transport targets and waste management requirements.	
<b>S.1 Health and wellbeing</b>	The Policy has been amended to reflect the Health Streets agenda in the draft London Plan. It sets out a requirement for development schemes to outline how they will deliver improvements that support the ten Health Streets Indicators, and to outline how the developments will reduce the dominance of vehicles.	Assessment required to ensure the outcomes of the Healthy Streets approach is fully assessed within the IIA, particularly under the HIA.	
<b>S.2 Energy in new development</b>	The Policy has been amended to reflect the draft London Plan targets. The target for major developments is now to be net zero-carbon. Carbon dioxide emission reduction targets have changed from 40% of the Building Regulations to 35%. The reference to energy statement preparation has been removed.	Assessment required to ensure the IIA considers the updated targets and changes to the energy requirements in new developments.	
<b>S.3 Energy infrastructure and heat networks</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>S.4 Sustainable design and construction</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>S.5 Water supply and waste water disposal</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>S.6 Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure</b>	The Policy text has changed significantly to reflect the increasing importance of digital communications. The Policy sets out a target to achieve greater digital connectivity, to safeguard existing communications infrastructure, to co-locate services where possible (including the effective use of the public realm) and to ensure sufficient space for future connectivity requirements. The Policy also reflect how increased connectivity can support zero-carbon and healthy street approaches.	Assessment required to reflect the greater requirements set out in the Policy, and how greater connectivity can support other aims and targets, including the healthy streets approach and zero-carbon city.	
<b>S.7: Planning for waste</b>	Minor change to the Policy text to reflect the draft London Plan.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>S.8: Waste reduction</b>	Minor amendment to the Policy to include a reference to a more circular economy.		

<b>S.9 Overheating and urban greening</b>	Minor amendment to reflect the new target of a Zero-Carbon city by 2050.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>S.10: Flood risk</b>	The Policy has been split up, with the sustainable drainage measures being moved in to a standalone policy.	Assessment required to ensure flood risk is assessed as a standalone policy under the IIA.	
<b>S.11 Sustainable drainage measures and flood protection</b>	The Policy has been split up, with the sustainable drainage measures being moved into this standalone policy. A reference to the drainage hierarchy within the London Plan has been added. The Policy also sets out a support for developments which do not include proposals for impermeable paving.	Assessment required to ensure the inclusion of the drainage hierarchy and support for developments free from impermeable paving are assessed within the IIA.	
<b>S.12 Resilience, safety and security</b>	This is a new Policy which reflects the aims of the draft London Plan to create a more resilient city. The Policy supports ensuring new developments are resilient and design out crime. Where possible, security and safety measures should support the Healthy Streets vision and create spaces which feel safe.	This is a new policy which will require assessment under this IIA.	
<b>Section 10 – Sub Area 1 Hackney Wick and Fish Island</b>			
<b>Policy 1.1 Managing change in Hackney Wick and Fish Island</b>	Minor additional text which references local retail and leisure uses within the Neighbourhood Centre Boundary.	Reassessment not required. The small changes to the wording have not changed the overall aims and outcomes of the Policy.	
<b>1.2 Promoting Hackney Wick and Fish Island's unique identity</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>1.3 Connecting Hackney Wick and Fish Island</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>1.4 Preserving or enhancing heritage assets in Hackney Wick and Fish Island</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>1.5 Improving the public and private realm in Hackney Wick and Fish Island</b>	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
<b>SA1.1 Hackney Wick Station Area</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
<b>SA1.2 Hamlet Industrial Estate</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
<b>SA1.3 Hepscott Road</b>	Minor changes to include a reference to borough waste requirements in Policy IN.2.	Reassessment not required. Additional text has not altered the overall site allocation policy. Options have not been appraised where the site allocation has removed developments which have been implemented, as the effects will have already been realised.	No change to the site allocation policy.  <b>Amend the site allocation wording in respect of waste issues.</b>  Delete the site allocation (only if the current planning applications have been permitted and commenced).
<b>SA1.6 Neptune Wharf</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
<b>SA1.7 East Wick</b>	The site allocation policy has removed the Here East aspect as this area is now developed and becoming a technology business hub. The East Wick aspects remain and the site allocation policy also includes the delivery of two new nurseries.	Reassessment not required. Additional text has not altered the overall site allocation policy. Options have not been appraised where the site allocation has removed developments which have been implemented, as the effects will have already been realised.	Leave site allocation unchanged.  Update site allocation to exclude the requirement for a primary school.  <b>Update site allocation to exclude Here East and the School and playing fields.</b>
<b>SA1.8 Sweetwater</b>	The provision of a primary school in this allocation has been removed and a reference to it being served by the existing adjacent school added.	Reassessment not required. The minor amendments to wording have not significant changed the aims and outcomes of the policy and the identified school has already been constructed. Options have not been appraised where the site allocation has removed developments which have been implemented, as the effects will have already been realised.	Leave site allocation unchanged  <b>Amend site allocation to remove reference to requirement for a primary school and remove the school area from the site allocation map.</b>
<b>SA1.9 Bartrip Street South</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	

Section 11 – Sub Area 2 North Stratford and Eton Manor			
2.1 Housing typologies	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
2.2 Leyton Road	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
2.4 Local Centres and non-residential uses	The Policy has been amended to extend the Local Centre boundary and outline designations for primary frontages.	Reassessment not required. The Local Centre has been established at East Village and the effects have been realised. The primary purpose of the Local Centre has remained the same.	
SA2.1 Chobham	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
SA2.2 East Village	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
SA2.3 Chobham Manor	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
SA2.4 Chobham Farm North	This is a new site allocation to the north of Liberty Bridge Road. The site is family-focused and includes amenity space and a link to the Chobham Farm public open space. The site allocation policy text includes development principles which aim to minimise impacts from the railway and to provide a safe pedestrian crossing over Henrietta Street.	This is a new site allocation which will require assessment under this IIA.	
Section 12 Sub Area 3 Central and Southern Queen Elizabeth Olympic Park			
3.X Metropolitan Centre	This is a new Policy which covers the further expansion of the Metropolitan Centre and how proposals will contribute towards the International Centre designation. The Policy outlines how Stratford will be promoted as a future International Centre by directive large-scale town centre uses, supporting growth in office floorspace, supporting Stratford Waterfront as a cultural and education district, improving retail requirements and supporting cultural and night-time economy uses.	This is a new policy which will require assessment under this IIA.	
3.1 Stratford High Street Policy Area	Minor change to Policy text to bring it in line with Policy BN.10 regarding development heights. The supporting text additionally references the cultural and night-time economy.	Assessment required to ensure the IIA fully considered the night-time and cultural economy as part of the assessment.	
3.2 Improving connections around central Stratford	No change to the Policy wording	Reassessment not required as Policy has remained the same.	
SA3.1 Stratford Town Centre West	This site allocation policy has been amended to reflect the NPPF requirements for viability assessment conclusions. It makes reference to the amount of additional homes and the percentage of affordable homes. It also includes additional aspects to be included in the development parcels.	Assessment required to ensure the new home yield and percentages of affordable homes are considered within the IIA.	
SA3.2 Stratford Waterfront East	This site allocation policy has been amended to reflect the NPPF requirements for viability assessment conclusions. It makes reference to the amount of additional homes and the percentage of affordable homes.	Assessment required to ensure the new home yield and percentages of affordable homes are considered within the IIA.	
SA3.3 Stratford Waterfront West	This site allocation policy has been amended to reflect the NPPF requirements for viability assessment conclusions. It makes reference to the amount of additional homes and the percentage of affordable homes.	Assessment required to ensure the new home yield and percentages of affordable homes are considered within the IIA.	
SA3.4 Greater Carpenters District	This site allocation policy has been amended to reflect the NPPF requirements for viability assessment conclusions. It makes reference to the amount of additional homes and the percentage of affordable homes.	Assessment required to ensure the new home yield and percentages of affordable homes are considered within the IIA.	

<b>SA3.5 Bridgewater Road</b>	This site allocation policy has been amended to reflect the NPPF requirements for viability assessment conclusions. It makes reference to the amount of additional homes and the percentage of affordable homes.	Assessment required to ensure the new home yield and percentages of affordable homes are considered within the IIA.	
<b>SA3.6 Rick Roberts Way</b>	This site allocation policy has been amended to reflect the NPPF requirements for viability assessment conclusions. It makes reference to the amount of additional homes and the percentage of affordable homes.	Assessment required to ensure the new home yield and percentages of affordable homes are considered within the IIA.	
<b>Section 13 – Sub Area 4 Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads</b>			
<b>4.1 A potential District Centre</b>	Minor updates to references.	Reassessment not required as Policy has remained the same.	
<b>4.2 Bringing forward new connections to serve new development</b>	Removal of delivery of a cycle superhighway route along Stratford High Street.	Assessment required to ensure the Policy is assessed without the provision of a superhighway.	
<b>4.3 Station improvements</b>	Minor change to text.	Reassessment not required as Policy has broadly remained the same.	
<b>SA4.1 Bromley-by-Bow</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
<b>SA4.2 Sugar House Lane</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
<b>SA4.3 Pudding Mill</b>	No change to site allocation	Reassessment not required as the site allocation policy has stayed the same.	
<b>SA4.4 Three Mills</b>	This is a new site allocation which focuses on restoration and conservation of heritage buildings within the site, whilst updating facilities to ensure they are fit for purpose and maximise employment use. It ensures proposals set out how historic buildings will be conserved, include a range of uses and facilities, preserve/enhance existing employment use and contribute towards maintaining heritage buildings in the conservation area.	This is a new site allocation which will require assessment under this IIA.	
<b>SA4.5 Bow Goods Yards (Bow East and West)</b>	This is a new site allocation in an area of Strategic Industrial Land (SIL) providing protected freight rail head facilities, which presents opportunities for long-term intensification and development of associated uses. Consolidation and intensification of rail and industrial uses would present the opportunity in the long-term to release land at Bow East provided that it protects the long-term rail access and freight function of the area, provides at least the equivalent amount of SIL function capacity, increases overall job density, secures long-term provision of rail and transport infrastructure, does not impact surrounding highway infrastructure and demonstrates an acceptable relationship between rail and other SIL uses and any non-SIL uses proposed.	This is a new site allocation which will require assessment under this IIA.	

## Appendix C

### Appropriate Assessment report

London Legacy Development  
Corporation

**Local Plan Policy Amendments**

HRA Appropriate Assessment  
Report

REP/248753/2017-0020/002

Issue | November 2018

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 248753-00

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# 1 Introduction

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## 1.1 Purpose of this Report

Ove Arup & Partners Limited ('Arup') was appointed by the London Legacy Development Corporation (LLDC) to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of the updated policies within the LLDC Local Plan on Natura 2000 network and Ramsar sites. The HRA work undertaken to assess the updated policies of this Local Plan draws extensively, where appropriate, on the work undertaken in 2013 by Hyder Consulting.

This document aims to provide both a screening assessment and appropriate assessment of the updated policies of LLDC Local Plan which is explained in more detail in section 1.2 below. It is necessary to assess whether the plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on the European Sites because of the updated policies.

The HRA is required to evaluate the Likely Significant Effects (LSE) of the LLDC Local Plan on internationally important wildlife sites within the zone of influence, and determine if there are any relevant impact pathways to consider.

The objectives of this assessment are to:

- Identify any aspects of the local plan that would cause likely significant effects on Natura 2000 sites, otherwise known as European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects;
- Undertake Appropriate Assessment (AA) in order to rule out any significant effects, if any of the updated policies cannot be screened out as being unlikely to lead to significant effects; and
- To advise on appropriate policy mechanisms for delivering mitigation where such effects are identified as Appropriate Assessment stage.

## 1.2 HRA Screening

The London Legacy Development Corporation (LLDC) became a planning authority on 1st October 2012, with a full range of planning powers to continue the work of the Olympic Park Legacy Company. These include the development control functions previously undertaken by the boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest; Olympic Delivery Authority (ODA); and the planning functions of the London Thames Gateway Development Corporation (LTGDC). The LLDC is responsible for the Queen Elizabeth Olympic Park and areas beyond, including parts of the four London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest (Fig 1). As a planning authority, the LLDC has prepared a Local Plan (hereafter referred to as the LLDC Local Plan).

The LLDC Local Plan will play an important role in delivering social inclusion and convergence in one of the most deprived areas of the UK, transforming the Queen Elizabeth Park and its environs into sustainable and thriving neighbourhoods.

In 2013 Hyder Consulting were appointed by the LLDC to undertake a Sustainability Appraisal (SA) and a Habitats Regulations Assessment (HRA) of the Draft LLDC Local Plan. The Screening Reports were prepared by Hyder Consulting on behalf of LLDC as part of the statutory Habitats Regulations Assessment (HRA) of the Draft LLDC Local Plan in 2013.

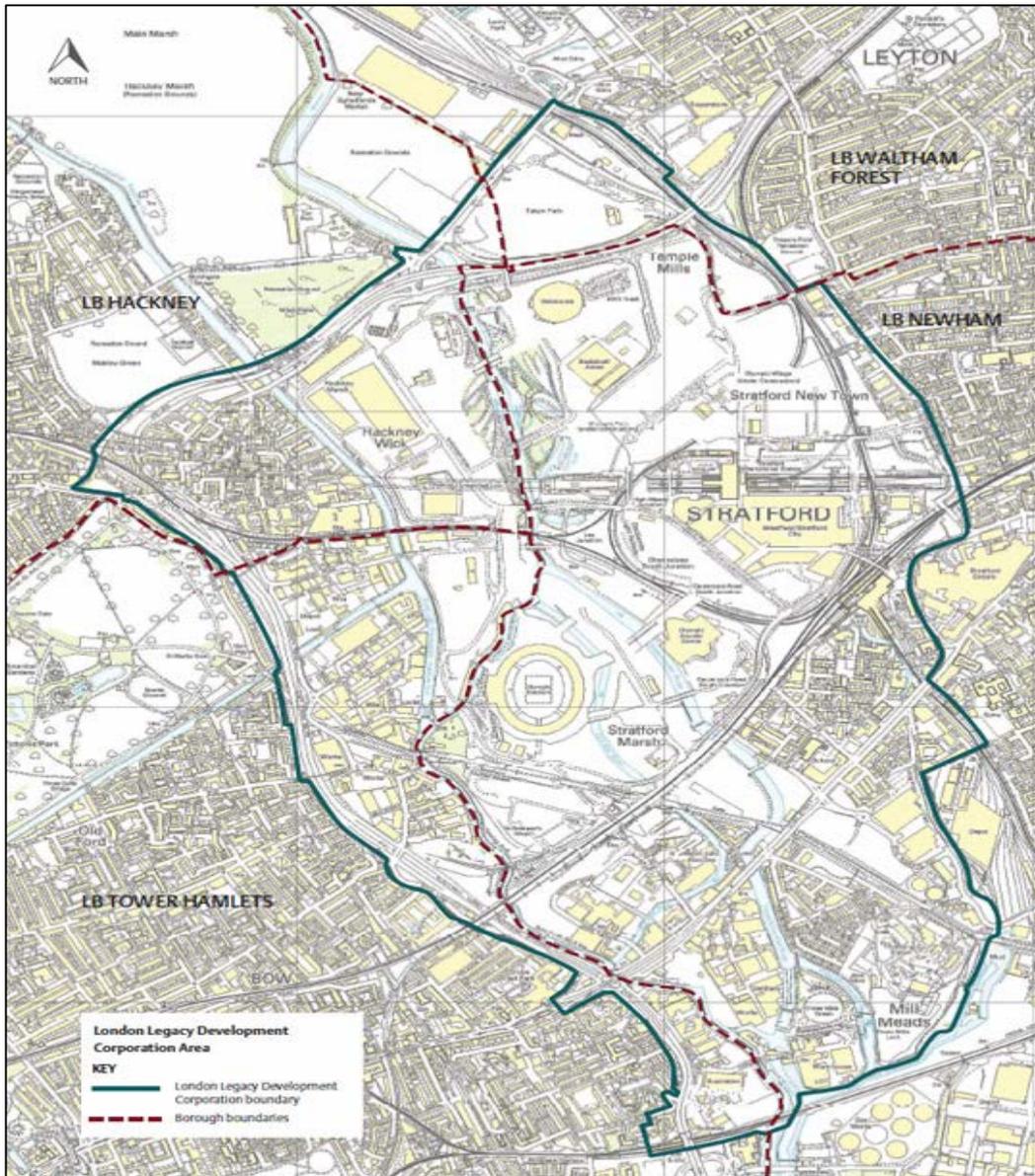
The HRA originally completed in 2013 concluded that the only policies where any potential exists for indirect effects on the European Sites are those where the development of site allocations will require project level HRA. It considered the potential implications of the plan for European Sites near to the borough boundary. It is important to note that none of the policies set out in the LLDC Local Plan would lead to direct impacts upon European sites.

The only policies where any potential exists for indirect effects on the European Sites are those that will need to be assessed at a lower tier (individual project level). However, it is considered that potential effects are very unlikely to be significant, given the distance between the European Sites and the developments likely to arise from the LLDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).

It was considered that these potential effects resulting from the development of individual sites, could readily be mitigated, both at the plan stage (through minor modifications to the wording of relevant policies) and at the project-specific HRA stage.

It was therefore concluded that, assuming the policies are strengthened further in line with the recommendations, the LLDC Local Plan is unlikely to have any significant effects on the European Sites identified, either alone or in-combination with other plans or projects. Therefore, as mentioned above any further Appropriate Assessment was not undertaken at the time for the now adopted Local Plan.

Figure 1: The LLDC Planning Area



However, in April the European Court of Justice (ECJ) ruled in the case of *People Over Wind and Sweetman v Coillte Teoranta* (Case 323/17) that in order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project on a European Site, it is not appropriate at the screening stage to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that European Site.

The ECJ considered that the fact that measures intended to avoid or reduce the harmful effects of a plan on protected sites are taken into consideration when determining whether to carry out an appropriate assessment “*presupposes that it is likely that the site is affected significantly and that, consequently, AA should be carried out*” (para 35). In such circumstances there is a need for “*full and precise analysis of measures capable of avoiding or reducing any significant effects*” (para 36).

A result of this ECJ ruling, the Planning Inspectorate has provided advice to local authorities relating to how these findings should be taken in to account. As such, the LLDC has opted to take a precautionary approach and undertake an appropriate assessment of the revised policies.

It identifies whether or not the updated policies within the Local Plan are likely to result in significant effects upon one or more Natura 2000 sites (also known as 'European Sites'), either alone or in-combination with other plans or programmes, and subsequently whether or not an Appropriate Assessment will be required. To gain a complete picture of the potential effects of the LLDC Local Plan on European Sites, this report should be read in conjunction with the Draft LLDC Local Plan Sustainability Appraisal.

### 1.3 Background to the Habitats Regulations Assessment

The requirements of the Habitats Directive (EC Directive 92/43/EEC on the Conservation of Habitats and Natural Fauna and Flora) are transposed into law in England and Wales by the Conservation of Habitats and Species Regulations 2017.

Under Article 6 of EC Directive 92/43/EEC (the Habitats Directive), an assessment is required where a plan or project may give rise to significant effects upon any European Sites. Within the LLDC boundary there are no European Sites; however, it is considered there are three European Sites that could potentially be affected by the Local Plan through an identified impact pathway.

European Sites are areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SAC) and candidate SACs, designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPA) and candidate SPAs, classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands). In addition, as a matter of Government policy sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites), as well as potential SACs and SPAs are also considered.

Paragraph 3 Article 6 of the Habitats Directive states that:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

Paragraph 4, Article 6 of the Habitats Directive states that:

*“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.”*

The overarching aim of HRA is to determine, in view of a site’s conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on the European Site. If the Screening (the first stage of the process, see Section 3 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on a site’s integrity.

## 1.4 Legislation and Guidance

This HRA Report has drawn upon the following legislation and guidance:

- The Conservation of Habitats and Species (Amendment) Regulations 2012;
- Tyldesley & Chapman (2013), The Habitats Regulations Assessment Handbook. DTA Publications. As updated.;
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents; and
- Draft Guidance for Plan Making Authorities in Wales - The Appraisal of Plans under the Habitats Directive. David Tyldesley and Associates for Countryside Council for Wales (CCW) Bangor (November 2009, revised April 2010 and September 2012).

## 2 The Local Plan and updated Policies

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### 2.1 Background

The Local Plan builds on previously adopted borough plans for the constituent parts of the LLDC area, and sets out the LLDC strategy for the sustainable development of its area as a whole. This includes the general amount, type and location of new development it considers could take place and the policies that applications for planning permission should conform to in order to meet these objectives.

The LLDC area is geographically well defined, bordered and divided by waterways, major roads and railway lines, bringing parts of four east London boroughs together (Hackney, Tower Hamlets, Newham and Waltham Forest). Policies within the Draft Revised Local Plan are currently being updated. As part of these updates, it is necessary to assess whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on the European Sites because of the updated policies.

### 2.2 Strategic Policies

The vision and objectives set out the overall direction of the Local Plan. The Strategic Policies implement this vision. The policies are set out under a number of headings as follows:

- Business, Jobs, Higher Education and Training;
- Housing and Neighbourhoods;
- Built and Natural Environment;
- Transport Infrastructure; and
- Sustainability.

### 2.3 Updated Policies within the LLDC Local Plan

The following policies and/or their supporting text have been updated in the Revised Local Plan:

#### **Section 4 – Developing business growth, jobs, higher education and training**

SP.1 Building a strong and diverse economy

Policy B.1 Location and maintenance of employment uses

Policy B.2 Thriving town, neighbourhood and local centres

Policy B.3 Creating vitality through interim uses

Policy B.4 Providing low-cost and managed workspaces

Policy B.5 Increasing local access to jobs, skills and employment training

## **Section 5 – Providing housing and neighbourhoods**

SP.2 Maximising housing and infrastructure provision within new neighbourhoods

H.1 Providing for and diversifying the housing mix

H.2 Affordable housing

H.3 Older Persons

H.4 Student Accommodation

H.5 Gypsy and travellers

H.6 Houses in Multiple Occupation

H.7 Shared living accommodation

H.8 Innovative housing models

## **Section 6 - Creating a high quality natural and built environment**

BN.1 Responding to place

BN.2 Creating distinctive waterway environments

BN.3 Maximising biodiversity

BN.4 Designing development

BN.5 Proposals for tall buildings

BN.6 Requiring Inclusive Design

BN.7 Protecting Metropolitan Open Land

BN.8 Improving local open space

BN.9 Maximising opportunities for play

BN.10 Protecting Key Views

BN.11 Air Quality

BN.12 Noise

BN.13 Protecting archaeological interest

BN.14 Improving the quality of land

BN.15 Designing residential extensions

BN.17 Conserving or enhancing heritage assets

## **Section 7 - Securing transport infrastructure to support growth**

SP.4 Planning and securing transport infrastructure to support growth and convergence

T.1 Strategic transport improvements

T.2 Transport improvements

T.4 Managing development and its transport impacts of promote sustainable transport choices, facilitate local connectivity and prioritise pedestrians and cyclists

T.5 Street network

T.8 Parking and parking standards in new development

T.9 Providing for pedestrians and cyclists

T.10 Using the waterways for transport

## **Section 8 - Creating a sustainable place to live and work**

SP.5 A Sustainable and healthy place to live and work

S.1 Health and wellbeing

S.2 Energy in new development

S.6 Increasing digital connectivity and safeguarding existing communications provision and enabling future infrastructure

S.7 Planning for waste

S.8 Waste reduction

S.9 Overheating and urban greening

S.10 Flood risk

S.11 Sustainable drainage measures and flood protection

S.12 Resilience, safety and security

## **Section 10 - Sub Area 1 Hackney Wick Station Area**

1.1 Managing change in Hackney Wick and Fish Island

SA1.1 Hackney Wick Station Area

SA1.2 Hamlet Industrial Estate

SA1.3 Hepscott Road

SA1.4 Neptune Wharf

SA1.5 East Wick and Here East

SA1.6 Sweetwater

## **Section 11 - Sub Area 2 North Stratford and Eton Manor**

2.3 Local Centres and non-residential uses

SA2.1 Chobham Farm

SA2.2 East Village

SA2.3 Chobham Manor

SA2.4 Chobham Farm North

## **Section 12 - Sub area 3 Central and Southern Queen Elizabeth Olympic Park 3.1 Metropolitan Centre**

3.1 Metropolitan Centre

3.2 Stratford High Street Policy Area

SA3.1 Stratford Town Centre West

SA3.2 Stratford Waterfront East

SA3.3 Stratford Waterfront West

SA3.4 Greater Carpenters District

SA3.5 Bridgewater Road

SA3.6 Rick Roberts Way

## **Section 13 – Sub Area 4 Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads**

4.1 A potential District Centre

4.2 Bringing forward new connections to serve new development

4.3 Station improvements

SA4.1 Bromley-by-Bow

SA4.2 Sugar House Lane

SA4. Pudding Mill Lane

SA4.4 Three Mills

SA4.5 Bow Goods Yards (Bow East and West)

## 3 The Habitats Regulation Assessment Process

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HRA is a step by step process which helps determine likely significant effect and (where appropriate) assess adverse impacts on the integrity of a European Site, examines alternative solutions, and provides justification for IROPI. Guidance describes a four stage process to HRA, this section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

### 3.1 Stages in HRA

The requirements of the Habitats Directive comprise four distinct stages:

1. Screening is the process which initially 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 may have a significant effect on the site's features (habitats and/or species). It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice (ECJ) case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be undertaken.
2. Appropriate Assessment is the detailed consideration of the impact upon the integrity of the European Site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the inclusion of mitigation measures to avoid or reduce any possible impacts. This is the final stage reached within this report.
3. Assessment of alternative solutions is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European Site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. Assessment where no alternative solutions exist and where adverse impacts remain. At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If this is the case, this stage also involves identification of compensatory measures needed to protect and maintain the overall coherence of the European Site network.

## 3.2 Approach to Screening

This Screening Report takes into account the requirements of the Habitats Regulations and relevant guidance as well as the recent European Court of Justice ruling in the case of *People Over Wind and Sweetman v Coillte Teoranta*<sup>1</sup>.

The following stages have been completed:

- Identification of all European Sites potentially affected (including those outside of the Local Plan area for which impact pathways have been identified);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
- A review of the policies which have the potential to affect the European Sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the policy, in line with Natural England guidance);
- A consideration of any impacts in combination with other plans or projects;

## 3.3 Definition of Significant Effects

A critical part of the HRA screening process is determining whether the proposals are likely to have a significant effect on European Sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance, and also its conservation objectives. A useful definition of significant effects is provided in Welsh planning guidance, which can be drawn upon in this case:

‘...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site’s conservation objectives’.

## 3.4 Consideration of In-Combination Effects

It is necessary for HRA to consider in-combination effects with other plans and projects that could act in-combination with the Local Plan to result in any likely significant effects on the European Sites identified. A list of plans and documents for review was provided within the London Legacy Development Corporation: Draft LLDC Local Plan Sustainability Appraisal and Habitats Regulations Assessment in 2014, which is still relevant for this assessment.

It should be noted that in-combination effects only require consideration where the plan or project being assessed has an impact, whether significant or not. A conclusion of ‘Zero Effects’ negates the possibility of in-combination effects.

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<sup>1</sup> <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

## 4 Identification of European Sites and Potential Impacts

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As part of the HRA, information has been gathered to establish;

1. European Sites within and outside the plan area potentially affected
2. Site characteristics and conservation objectives
3. Other relevant plans or projects.

Based on the information gathered, no European Sites are located within the LLDC area boundary. Therefore, no direct land-take from any European Sites is predicted as a result of plan implementation. However, European Sites outside of the boundary may be affected by activities undertaken within the LLDC area if they are connected through an impact pathway, for example, hydrological links or impacts upon air quality.

Table 1: European Sites that could be affected by the LLDC Local Plan

Name of Site	Status	Distance from LLDC Boundary
Lee Valley Special Protection Area	SPA	3.4km north west
Lee Valley Ramsar site	Ramsar	3.4km north west
Epping Forest Special Area of Conservation	SPA	2.9km north east

## 5 Local Plan Updated Policy Screening

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The LLDC Local Plan was adopted in 2015 and is the statutory Local Plan for the area. To ensure that it remains up-to-date, the Legacy Corporation has initiated the formal process of reviewing the Local Plan to respond to new evidence that is being prepared on key matters, as well as the changes that have occurred at local, London and national level. Stage 1 of the HRA process has been further broken down into two steps, which are outlined below.

### 5.1 Initial Screening of updated policies

The initial stage will eliminate those policies from the assessment that very clearly would not affect European Sites. The eliminated policies are defined by the following criteria:

- The policy itself will not lead to development (e.g. it relates to design or is not a land use planning policy);
- No development could occur through the policy alone, because it is implemented through subordinate policies that are more detailed and therefore more appropriate to assess for their effects on the European Site;
- There is no impact pathway to any of the European Sites identified; and/or
- The policy is intended to protect the natural environment, including biodiversity.

All other policies will be assessed through the detailed screening process below.

### 5.2 Detailed screening of updated policies

The detailed screening of the Local Plan policies in relation to the European Sites is presented in Table 2, below, and is based on the findings of the initial screening exercise and the assessment of potential impacts, as mentioned in Section 5.1. Policies have been selected for further screening on the basis that there may be potential impact pathways to the European Sites. This screening also includes categorisation of the potential effects in line with guidance. The screening of the updated LLDC Local Plan policies table 2 has identified that the policies depend entirely on how they are implemented in due course, through the development management process.

The detailed screening presented below identified that there were aspects of the revised policies that could lead to possible likely significant effects, assuming mitigation is not taken in to account. It is considered that all the policies should be given an assessment category of 'F', which is where there is uncertainty about the way in which aspects of a plan may be implemented. These policies have been taken forward to appropriate assessment to ensure that, when applied, mitigation and other associated policies would provide certainty about the way the policies are implemented. The assessment categories are outlined within the Sustainability Appraisal (SA) and a Habitats Regulations Assessment (HRA) of the Draft LLDC Local Plan completed in 2013.

Table 2: Detailed screening of the Local Plan policies

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category	Conclusion of Likely Significant Effects (LSE) at this stage
<p>Policy B.1 B.2, B.3, B.4. The policies guide the location of business development within the LLDC area and, as the impacts are considered to be of a similar type, they have been considered together. Level of specificity on the relocation of employment floorspace capacity by location has been updated.</p>	<p>Policies that promote development for employment and education could have an adverse effect on air quality as a result of increased traffic emissions. They could also contribute to increased water demands and therefore water abstraction.</p> <p>The probability of workers increasing recreational pressure on the European Sites is considered insignificant, given the distance between the Local Plan area and the sites, and the availability of alternative recreational space closer to the employment hubs.</p> <p>The policies aim to focus development for business into 'employment hubs' within the LLDC area as identified in the Local Plan (B.1, 2, 3 and 4).</p> <p>As the European Sites are several kilometres outside the Local Plan area, it is impossible to quantify the amount of air pollution that can be contributed to proposed development within the LLDC area. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the Local Plan area through minimising vehicle use and the focussing of proposed development. Associated demands on water supply will also be minimised (as far as a local authority can influence this) through the implementation of Policy IN3, which supports measures to reduce water demand.</p> <p>The policies above also aim to minimise any impacts of climate change on the European Sites as far as possible.</p>	<p>Land allocation for employment use is in line with the requirements of the London Plan, which has also been subject to an HRA process. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified European Sites.</p> <p>Core Strategies for the local boroughs that make up the LLDC area (Hackney, Tower Hamlets, Newham and Waltham Forest) have also been through the HRA process.</p> <p>All of these HRAs concluded that there would be no significant effect on European Sites either alone, or in-combination with, other plans and projects, with regard to air quality, or through an increase in water demand, by the implementation of the policies contained within the individual Core Strategies. Although it is acknowledged that many 'insignificant' impacts can in theory add up to a 'significant' impact, the LLDC area comprises only portions of the previous four London Boroughs, with a corresponding decrease in an already insignificant impact. The distance of the LLDC area to the European Sites also means that potential indirect impacts are reduced further.</p> <p>The Legacy Communities Scheme provides for a phased mixed-use development for land within the Queen Elizabeth Olympic Park, including employment space. It includes proposals on how to reduce energy and water use, maximise green infrastructure and promote the principles of sustainable development. All these factors should help reduce any potential indirect impacts on the European Sites several kilometres away, and therefore the in-combination effects when considered with other development proposals in the Local Plan area are judged to be insignificant.</p> <p>Finally, the policies and proposals contained within both the Mayor's Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on European Sites in the medium to long term.</p> <p>It is therefore concluded that the implementation of B.1, B.2, B.3, &amp; B.4 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction) Epping Forest SAC (from decreases in air quality)</p>	<p>F: Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European Sites</p>	<p>Potential LSE</p>
<p>Policy H.1, H.2, H4, H,7, H.8- To reflect new Housing Requirements Study in relation to housing size and mix</p>	<p>Policies that promote housing development could have an adverse effect on air quality as a result of increased traffic emissions. They could also contribute to increased water demands and therefore water abstraction. Furthermore, an increase in recreational pressure on European Sites could result due to the corresponding rise in population.</p> <p>Planning consent has already been given for approximately 82% of the total projected growth in the area. Housing delivery is to be</p>	<p>As with all London Boroughs, the LLDC Local Plan is directed by the London Plan on a range of housing policies. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified European Sites.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure) Epping Forest SAC (from decreases in air quality and</p>	<p>F: Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the</p>	<p>Potential LSE</p>

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category	Conclusion of Likely Significant Effects (LSE) at this stage
	<p>completed in stages, alongside necessary infrastructure, as detailed in the Infrastructure Delivery Plan.</p> <p>Policy S.2 sets out how developments will be expected to minimise carbon dioxide emissions, and policy BN.10 requires the incorporation of the highest standards of sustainability and design.</p> <p>In addition, other policies in the Local Plan, such as T8, support the development of public transport schemes, whilst T4 provides for provision for pedestrians and cyclists and T5 refers to the production of Travel Plans for new developments which actively promote public transport, cycling and walking. It is acknowledged within the Local Plan that much of the public transport improvements are already underway.</p> <p>Policy BN.11 seeks to ensure that there will be no worsening of air quality within the LLDC area through the design and construction of proposed developments.</p> <p>Policy SP.5 supports measures to reduce water demand and use and to extend the non-potable supply network that has been installed in the Queen Elizabeth Olympic Park.</p> <p>Policy BN.3 aims to achieve integration between the natural and built environment by maximising the provision of natural habitat. BN.6 aims to contribute to the enhancement and management of green infrastructure within the Local Plan area. Policies BN.9, BN.10 and BN.11 also relate Other policies within the local plan aim to reduce this risk.</p> <p>The policies above also aim to minimise any impacts of climate change on the European Sites as far as possible.</p>	<p>Core Strategies for the local boroughs that make up the LLDC area (Hackney, Tower Hamlets, Newham and Waltham Forest) have also been through the HRA process.</p> <p>All of these HRAs concluded that there would be no significant effect on European Sites either alone, or in-combination with, other plans and projects, with regard to air quality, or through an increase in water demand, by the implementation of the policies contained within the individual Core Strategies. Although it is acknowledged that many ‘insignificant’ impacts can in theory add up to a ‘significant’ impact, the LLDC area comprises only portions of the previous four London Boroughs, with a corresponding decrease in an already insignificant impact. The distance of the LLDC area to the European Sites also means that potential indirect impacts are reduced further.</p> <p>Finally, the policies and proposals contained within both the Mayor’s Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on European Sites in the medium to long term.</p> <p>It is therefore concluded that the implementation of Policy H1 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar in-combination with other plans or projects.</p>	<p>increases in recreational pressure)</p>	<p>proposal could possibly have a significant effect on a European site.</p>	
<p>Sub Area 1: Hackney Wick and Fish Island SA1.1 Hackney Wick Station Area SA1.2 Hamlet Industrial Estate SA1.3: Hepscott Road SA1.4 Neptune Wharf SA1.5 East Wick and Here East SA1.6 Sweetwater SA1.7 Bartrip Street South</p>	<p>These site allocations have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p> <p>An assessment of potential effects needs to consider the same issues as that for policies B.1-4 and H1.-H.8.</p> <p>With respect to recreational pressure, the risk that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations is low. Particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure, and the importance of enhancing biodiversity within the Plan lifetime.</p>	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the B.1-4 and Housing policies (H.1-H.8), as the site allocations form part of the total allocations under these policies.</p> <p>It is therefore concluded that implementation of Policies SA1.1; 1.2; 1.3; 1.4; 1.5; 1.6 and 1.7 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure). Epping Forest SAC (from decreases in air quality and increases in recreational pressure)</p>	<p>F: Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European Site</p>	<p>Potential LSE</p>
<p>Sub Area 2: North Stratford and Eton Manor SA2.1 Chobham SA2.2 East Village</p>	<p>The updated site allocations (SA2.2 and SA2.3) has the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p>	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the policies B.1-4, and H.1-H.8, as the site allocations form part of the total allocations under these policies.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure).</p>	<p>F: Policies depend entirely on how they are implemented in due course, through the development</p>	<p>Potential LSE</p>

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category	Conclusion of Likely Significant Effects (LSE) at this stage
SA2.3 Chobham Manor SA2.4 Chobham Farm North	An assessment of potential effects needs to consider the same issues as that for policies B.1-4 and H1.-H.8. With respect to recreational pressure, the risk that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations is low. Particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure, and the importance of enhancing biodiversity within the Plan lifetime.	It is therefore concluded that development of the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.	Epping Forest SAC (from decreases in air quality and increases in recreational pressure).	management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European Site.	
Sub Area 3: Central Stratford and the Southern Queen Elizabeth Olympic Park Policy 3.1 concerns proposals for a Metropolitan Centre and Policy 3.2 for Stratford High Street, in compliance with policies. The following policies deal with separate site allocations: SA3.1 Stratford Town Centre West SA3.2 Stratford Waterfront East SA3.3 Stratford Waterfront West SA3.4 Greater Carpenters District SA3.5 Bridgewater Road SA3.6 Rick Roberts Way	These site allocations have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development. An assessment of potential effects needs to consider the same issues as that for policies B.1-4 and H1.-H.8. The policies and proposals that actively encourage the use of public transport, and minimise water use and air pollution within the Local Plan area, should minimise any adverse impact on European Sites that are outside the Local Plan area and help reduce the impacts of climate change. With respect to recreational pressure, the risk that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations is low. Particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure, and the importance of enhancing biodiversity within the Plan lifetime.	The assessment of potential in-combination effects through the implementation of this policy is the same as for the B.1-4 and Housing policies (H.1-H.8), as the site allocations form part of the total allocations under these policies. It is therefore concluded that implementation of Policies SA3.1, 3.2, 3.3, 3.4, 3.5 & 3.6 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar in-combination with other plans or projects.	Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure). Epping Forest SAC (from decreases in air quality and increases in recreational pressure)	F: Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European Site	Potential LSE
Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads SA4.4 Three Mills SA4.5 Bow Goods Yards (Bow East and West) SA4.1 Bromley-by-Bow SA4.2 Sugar House Lane SA4.3 Pudding Mill SA4.4 Three Mills SA4.5 Bow Goods Yards (Bow East and West)	Policy SA4.4 is a new site allocation which focuses on restoration and conservation of heritage buildings within the site, whilst updating facilities to ensure they are fit for purpose and maximise employment use. Policy SA.4.5 is a new site allocation which has the potential to indirectly affect European Sites through the construction and operation of protected freight rail head facilities. An assessment of potential effects for both new site allocations needs to consider the same issues as that for the B policies and the Housing policies. Consolidation and intensification of rail and industrial uses would present the opportunity in the long-term to release land at Bow East, provided that it:	The assessment of potential in-combination effects through the implementation of this policy is the same as for the B.1-4 and Housing policies (H.1-H.8), as the site allocation of this policy form part of the total allocations under these policies. It is therefore concluded that implementation of Policy SA4.5 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.	Lee Valley SPA/Ramsar (from increased water abstraction). Epping Forest SAC (from decreases in air quality)	F: Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European Site	Potential LSE

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category	Conclusion of Likely Significant Effects (LSE) at this stage
	<ul style="list-style-type: none"> <li>• protects the long-term rail access and freight function of the area</li> <li>• provides at least the equivalent amount of SIL function capacity</li> <li>• increases overall job density</li> <li>• secures long-term provision of rail and transport infrastructure</li> <li>• does not impact surrounding highway infrastructure</li> <li>• demonstrates an acceptable relationship between rail and other SIL uses and any non-SIL uses proposed.</li> </ul> <p>As for the assessment of B.1-4 and Housing policies, policies and proposals that actively encourage the use of public transport, and minimise water use and air pollution within the Local Plan area, should minimise any adverse impact on European Sites that are outside the Local Plan area and help reduce the impacts of climate change.</p>				

## 6 Appropriate Assessment

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Stage 2 of the HRA process provides a detailed assessment of those revised policies, which were taken forward to detail screening and found to have the potential for resulting in likely significant effects. In order to further assess whether mitigation avoids these likely effects, the favourable conservation status (FCS) of the qualifying features of the European Sites, current site conditions and any threats or vulnerabilities have been taken into consideration.

### 6.1 Characteristics of European Site

#### 6.1.1 Lee Valley SPA and Ramsar

##### 6.1.1.1 Site Characteristics

The Lee Valley SPA and Ramsar is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons, and former gravel pits that support a range of man-made, semi-natural, and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular gadwall (*Anas strepera*) and shoveler (*A. clypeata*), which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering bittern (*Botaurus stellaris*).

The Lee Valley SPA/Ramsar consists of four Sites of Special Scientific Interest (SSSIs) including: Turnford and Cheshunt Pits SSSI, Rye Meads SSSI, Amwell Quarry SSSI, and Walthamstow Reservoirs SSSI. Of these sites, Walthamstow Reservoirs SSSI lies within the London Boroughs area, Turnford and Cheshunt Pits SSSI lies within the Hertfordshire/Essex border, and the remainder lie within Hertfordshire. Walthamstow Reservoirs SSSI is the closest component of the Lee Valley SPA/Ramsar site, at a distance of 3.4km north-west from the LLDC Local Plan boundary.

##### 6.1.1.2 Lee Valley SPA

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

- Over winter:
  - Bittern *Botaurus stellaris*, 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

- Over winter:
  - Gadwall *Anas strepera*, 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
  - Shoveler *Anas clypeata*, 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)

### 6.1.1.3 Lee Valley Ramsar

With respect to the Ramsar designation, the Lee Valley is designated as it qualifies under Criteria 2 and 6, supporting species of international importance.

Ramsar Criterion 2 (supporting vulnerable, endangered, or critically endangered species or threatened ecological communities):

- The site supports the nationally scarce plant species whorled water-milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Ramsar Criterion 6 (regularly supporting 1% of the individuals in a population of one species or subspecies of waterbird):

- Species with peak counts in spring/autumn:
  - Shoveler (NW & C Europe) 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3).
- Species with peak counts in winter:
  - Gadwall (NW Europe) 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3).

### 6.1.1.4 Conservation Objectives for the Lee Valley SPA

The Conservation Objectives for the Lee Valley SPA, as identified by Natural England, are listed below.

- Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features (see below), ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.
- Subject to natural change, to maintain or restore:
  - The extent and distribution of the habitats of the qualifying features;
  - The structure and function of the habitats of the qualifying features;
  - The supporting processes on which the habitats of the qualifying features rely;
  - The populations of the qualifying features; and
  - The distribution of the qualifying features within the site.

### 6.1.1.5 Conservation Status and Vulnerability of the Lee Valley SPA/Ramsar

Amwell Quarry SSSI, Rye Meads SSSI, and Turnford and Cheshunt Pits SSSI were all considered to have 100% of their area in favourable condition (i.e. meeting their conservation objectives but with scope for enhancements). Walthamstow Reservoirs SSSI was reported to have 100% of its area in an unfavourable but recovering condition.

Lee Valley SPA is reported to be vulnerable to two main influences: discharge of waste and human recreation. Eutrophication exists in areas of the SPA as a result of a number of influences, including: sewage outfalls, surface runoff, and ground water pollution. Human disturbance of the European Site through recreation causes disturbance of wintering bird populations, although zonation of the site has regulated this disturbance. To a lesser extent, there is also pressure from public demand for water supply during periods of drought.

### 6.1.2 Epping Forest SAC

Epping Forest SAC covers an area of 1,605ha within Essex and parts of east London, with 70% of the site comprising broadleaved deciduous woodland. Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Its semi-natural woodland is particularly extensive, forming one of the largest coherent blocks in the country. Most of the woodland is characterised over-mature pollards. Its long history of pollarding, and resultant large number of veteran trees, has ensured that the site is also rich in fungi and dead-wood invertebrates, particularly the stag beetle (*Lucanus cervus*), for which the site is one of its major strongholds. Epping Forest also includes a variety of unimproved acid grasslands, which have become uncommon elsewhere in Essex and the London area.

Epping Forest is underpinned by one SSSI, Epping Forest SSSI. The SAC is located 2.9km from the LLDC Local Plan boundary.

#### 6.1.2.1 Qualifying Features of Epping Forest SAC

Annex I habitats that are a primary reason for selection of this site:

- Beech forests on acid soils with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion roburi-petraeae* or *Ilici-Fagenion*)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Northern Atlantic wet heaths with *Erica tetralix*; and
- European dry heaths.

Annex II species that are a primary reason for selection of this site:

- Stag beetle

### 6.1.2.2 Conservation Objectives for Epping Forest SAC

The Conservation Objectives for the Epping Forest SAC, as specified by Natural England, are listed below.

- Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.
- Subject to natural change, to maintain or restore:
  - The extent and distribution of qualifying natural habitats and habitats of qualifying species;
  - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
  - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
  - The populations of qualifying species; and
  - The distribution of qualifying species within the site.

### 6.1.2.3 Conservation Status and Vulnerability of Epping Forest SAC

83.64% of Epping Forest SSSI is considered to be in favourable (or unfavourable but recovering) condition, with 14.53% considered to be unfavourable but with no change and 1.83% in unfavourable condition and declining. The primary reason for the unfavourable and declining condition at the site is believed to be air pollution, in particular the effects of excessive levels of oxides of nitrogen and other pollutants, and the related deposition of acidity and of nitrogen.

Absence of historic pollarding practices and the presence of atmospheric pollutants from the surrounding urban area are considered to be responsible for the decline in lichen and moss populations at the site. Introduced management regimes are helping to reverse the decline. Epping Forest SAC is also subject to a comprehensive management plan, which is designed to improve the habitats for the Annex II species for which the site is designated.

## 6.2 Assessment of effects

### 6.2.1 Water quality and abstraction

The revised policies outlined in section 2 of this report could affect water quality and abstraction. However demands on water supply will be minimised (as far as a local authority can influence this) through the implementation of Policy IN3, which supports measures to reduce water demand. Policy SP.5 supports measures to reduce water demand and use and to extend the non-potable supply network that has been installed in the Queen Elizabeth Olympic Park. Finally, the policies and proposals contained within the Mayor's Draft Water Resource Management

promote the improvement of water resource management will also help reduce any adverse impacts on European Sites in the medium to long term.

Despite the policies for the reduction of water demand, it cannot be concluded with confidence at the plan stage that there will not be proposals brought forwards under the Local Plan that do not result in effects on either water quality or increased abstraction. Therefore, taking a precautionary approach, it is considered that there is the potential for the Local Plan to affect the ability of the Lee Valley SPA and Ramsar Site to achieve its conservation objectives.

### **6.2.2 Air Quality**

The revised policies outlined in section 2 of this report could have an effect on air quality as a result of increased traffic volumes and the resulting emissions. It is difficult to predict the potential increase in emissions due to both the distance between the Local Plan area and the European Sites, and the potential changes in vehicle technology over the duration of the Plan. In addition, other policies in the Local Plan, such as T8, support the development of public transport schemes, whilst T4 provides for provision for pedestrians and cyclists and T5 refers to the production of Travel Plans for new developments which actively promote public transport, cycling and walking. It is acknowledged within the Local Plan that much of the public transport improvements are already underway. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the Local Plan area through minimising vehicle use and the focussing of proposed development. Policy S.2 sets out how developments will be expected to minimise carbon dioxide emissions, and policy S.4 requires the incorporation of the highest standards of sustainability and design.

Despite the potentially beneficial contributions of some of the policies within the Plan, it cannot be rule out that the effects of air quality impact will not continue to affect the status of habitats within the Epping Forest SAC.

### **6.2.3 Species disturbance and land take**

None of the policies set out in the emerging LLDC Local Plan were assessed as being likely to lead to direct impacts upon species features of European Sites as the LLDC planning boundary does not overlap with any European Site. There is also not considered to be a likely effect on species present due to the distance from the European Sites as well as the type of activities outlined within he updated policies.

It is therefore concluded that the LLDC Local Plan will not give rise to adverse effects on the integrity of the Europeans in terms of their mobile species features.

## **6.3 Mitigation Measures**

To reduce the potential for adverse effects on the integrity of European Sites, it is recommended that the following mitigation measure is implemented as part of the development management process:

- Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where:
  - The proposed development involves or requires the abstraction of water from the Lee Valley; and / or
  - An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.

## 6.4 Residual Assessment

With the above controls in place it is considered that the LLDC Local Plan will not give rise to any adverse effects on the integrity of European Sites, as any applications that were likely to give rise to such effects would be prevented from obtaining planning consent through the provisions of the Habitats Regulations.

Table 2: Integrity of Site Checklist

<b>Conservation Objectives (Does the project have the potential to...)</b>	<b>Lee Valley Special Protection Area (SPA)</b>	<b>Lee Valley Ramsar site</b>	<b>Epping Forest Special Area of Conservation (SAC)</b>
Cause delays in progress towards achieving the conservation objectives of the site?	No	No	No
Interrupt progress towards achieving the conservation objectives of the site?	No	No	No
Disrupt those factors that help to maintain the favourable conditions of the site?	No	No	No
Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site?	No	No	No
Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem?	No	No	No
Change the dynamics of the relationships (between, for example, soil and water or plants and animals) that define the structure and/or function of the site?	No	No	No
Interfere with predicted or expected natural changes to the site (such as water dynamics or chemical composition)?	No	No	No
Reduce the area of key habitats?	No	No	No
Reduce the population of key species?	No	No	No
Change the balance between key species?	No	No	No
Reduce the diversity of the site?	No	No	No
Result in disturbance that could affect population size or density of the balance between key species?	No	No	No
Result in fragmentation?	No	No	No
Result in loss or reduction of key features (e.g. tree cover, tidal exposure, annual flooding, etc)?	No	No	No

## 7 Overall HRA conclusion

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### 7.1 In-combination effects

The Appropriate Assessment detailed screening of the updated LLDC Local Plan policies has identified that the updated policies will have no significant effects on the features of the Lee Valley SPA/Ramsar or Epping Forest SAC, either on their own or in-combination with other plans or projects.

### 7.2 Conclusion

This Appropriate Assessment and screening of the updated LLDC Local Plan policies has considered the potential implications of the plan for European Sites near to the borough boundary. It is important to note that none of the updated policies set out in the LLDC Local Plan would lead to direct impacts upon European Sites.

None of the updated policies require assessment at a lower tier (individual project level). The significance of the potential effects was assessed taking in to account plainly established uncontroversial standard construction industry practices that are require by current UK legislation.

The ‘Integrity of Site Checklist’ provided in Table 2 was used to ascertain whether the revised policies would adversely affect the integrity of any of the sites considered in the appropriate assessment. Best professional judgement was used to answer these questions, supported by the information obtained as part of the appropriate assessment. As there are no positive responses to any of the questions listed in Table 2, it is considered that the revised policies would not adversely affect the integrity of any of the sites.

Therefore, for the purposes of Regulation 6 of the Conservation of Habitats and Species Regulations 2017, it is concluded that there would not be an adverse effect on the integrity of the European Sites considered in this assessment. As such, it is not proposed to progress the assessment to stage 3.

## Appendix D

### Appraisal of non-selected options

# 1 Option 2b of Policy B.1 Location and maintenance of employment uses

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## 1.1 Option appraisal

**Option 2b** - Update to reflect new approach to industrial land within the draft London Plan to protect industrial floorspace capacity with a unified approach to employment clusters

## 1.2 Assessment

The policy aims to safe guard employment land to enable residents access to employment opportunities. It also ensures that existing businesses are accommodated for. Strengthening economic opportunities can encourage different groups to access local opportunities, including young people, people from BME backgrounds and people with disabilities, therefore also contributing to reducing poverty and social inclusion. This also encourages residents to develop a sense of ownership if employment and local business opportunities are open to all.

Evidence shows that good quality employment is positive for mental wellbeing and leads to better health outcomes, as well as reducing poverty. Greater access to clustered employment sites and a general mix of employment types will therefore positively contribute to reducing health inequalities and improving wellbeing.

The policy takes a proactive approach to residential development, supporting well-designed proposals for intensification, consolidation and co-location of uses. This includes the mitigation of adverse impacts on noise and air quality, which could help to enhance amenity for local communities. This could also contribute to improvements in London's overall housing supply by releasing land for future development. The policy also supports the re-use of buildings of value/heritage assets, in line with market demand and viability. This could facilitate the delivery of house building that meets the needs of the LLDC Planning Area.

The policy supports sustainable land use through the safeguarding of sites for specific land uses. It allocates land for Strategic Industrial Locations (SIL), Local SIL and other industrial sites in existing industrial areas and supporting intensification and an increase in job density in these areas.

The policy also supports good design as it specifically refers to the role of design in the provision of new employment spaces. The retention of industrial areas and promotion of multiple industries will help to conserve and enhance the character of the townscape and retain the spatial diversity of the communities. Design is considered in detail in terms of sustainability. This policy will directly improve the wider built environment and create a sense of vibrancy. Regeneration can also improve feelings of safety and security in an area.

The policy supports the protection and enhancement of employment space within the LLDC Planning Area, supporting both SMEs and larger strategic industries. This will

promote economic growth and diversity in the area, underpinning the economic competitiveness of the area. The policy encourages the flexible provision of employment land and floorspace to meet the needs of a wide range of end users. This is beneficial in terms of encouraging business start-ups and supporting the growth of businesses, including SMEs, social enterprises and the voluntary/community sectors. Flexible provision may also support diversification by ensuring that locations are appealing to as wide a range of users as possible. Any growth in economic activity, including the development/enhancement of employment clusters, creates additional opportunities for residents to access employment.

The construction of employment units will also create economic benefits through construction employment, as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Ensuring the provision of flexible floorspace and the reuse of heritage assets can help to prolong the useful lifetime of built infrastructure, and avoid the need for additional construction, demolition and significant refurbishment. Subsequently, this can reduce construction, demolition and excavation waste. The co-location of businesses can also provide an opportunity for businesses to share resources. In certain cases, the surplus material or waste of one business can become the resource of another business, creating further resource benefits.

The policy text states that proposals, including conversions, shall be considered against the proximity of incompatible uses to the existing and proposed use. This is in keeping with the agent of change principle.

## 1.3 HRA Implications

No Likely significant effect at this stage.

Table 1. Policy B.1 Location and maintenance of employment uses

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				+	++			n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	O	O
Medium Term		+				++	++			n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	+	O
Long Term		+				++	++			n/a	+	+	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a	++	O
Direct / Indirect		I				D	D			n/a	D	D	n/a	n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a	D	D
Temporary / Permanent		P				P	P			n/a	P/T	P	n/a	n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a	P	P
Local / Greater London / Wider Region / Global		L/G L				GL	L			n/a	L/G L/ WR	L/G L	n/a	n/a	n/a	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a	L	L
<b>EQIA</b>																									
Short Term	+	+	+	n/a	+	++	+	+		n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	+	+	+	n/a	+	++	+	+		n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	+	+	+	n/a	+	++	+	+		n/a	+	+	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I	I	I	n/a	D	I	I	D		n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P		n/a	P/T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/ GL	L/G L	L/G L	n/a	L/G L	L	L	L/G L		n/a	L/G L/ WR	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																									
Short Term	+		+		?		+			n/a	n/a				n/a	n/a									
Medium Term	+		+		?		+			n/a	n/a				n/a	n/a									
Long Term	+		+		?		+			n/a	n/a				n/a	n/a									
Direct / Indirect	I		I		I		I			n/a	n/a				n/a	n/a									
Temporary / Permanent	P		P		P		P			n/a	n/a				n/a	n/a									
Local / Greater London / Wider Region / Global	L/ GL		L/G L		L		L			n/a	n/a				n/a	n/a									
<b>CSIA</b>																									
Short Term				n/a			+			n/a															
Medium Term				n/a			+			n/a															
Long Term				n/a			+			n/a															
Direct / Indirect				n/a			I			n/a															
Temporary / Permanent				n/a			P			n/a															
Local / Greater London / Wider Region / Global				n/a			L			n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 2 Option 1a of Policy H.1 Providing for and diversifying the housing mix

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### 2.1 Option appraisal

**Option 1a** - to update from Housing Requirements Study (HRS) evidence requirements on housing mix requirements.

### 2.2 Assessment

The policy supports the diversification of housing provision by securing an appropriate mix of accommodation types to meet identified needs set out in the 2018 HRS. A mix of accommodation promotes mixed and inclusive communities. This policy is likely to increase the range and affordability of housing, and promote accessible and adaptable homes. The provision of inclusive, well-designed housing is likely to also play a role in reducing homelessness and overcrowding, and contribute to a range of positive health outcomes.

The policy supports sustainable land use by promoting regeneration, encouraged through development on brownfield land, which can provide benefits for existing communities in terms of social infrastructure provision.

The policy supports a mix of housing units, including family housing. The supporting texts goes further to suggest that family housing could be designed to support home working practices. The facilitation of home working may help to deliver economic growth, diversify the economy, create opportunities for unemployed, encourage business start-ups/SMEs and support social enterprise, voluntary and community sectors.

The construction of additional housing will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Although the policy does not directly address supporting infrastructure, the consideration of existing and future infrastructure requirements could be considered as part of the evidence base to support appropriate housing delivery. The limited consideration of infrastructure could adversely impact on housing delivery, and result in unsustainable growth.

The policy outlines that the proposal is in accordance with all relevant policies of the Local Plan and this includes avoiding detrimental impacts on the historic environment

and heritage assets. However, there are not any conditions in the policy that support the conservation and enhancement of the historic environment.

In referring to the brownfield register to achieve housing need, the policy promotes the redevelopment of brownfield sites at a strategic level, thereby enhancing the site through remediation. Redevelopment of brownfield sites will need to address ground contamination risks to human health. Appropriate remediation and mitigation of risks will lead to an improvement in the site condition.

The policy relates to diversifying the range of housing provision. The supporting text requires justification for the need for the development where it is considered that a proposal could harm the residential amenity, character or function of the area. This does not explicitly refer to noise however it ensures that where there is potential to harm amenity it is justified.

### 2.3 HRA Implications

No Likely Significant Effect (LSE) at this stage.

Policy H.1 Providing for and diversifying the housing mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		n/a	+	O	n/a	O	+	n/a	O								
Medium Term		++				+	+		n/a	+	-	n/a	O	+	n/a	O								
Long Term		++				+	+		n/a	+	-	n/a	O	+	n/a	O								
Direct / Indirect		D				D	I		n/a	D	D	n/a	I	D	n/a	D								
Temporary / Permanent		P				P	P		n/a	P/T	P	n/a	P	P	n/a	P								
Local / Greater London / Wider Region / Global		L				GL	GL		n/a	L	L/G L	n/a	L/ GL	L	n/a	L								
<b>EQIA</b>																								
Short Term	++	++	++	n/a	+	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	++	n/a	++	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Long Term	++	++	++	n/a	++	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P/T	P	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/G L/ WR	L	L	L	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a	n/a	n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		+		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Medium Term	+		+		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Long Term	+		+		++		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Direct / Indirect	D		D		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	D		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	P		n/a
Local / Greater London / Wider Region / Global	L		L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L/ GL	L		n/a
<b>CSIA</b>																								
Short Term				?			+		n/a															
Medium Term				?			+		n/a															
Long Term				?			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L			L		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

### 3 Option 1b of Policy H.1 Providing for and diversifying the housing mix

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#### 3.1 Option appraisal

**Option 1b** – as 1a plus London Plan direction for housing delivery including small sites and reference to design codes.

#### 3.2 Assessment

The policy supports the diversification of housing provision by securing an appropriate mix of accommodation types to meet identified needs set out in the 2018 HRS. A mix of accommodation promotes mixed and inclusive communities. This policy is likely to increase the range and affordability of housing, and promote accessible and adaptable homes. The provision of inclusive, well-designed housing is likely to also play a role in reducing homelessness and overcrowding, and contribute to a range of positive health outcomes.

The policy supports sustainable land use by promoting regeneration, encouraged through development on brownfield land, which can provide benefits for existing communities in terms of social infrastructure provision. The inclusion of small sites in line with the Draft New London Plan increases the land available for development.

The policy supports a mix of housing units, including family housing. The supporting texts goes further to suggest that family housing could be designed to support home working practices. The facilitation of home working may help to deliver economic growth, diversify the economy, create opportunities for unemployed, encourage business start-ups/SMEs and support social enterprise, voluntary and community sectors.

The construction of additional housing will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. The addition of small sites also increases opportunities for smaller construction firms to contribute to development in the LLDC Planning Area. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Although the policy does not directly address supporting infrastructure, the consideration of existing and future infrastructure requirements could be considered as part of the evidence base to support appropriate housing delivery. The limited consideration of infrastructure could adversely impact on housing delivery, and result in unsustainable growth.

The policy outlines that the proposal is in accordance with all relevant policies of the Local Plan and this includes avoiding detrimental impacts on the historic environment

and heritage assets. However, there are not any conditions in the policy that support the conservation and enhancement of the historic environment.

In referring to the brownfield register to achieve housing need, the policy promotes the redevelopment of brownfield sites at a strategic level, thereby enhancing the site through remediation. Redevelopment of brownfield sites will need to address ground contamination risks to human health. Appropriate remediation and mitigation of risks will lead to an improvement in the site condition.

The policy relates to diversifying the range of housing provision. The supporting text requires justification for the need for the development where it is considered that a proposal could harm the residential amenity, character or function of the area. This does not explicitly refer to noise however it ensures that where there is potential to harm amenity it is justified.

#### 3.3 HRA Implications

No Likely Significant Effect (LSE) at this stage.

Table 2. Policy H.1 Providing for and diversifying the housing mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		n/a	+	O	n/a	O	+	n/a	O								
Medium Term		++				++	+		n/a	++	-	n/a	O	+	n/a	O								
Long Term		++				++	+		n/a	+	-	n/a	O	+	n/a	O								
Direct / Indirect		D				D	I		n/a	D	D	n/a	I	D	n/a	D								
Temporary / Permanent		P				P	P		n/a	P/T	P	n/a	P	P	n/a	P								
Local / Greater London / Wider Region / Global		L				GL	GL		n/a	L	L/G L	n/a	L/GL	L	n/a	L								
<b>EQIA</b>																								
Short Term	++	++	++	n/a	+	+	+		n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	++	n/a	++	+	+		n/a	++	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	++	++	n/a	++	+	+		n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P/T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/G L/WR	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Medium Term	+		++		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Long Term	+		++		++		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Direct / Indirect	D		D		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	D		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	P		n/a
Local / Greater London / Wider Region / Global	L		L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L/GL	L		n/a
<b>CSIA</b>																								
Short Term				?			+		n/a															
Medium Term				?			+		n/a															
Long Term				?			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 4 Option 2a of Policy H.1 Providing for and diversifying the housing mix

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### 4.1 Option appraisal

**Option 2a** - to update from HRS evidence requirements on housing mix requirements with increased specificity.

### 4.2 Assessment

The policy supports the diversification of housing provision by securing an appropriate mix of accommodation types to meet identified needs set out in the 2018 HRS. It sets out a specific requirement to deliver affordable two and three-bedroom homes and two-bedroom market homes. A mix of accommodation promotes mixed and inclusive communities. Specifying the need to provide two and three-bedroom homes enables the delivery of housing that supports the needs of residents in the LLDC Planning Area. The provision of inclusive, well-designed housing is likely to play a role in reducing homelessness and overcrowding, and contribute to a range of positive health outcomes.

The policy supports sustainable land use by promoting regeneration, encouraged through development on brownfield land, which can provide benefits for existing communities in terms of social infrastructure provision.

The policy supports a mix of housing units, including family housing. The supporting texts goes further to suggest that family housing could be designed to support home working practices. The facilitation of home working may help to deliver economic growth, diversify the economy, create opportunities for unemployed, encourage business start-ups/SMEs and support social enterprise, voluntary and community sectors.

The construction of additional housing will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Although the policy does not directly address supporting infrastructure, the consideration of existing and future infrastructure requirements could be considered as part of the evidence base to support appropriate housing delivery. The limited consideration of infrastructure could adversely impact on housing delivery, and result in unsustainable growth.

The policy outlines that the proposal is in accordance with all relevant policies of the Local Plan and this includes avoiding detrimental impacts on the historic environment

and heritage assets. However, there are not any conditions in the policy that support the conservation and enhancement of the historic environment.

In referring to the brownfield register to achieve housing need, the policy promotes the redevelopment of brownfield sites at a strategic level, thereby enhancing the site through remediation. Redevelopment of brownfield sites will need to address ground contamination risks to human health. Appropriate remediation and mitigation of risks will lead to an improvement in the site condition.

The policy relates to diversifying the range of housing provision. The supporting text requires justification for the need for the development where it is considered that a proposal could harm the residential amenity, character or function of the area. This does not explicitly refer to noise however it ensures that where there is potential to harm amenity it is justified.

### 4.3 HRA Implications

No Likely Significant Effect (LSE) at this stage.

Table 3. Policy H.1 Providing for and diversifying the housing mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		n/a	+	O	n/a	O	+	n/a	O								
Medium Term		++				+	+		n/a	+	-	n/a	O	+	n/a	O								
Long Term		++				+	+		n/a	+	-	n/a	O	+	n/a	O								
Direct / Indirect		D				D	I		n/a	D	D	n/a	I	D	n/a	D								
Temporary / Permanent		P				P	P		n/a	P, T	P	n/a	P	P	n/a	P								
Local / Greater London / Wider Region / Global		L				GL	GL		n/a	L	L/G L	n/a	L, GL	L	n/a	L								
<b>EQIA</b>																								
Short Term	++	++	++	n/a	+	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	++	n/a	++	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	++	++	n/a	++	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P, T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/G L/W R	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Medium Term	+		++		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Long Term	+		++		++		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Direct / Indirect	D		D		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	D		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	P		n/a
Local / Greater London / Wider Region / Global	L		L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	L		n/a
<b>CSIA</b>																								
Short Term				?			+		n/a															
Medium Term				?			+		n/a															
Long Term				?			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 5 Option 2b of Policy H.1 Providing for and diversifying the housing mix

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### 5.1 Option appraisal

**Option 2b** - as above plus London Plan direction for housing delivery including small sites and reference to design codes.

### 5.2 Assessment

The policy supports the diversification of housing provision by securing an appropriate mix of accommodation types to meet identified needs set out in the 2018 HRS. It sets out a specific requirement to deliver affordable two and three-bedroom homes and two-bedroom market homes. A mix of accommodation promotes mixed and inclusive communities. Specifying the need to provide two and three-bedroom homes enables the delivery of housing that supports the needs of residents in the LLDC Planning Area.

The provision of inclusive, well-designed housing is likely to play a role in reducing homelessness and overcrowding, and contribute to a range of positive health outcomes. The policy supports sustainable land use by promoting regeneration, encouraged through development on brownfield land, which can provide benefits for existing communities in terms of social infrastructure provision. The inclusion of small sites in line with the Draft New London Plan increases the land available for development.

The policy supports a mix of housing units, including family housing. The supporting texts goes further to suggest that family housing could be designed to support home working practices. The facilitation of home working may help to deliver economic growth, diversify the economy, create opportunities for unemployed, encourage business start-ups/SMEs and support social enterprise, voluntary and community sectors.

The construction of additional housing will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. The addition of small sites also increases opportunities for smaller construction firms to contribute to development in the LLDC Planning Area. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile. Although the policy does not directly address supporting infrastructure,

the consideration of existing and future infrastructure requirements could be considered as part of the evidence base to support appropriate housing delivery. The limited consideration of infrastructure could adversely impact on housing delivery, and result in unsustainable growth.

The policy outlines that the proposal is in accordance with all relevant policies of the Local Plan and this includes avoiding detrimental impacts on the historic environment and heritage assets. However, there are not any conditions in the policy that support the conservation and enhancement of the historic environment.

In referring to the brownfield register to achieve housing need, the policy promotes the redevelopment of brownfield sites at a strategic level, thereby enhancing the site through remediation. Redevelopment of brownfield sites will need to address ground contamination risks to human health. Appropriate remediation and mitigation of risks will lead to an improvement in the site condition.

The policy relates to diversifying the range of housing provision. The supporting text requires justification for the need for the development where it is considered that a proposal could harm the residential amenity, character or function of the area. This does not explicitly refer to noise however it ensures that where there is potential to harm amenity it is justified.

### 5.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 4. Policy H.1 Providing for and diversifying the housing mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		n/a	+	O	n/a	O	+	n/a	O								
Medium Term		++				++	++		n/a	+	-	n/a	O	+	n/a	O								
Long Term		++				++	++		n/a	+	-	n/a	O	+	n/a	O								
Direct / Indirect		D				D	I		n/a	D	D	n/a	I	D	n/a	D								
Temporary / Permanent		P				P	P		n/a	P, T	P	n/a	P	P	n/a	P								
Local / Greater London / Wider Region / Global		L				GL	GL		n/a	L	L/G L	n/a	L, GL	L	n/a	L								
<b>EQIA</b>																								
Short Term	++	++	++	n/a	+	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	++	n/a	++	+	++	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	++	++	n/a	++	++	++	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P, T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/G L/ WR	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Medium Term	+		++		+		++		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Long Term	+		++		++		++		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Direct / Indirect	D		D		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	D		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	P		n/a
Local / Greater London / Wider Region / Global	L		L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	L		n/a
<b>CSIA</b>																								
Short Term				?			+		n/a															
Medium Term				?			++		n/a															
Long Term				?			++		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 6 Option 3a of Policy H.1: Providing for and diversifying the housing mix

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### 6.1 Option appraisal

**Option 3a** - as 2a plus inclusion of Build to Rent specifically (see Policy H.7 below)

### 6.2 Assessment

The policy supports the diversification of housing provision by securing an appropriate mix of accommodation types to meet identified needs set out in the 2018 HRS. It sets out a specific requirement to deliver affordable two and three-bedroom homes and two-bedroom market homes and also includes build-to-rent options. A mix of accommodation promotes mixed and inclusive communities. This policy is likely to increase the range and affordability of housing, and promote accessible and adaptable homes.

The policy will enable low income households to access a variety of housing choices including rental properties. Specifying the need to provide two and three-bedroom homes enables the delivery of housing that supports the needs of residents in the LLDC Planning Area. This inclusion of high quality design requirements and build-to-rent options will improve tenure security and support residents to remaining in the area. The provision of inclusive, well-designed housing is likely to play a role in reducing homelessness and overcrowding, and contribute to a range of positive health outcomes.

The policy supports sustainable land use by promoting regeneration, encouraged through development on brownfield land, which can provide benefits for existing communities in terms of social infrastructure provision.

The policy supports a mix of housing units, including family housing. The supporting texts goes further to suggest that family housing could be designed to support home working practices. The facilitation of home working may help to deliver economic growth, diversify the economy, create opportunities for unemployed, encourage business start-ups/SMEs and support social enterprise, voluntary and community sectors.

The construction of additional housing will create economic benefits through construction employment as well as multiplier effects (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

Although the policy does not directly address supporting infrastructure, the consideration of existing and future infrastructure requirements could be considered as part of the evidence base to support appropriate housing delivery. The limited consideration of infrastructure could adversely impact on housing delivery, and result in unsustainable growth.

The policy outlines that the proposal is in accordance with all relevant policies of the Local Plan and this includes avoiding detrimental impacts on the historic environment and heritage assets. However, there are not any conditions in the policy that support the conservation and enhancement of the historic environment.

In referring to the brownfield register to achieve housing need, the policy promotes the redevelopment of brownfield sites at a strategic level, thereby enhancing the site through remediation. Redevelopment of brownfield sites will need to address ground contamination risks to human health. Appropriate remediation and mitigation of risks will lead to an improvement in the site condition.

The policy relates to diversifying the range of housing provision. The supporting text requires justification for the need for the development where it is considered that a proposal could harm the residential amenity, character or function of the area. This does not explicitly refer to noise however it ensures that where there is potential to harm amenity it is justified.

### 6.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 5. Policy H.1: Providing for and diversifying the housing mix

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				+	+		n/a	+	O	n/a	O	+	n/a	O								
Medium Term		++				+	+		n/a	+	-	n/a	O	+	n/a	O								
Long Term		++				++	+		n/a	+	-	n/a	O	+	n/a	O								
Direct / Indirect		D				D	I		n/a	D	D	n/a	I	D	n/a	D								
Temporary / Permanent		P				P	P		n/a	P, T	P	n/a	P	P	n/a	P								
Local / Greater London / Wider Region / Global		L				GL	GL		n/a	L	L/G L	n/a	L, GL	L	n/a	L								
<b>EQIA</b>																								
Short Term	++	++	++	n/a	++	+	+	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	++	++	n/a	++	+	++	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	++	++	n/a	++	++	++	++	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	I	I	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	P, T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L	L	L	n/a	L/G L/W R	L	L	L	n/a	L	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	O		+		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Medium Term	O		+		++		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Long Term	O		+		++		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	+		n/a
Direct / Indirect	D		D		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	D		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	P		n/a
Local / Greater London / Wider Region / Global	L		L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	L		n/a
<b>CSIA</b>																								
Short Term				n/a			+		n/a															
Medium Term				n/a			+		n/a															
Long Term				n/a			+		n/a															
Direct / Indirect				n/a			I		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 7 Option 1a of Policy H.2: Delivering affordable housing

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### 7.1 Option appraisal

**Option 1a-** Update to reflect new London Plan requirements and within the Affordable Housing Viability (AHV) SPG, including by habitable room setting out local requirement for the 40% based upon HRS information.

### 7.2 Assessment

This policy supports the provision of affordable housing in line with AHV SPG and HRS housing requirements, including the delivery of 60% low cost rented and 40% intermediate housing. The increase in affordable housing supply will help to meet London's diverse accommodation needs by offering a greater range of options. The increase in affordable housing supply could also play a role in reducing homelessness and overcrowding, supporting a range of positive health outcomes.

By identifying targets for intermediate and low-cost housing delivery, the policy is managing local requirements and delivering a wider range of homes. Intermediate housing may support the younger population in the LLDC Planning area through the provision of lower income homes. This creates resilient communities and enables supports a number of groups including young care leavers, parents in temporary accommodation and those in receipt of income benefits, to benefit from lower than market level rents (discounted rents) and London affordable rents.

The policy supports the sustainable use of land by ensuring that affordable housing is placed in locations with housing need and can provide opportunities to integrate with and enhance the existing community.

The construction of affordable housing units will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy supports the development of an inclusive mixed-use neighbourhood and the provision of affordable housing. Depending on the nature and age of the historic environment, the housing may affect the setting of the historic environment and/or any protected views. However, mitigation measures may be put in place to minimise the impacts and design measures may ensure aesthetic consistency with the current environment. The impact of this policy on the historic environment very much depends on the significance of the cultural heritage where the development is scheduled to be built.

### 7.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 6. Policy H.2: Delivering affordable housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Medium Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Long Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Direct / Indirect		D/I				n/a	D		n/a	D	D	n/a	I	n/a	n/a	n/a								
Temporary / Permanent		P				n/a	P		n/a	T	P	n/a	P	n/a	n/a	n/a								
Local / Greater London / Wider Region / Global		L/G L				n/a	L		n/a	L, GL, WR	L/G L	n/a	L/G L	n/a	n/a	n/a								
<b>EQIA</b>																								
Short Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	+	++	n/a	++	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	+	++	n/a	++	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D/I	I	I/D	n/a	D	D	D	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	n/a	L/G L/WR	L	L	L/G L	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		+		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	+		+		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	+		+		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	D/I		D/I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L		L/G L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			O		n/a															
Medium Term				n/a			O		n/a															
Long Term				n/a			O		n/a															
Direct / Indirect				n/a			D		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 8 Option 1b of Policy H.2: Delivering affordable housing

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### 8.1 Option appraisal

**Option 1b** - Update to reflect new London Plan requirements and within AHV SPG including by habitable room utilising HRS housing requirements information.

### 8.2 Assessment

This policy supports the provision of affordable housing in line with AHV SPG and HRS housing requirements. The increase in affordable housing supply will help to meet London's diverse accommodation needs by offering a greater range of options. The increase in affordable housing supply could also play a role in reducing homelessness and overcrowding, supporting a range of positive health outcomes.

The delivery of a range of housing can help to create resilient communities and enables supports a number of groups including young care leavers, parents in temporary accommodation and those in receipt of income benefits, to benefit from lower than market level rents (discounted rents) and London affordable rents.

The policy supports the sustainable use of land by ensuring that affordable housing is placed in locations with housing need and can provide opportunities to integrate with and enhance the existing community.

The construction of affordable housing units will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployment. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy supports the development of an inclusive mixed-use neighbourhood and the provision of affordable housing. Depending on the nature and age of the historic environment, the housing may affect the setting of the historic environment and/or any protected views. However, mitigation measures may be put in place to minimise the impacts and design measures may ensure aesthetic consistency with the current environment. The impact of this policy on the historic environment very much depends on the significance of the cultural heritage where the development is scheduled to be built.

### 8.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 7. Table 1: Policy H.2: Delivering affordable housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Medium Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Long Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Direct / Indirect		D/I				n/a	D		n/a	D	D	n/a	I	n/a	n/a	n/a								
Temporary / Permanent		P				n/a	P		n/a	T	P	n/a	P	n/a	n/a	n/a								
Local / Greater London / Wider Region / Global		L/G L				n/a	L		n/a	L, GL, WR	L/G L	n/a	L/G L	n/a	n/a	n/a								
<b>EQIA</b>																								
Short Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D/I	I	D/I	n/a	D	D	D	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	n/a	L/G L/WR	L	L	L/G L	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		+		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	+		+		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	+		+		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	I		D/I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L		L/G L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			O		n/a															
Medium Term				n/a			O		n/a															
Long Term				n/a			O		n/a															
Direct / Indirect				n/a			D		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 9 Option 2b of Policy H.2: Delivering affordable housing

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### 9.1 Option appraisal

**Option 2b** - as 1b plus reference to Build to Rent (see Policy H.7)

### 9.2 Assessment

This policy supports the provision of affordable housing in line with AHV SPG and HRS housing requirements. The increase in affordable housing supply and build to rent options will help to meet London's diverse accommodation needs by offering a greater range of housing and tenure types. The increase in affordable housing supply could also play a role in reducing homelessness and overcrowding, supporting a range of positive health outcomes.

The delivery of a range of housing and tenure types can help to create resilient communities and enables supports a number of groups including young care leavers, parents in temporary accommodation and those in receipt of income benefits, to benefit from lower than market level rents (discounted rents) and London affordable rents.

The policy supports the sustainable use of land by ensuring that affordable housing is placed in locations with housing need and can provide opportunities to integrate with and enhance the existing community.

The construction of affordable housing units will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy supports the development of an inclusive mixed-use neighbourhood and the provision of affordable housing. Depending on the nature and age of the historic environment, the housing may affect the setting of the historic environment and/or any protected views. However, mitigation measures may be put in place to minimise the impacts and design measures may ensure aesthetic consistency with the current environment. The impact of this policy on the historic environment very much depends on the significance of the cultural heritage where the development is scheduled to be built.

### 9.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 8. Policy H.2: Delivering affordable housing

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Medium Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Long Term		++				n/a	O		n/a	+	?	n/a	?	n/a	n/a	n/a								
Direct / Indirect		D/I				n/a	D		n/a	D	D	n/a	I	n/a	n/a	n/a								
Temporary / Permanent		P				n/a	P		n/a	T	P	n/a	P	n/a	n/a	n/a								
Local / Greater London / Wider Region / Global		L/G L				n/a	L		n/a	L, GL, WR	L/G L	n/a	L/G L	n/a	n/a	n/a								
<b>EQIA</b>																								
Short Term	++	+	++	n/a	+	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	+	++	n/a	++	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	+	++	n/a	++	+	O	++	n/a	+	?	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	I	D/I	n/a	D	D	D	D	n/a	D	D	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	P	P	P	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L	L/G L	L/G L	n/a	L/G L/WR	L	L	L/G L	n/a	L, GL, WR	L	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	+		++		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	+		++		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	+		++		+		O		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	I		D/I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L		L/G L		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			O		n/a															
Medium Term				n/a			O		n/a															
Long Term				n/a			O		n/a															
Direct / Indirect				n/a			D		n/a															
Temporary / Permanent				n/a			P		n/a															
Local / Greater London / Wider Region / Global				n/a			L		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 10 Option 1 of Policy H.3: Meeting accommodation needs of older persons households

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### 10.1 Option appraisal

**Option 1** - update to reflect new London Plan policy H15.

### 10.2 Assessment

The policy supports the delivery of high quality older persons' accommodation to meet strategic and local needs for specialist types of provision, including affordable options. This includes proximity to transport modes, social infrastructure and centres, along with ensuring inclusive and accessible design. This will help to meet the diverse housing needs of London, and support resident amenity and community cohesion.

The provision of older persons accommodation includes an element of care related employment. Such development will therefore contribute to increased productivity, economic diversification and offer an opportunity to reduce unemployment. The construction of these units will also create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile. ""

The policy supports the provision of appropriate social and physical infrastructure to support the delivery of older persons' accommodation. This includes proximity to transport modes, social infrastructure, and local centres, along with inclusive design. This will improve accessibility and enhance opportunities for elderly people to engage with cultural venues. This has a multitude of positive benefits including enhanced life-satisfaction (and associated health and wellbeing), greater independence for the elderly generation, and social integration between the elderly and the wider community.

The policy supports the provision of appropriate social and physical infrastructure to support the delivery of older persons' accommodation. As a result, there will be improved social infrastructure, transport modes and centres and thereby greater accessibility and connectivity for the elderly population to cultural activities. Whilst this does not present any strategies to directly enhance participation to cultural activities, participation in cultural activities will not reduce because of the policy.

### 10.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 9. Policy H.3: Meeting accommodation needs of older persons households

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				n/a	n/a		O	+	+	n/a	+	n/a											
Medium Term		+				n/a	n/a		O	+	+	n/a	+	n/a											
Long Term		+				n/a	n/a		O	+	+	n/a	+	n/a											
Direct / Indirect		D				n/a	n/a		I	D	D	n/a	I	n/a											
Temporary / Permanent		P				n/a	n/a		P	P, T	P	n/a	P, T	n/a											
Local / Greater London / Wider Region / Global		L/G L/W R				n/a	n/a		L	L, GL, WR	L/G L	n/a	L	n/a											
<b>EQIA</b>																									
Short Term	+	+	+	n/a	+	n/a	+	++	O	+	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Medium Term	+	+	+	n/a	+	n/a	+	++	O	+	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Long Term	++	+	+	n/a	+	n/a	+	++	O	+	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Direct / Indirect	D	I	I	n/a	D	n/a	D	I	I	D	D	n/a	I	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Temporary / Permanent	P	P	P	n/a	P	n/a	P	P	P	P, T	P	n/a	P, T	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	L	L/G L/W R	L	L, GL, WR	L	n/a	L	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
<b>HIA</b>																									
Short Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Medium Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Long Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Direct / Indirect	I		I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
<b>CSIA</b>																									
Short Term				n/a			+		n/a																
Medium Term				n/a			+		n/a																
Long Term				n/a			+		n/a																
Direct / Indirect				n/a			D		n/a																
Temporary / Permanent				n/a			P		n/a																
Local / Greater London / Wider Region / Global				n/a			L		n/a																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 11 Option 2b of Policy H.3: Meeting accommodation needs of older persons households

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### 11.1 Option appraisal

**Option 2b** - as 2a plus other/new forms of accommodation to meet needs. 2a includes updates to reflect draft London Plan policy H15 and include updated C2/C3 distinctions.

### 11.2 Assessment

The policy supports the delivery of high quality older persons' accommodation to meet strategic and local needs for specialist types of provision, including affordable options. This includes proximity to transport modes, social infrastructure and centres, along with ensuring inclusive and accessible design. This will help to meet the diverse housing needs of London, and support resident amenity and community cohesion. The policy specifies the need to deliver C2/C3 accommodation, identifying the need to deliver self-contained/extra care C3 accommodation and also C2 housing in the form of residential care homes. This ensures that the policy supports a broader definition of the aging population, acknowledging that the LLDC planning area has a younger population and therefore a greater demand with lower levels of care.

The provision of older persons accommodation, particularly C2 accommodation, includes element of care related employment. Such development will therefore contribute to increased productivity, economic diversification and offer an opportunity to reduce unemployment. The construction of these units will also create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

The policy supports the provision of appropriate social and physical infrastructure to support the delivery of older persons' accommodation. This includes proximity to transport modes, social infrastructure, and local centres, along with inclusive design. This will improve accessibility and enhance opportunities for elderly people to engage with cultural venues. This has a multitude of positive benefits including enhanced life-satisfaction (and associated health and wellbeing), greater independence for the elderly generation, and social integration between the elderly and the wider community.

The policy supports the provision of appropriate social and physical infrastructure to support the delivery of older persons' accommodation. As a result, there will be improved social infrastructure, transport modes and centres and thereby greater accessibility and connectivity for the elderly population to cultural activities. Whilst

this does not present any strategies to directly enhance participation to cultural activities, participation in cultural activities will not reduce because of the policy.

### 11.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 10. Policy H.3: Meeting accommodation needs of older persons households

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				n/a	n/a		O	+	+	n/a	+	n/a											
Medium Term		+				n/a	n/a		O	+	+	n/a	+	n/a											
Long Term		+				n/a	n/a		O	+	+	n/a	+	n/a											
Direct / Indirect		D				n/a	n/a		I	D	D	n/a	I	n/a											
Temporary / Permanent		P				n/a	n/a		P	P, T	P	n/a	P, T	n/a											
Local / Greater London / Wider Region / Global		L/G L/W R				n/a	n/a		L	L, GL, WR	L/G L	n/a	L	n/a											
<b>EQIA</b>																									
Short Term	+	+	+	n/a	+	n/a	+	++	O	+	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Medium Term	+	+	+	n/a	+	n/a	+	++	O	+	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Long Term	++	+	+	n/a	+	n/a	+	++	O	+	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Direct / Indirect	D	I	I	n/a	D	n/a	D	I	I	D	D	n/a	I	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Temporary / Permanent	P	P	P	n/a	P	n/a	P	P	P	P, T	P	n/a	P, T	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	L	L/G L/W R	L	L, GL, WR	L	n/a	L	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
<b>HIA</b>																									
Short Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Medium Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Long Term	+		o		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Direct / Indirect	I		I		D		D		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Temporary / Permanent	P		P		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
<b>CSIA</b>																									
Short Term				n/a			+		n/a																
Medium Term				n/a			+		n/a																
Long Term				n/a			+		n/a																
Direct / Indirect				n/a			D		n/a																
Temporary / Permanent				n/a			P		n/a																
Local / Greater London / Wider Region / Global				n/a			L		n/a																

**Objectives**

1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice
3. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
4. To contribute to safety and security and the perceptions of safety
5. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
6. Make the best and most efficient use of land so as to support sustainable patterns and forms of development
7. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
8. To maximise accessibility for all in and around London
9. To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
10. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
11. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
12. To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
13. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
14. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
15. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17. To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
18. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
19. To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
20. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
21. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22. To conserve London's geodiversity and protect soils from development and over intensive use.
23. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 12 Option 1 of Policy H.4: Providing student accommodation

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### 12.1 Option appraisal

**Option 1** - to reflect new London Plan considerations

### 12.2 Assessment

The policy supports the objective of making London an inclusive city as higher education institutes (HEI) provide opportunities for students from various backgrounds and areas to be part of a local community and area. The policy also supports the appropriate provision of well-connected student accommodation to meet local and strategic needs. This includes ensuring accommodation is easily accessible by walking, cycling and public transport infrastructure, and that suitable transport and healthcare provision is available to the student population. This supports equity of access to key services and opportunities.

Student accommodation supports the increase in local spending power, night time economy and the general character of an area. The provision of affordable housing options will also contribute to providing opportunities for residents to develop a sense of community. The policy also supports the appropriate provision of well-connected student accommodation to meet local and strategic needs. This includes the provision of affordable options, available for long-term use. This could promote accessible and affordable housing options to meet the needs of the student population, and help to improve local amenity. This could also help to reduce overcrowding and homelessness amongst the student population, and promote a range of health benefits.

The policy supports good design by seeking to ensure that new PBSA is co-located with the institution to which it is linked, which can promote social integration surrounding the campus and help people feel positive about the area in which they live, without adversely affecting the existing community.

The construction of student accommodation units will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers,

tends to be highly mobile. In the long term, the provision of additional student accommodation may support economic growth related to the spending of the student population within the local economy and potentially lead to economic diversification in response to student's retail and leisure demands.

The policy supports the appropriate provision of well-connected student accommodation to meet local and strategic needs. This includes ensuring accommodation is easily accessible by walking, cycling and public transport infrastructure. The policy supports that S106 contributions will be required to help mitigate impact on key services such as transport infrastructure and health facilities. The provision of student accommodation, and appropriate consideration of supporting infrastructure could also underpin economic competitiveness, to ensure London remains an attractive destination for students, both domestically and internationally.

The provision of additional student accommodation may assist some adults in the wider region (both nationally and internationally) to attend HEI located within the LLDC planning area and thereby improve their learning, skills attainment and life chances. However, the impact for residents within the LLDC planning area is assumed to be minimal, given that presence or otherwise of student accommodation is irrelevant and unlikely to influence ability to attend HEI.

The policy states that new student accommodation should have no unacceptable adverse amenity impacts and the supporting text states that all proposals should demonstrate how potential for noise, disturbance and amenity impacts will be minimised through a management scheme. This does not reduce existing noise levels however it is in keeping with the agent of change principle in that it is required that adverse noise impacts and disturbance are avoided.

### 12.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 11. Policy H.4: Providing student accommodation

IIA Element	IIA Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
<b>SEA</b>																									
Short Term		+				+	n/a		n/a	+	+	++	n/a	+											
Medium Term		+				+	n/a		n/a	+	+	++	n/a	+											
Long Term		+				+	n/a		n/a	+	+	++	n/a	+											
Direct / Indirect		D				D	n/a		n/a	D	D	D	n/a	D											
Temporary / Permanent		P				P	n/a		n/a	T, P	P	P	n/a	P											
Local / Greater London / Wider Region / Global		L/G L/W R				L	n/a		n/a	L, GL, WR	L/G L	L, GL, WR	n/a	L											
<b>EQIA</b>																									
Short Term	+	O	n/a	n/a	+	n/a	+	+	n/a	+	+	++	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Medium Term	+	O	n/a	n/a	+	n/a	+	+	n/a	+	+	++	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Long Term	+	O	n/a	n/a	+	n/a	+	+	n/a	+	+	++	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Direct / Indirect	D	D	n/a	n/a	D	n/a	I	D	n/a	D	D	D	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Temporary / Permanent	P	P	n/a	n/a	P	n/a	P	P	n/a	T, P	P	P	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	n/a	n/a	L/G L/W R	n/a	L	L/G L/W R	n/a	L, GL, WR	L	L, GL, WR	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a	
<b>HIA</b>																									
Short Term	O		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Medium Term	O		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Long Term	O		n/a		+		+		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Direct / Indirect	D		n/a		D		I		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Temporary / Permanent	P		n/a		P		P		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
Local / Greater London / Wider Region / Global	L/G L/W R		n/a		L/G L		L		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a	
<b>CSIA</b>																									
Short Term				?			+		n/a																
Medium Term				?			+		n/a																
Long Term				?			+		n/a																
Direct / Indirect				I			I		n/a																
Temporary / Permanent				T/P			P		n/a																
Local / Greater London / Wider Region / Global				L			L		n/a																

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 13 Option 1 of Policy H.5: Location of gypsy and traveller accommodation

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### 13.1 Option appraisal

**Option 1** - update to reflect new London Plan definitions

### 13.2 Assessment

The policy supports the needs of the gypsy and traveller community and enables communities to be allocated new sites that support access to local infrastructure and amenities, such as education and healthcare. Sites that are placed with good access to amenities, social and community facilities, road networks and other transport modes will benefit the gypsy and traveller community by improving mental wellbeing. This will enable travelling communities to locate safeguarded sites and new sites are located.

The policy supports the protection and enhancement of gypsy and traveller sites, identifying new provision in line with need. This includes appropriate access to amenities, social and community facilities, and key transport infrastructure. The policy also supports the amenity of existing and potential residents, including through noise, smells, and limited privacy. The provision of high quality and well serviced sites are likely to support a range of positive health outcomes, and help reduce overcrowding and homelessness.

This policy suggests that there will be adequate provision for the needs of gypsies and travellers subject to a number of conditions. The conditions include that there will be no adverse noise and light impacts, and this will therefore reduce negative impacts on the existing land use and neighbourhoods. The LLDC is a small planning area however and land will need to be used sustainably and efficiently to ensure local demand can be met.

The policy states that existing sites will be safeguarded and new sites will be acceptable where the residential amenity of both existing and potential residents is not adversely affected including noise. This does not reduce existing noise levels however it is in keeping with the agent of change principle in that it is required that adverse noise impacts are avoided both for existing and potential residents.

### 13.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 12. Policy H.5: Location of gypsy and traveller accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				?	n/a		n/a	n/a	+	n/a	+	n/a	n/a	O	+							
Medium Term		+				?	n/a		n/a	n/a	+	n/a	+	n/a	n/a	O	+							
Long Term		+				?	n/a		n/a	n/a	+	n/a	+	n/a	n/a	O	+							
Direct / Indirect		D				I	n/a		n/a	n/a	D	n/a	I	n/a	n/a	D	D							
Temporary / Permanent		P				P	n/a		n/a	n/a	P	n/a	T, P	n/a	n/a	T/P	P							
Local / Greater London / Wider Region / Global		L/G L/W R				L	n/a		n/a	n/a	L/G L	n/a	L	n/a	n/a	L	L							
<b>EQIA</b>																								
Short Term	+	O	+	n/a	+	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	+	O	+	n/a	+	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	+	O	+	n/a	+	n/a	n/a	+	n/a	n/a	+	n/a	+	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	n/a	n/a	D	n/a	n/a	D	n/a	I	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	n/a	n/a	P	n/a	n/a	P	n/a	T, P	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	n/a	L/G L/W R	n/a	n/a	L	n/a	L	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	O		+		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Medium Term	O		+		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Long Term	O		+		+		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	O	n/a		n/a
Direct / Indirect	D		D		D		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	T, P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	L	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

**Objectives**

- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
- To ensure London has socially integrated communities which are strong, resilient and free of prejudice
- To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
- To contribute to safety and security and the perceptions of safety
- To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
- Make the best and most efficient use of land so as to support sustainable patterns and forms of development
- To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
- To maximise accessibility for all in and around London
- To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
- To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
- To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
- To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
- To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
- To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
- To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
- To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
- To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
- To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
- To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
- To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
- To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 14 Option 1 of Policy H.7: Shared living accommodation

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### 14.1 Option appraisal

**Option 1** - do not include a shared living policy and rely upon London Plan H18

### 14.2 Assessment

This option does not include a Shared Living policy and therefore does not support resilience and a socially integrated city, as shared living developments may not be adequately reflected locally. This approach is likely to adversely affect the equality groups, marginalising opportunities to develop a sense of community and ownership due to restricted housing opportunities.

This option does not include a Shared Living policy, and instead relies upon Policy H18 in the London Plan. Without a specific policy in the Local Plan, the delivery of shared accommodation could be limited. This could have adverse impacts on overall housing delivery, and could restrict alternative forms of accommodation that supports the needs of different communities across London. This could also have adverse impacts on overall housing delivery, and could contribute to existing issues of homelessness and overcrowding.

Without a specific policy in the Local Plan, the delivery of shared housing may not be appropriately located within the local context to ensure development on brownfield sites and the use of existing transport networks. Additionally, the delivery of shared accommodation could be limited. This could have adverse impacts on overall housing delivery, and could restrict alternative forms of accommodation directed towards the Metropolitan Centre (typically equipped with strong transportation links). This can therefore limit accessibility to cultural venues which may lead to decreased community engagement with such facilities, and a decline in inward investment and economic productivity of the area. It could also have adverse impacts on ensuring high quality design standards which may also help to avoid detrimental impacts on the historic environment during development.

### 14.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 13. Policy H.7: Shared living accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		-				-	n/a		n/a	n/a	n/a	n/a	-	n/a	n/a	n/a	+	n/a	n/a	n/a	-	n/a	n/a	n/a
Medium Term		-				-	n/a		n/a	n/a	n/a	n/a	-	n/a	n/a	n/a	+	n/a	n/a	n/a	-	n/a	n/a	n/a
Long Term		-				-	n/a		n/a	n/a	n/a	n/a	-	n/a	n/a	n/a	+	n/a	n/a	n/a	-	n/a	n/a	n/a
Direct / Indirect		D				I	n/a		n/a	n/a	n/a	n/a	I	n/a	n/a	n/a	D	n/a	n/a	n/a	I	n/a	n/a	n/a
Temporary / Permanent		P				P	n/a		n/a	n/a	n/a	n/a	P	n/a	n/a	n/a	P	n/a	n/a	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	n/a		n/a	n/a	n/a	n/a	L, GL, WR	n/a	n/a	n/a	L	n/a	n/a	n/a	L, GL	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	-	O	O	n/a	-	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	-	O	O	n/a	-	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	-	O	O	n/a	-	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	D	D	D	n/a	D	n/a	n/a	D	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	P	P	n/a	P	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	n/a	L/G L/W R	n/a	n/a	n/a	n/a	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	O		O		-		n/a		n/a	n/a				n/a	n/a		+	n/a		n/a	-	n/a		n/a
Medium Term	O		O		-		n/a		n/a	n/a				n/a	n/a		+	n/a		n/a	-	n/a		n/a
Long Term	O		O		-		n/a		n/a	n/a				n/a	n/a		+	n/a		n/a	-	n/a		n/a
Direct / Indirect	D		D		D		n/a		n/a	n/a				n/a	n/a		D	n/a		n/a	I	n/a		n/a
Temporary / Permanent	P		P		P		n/a		n/a	n/a				n/a	n/a		P	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		n/a		n/a	n/a				n/a	n/a		L	n/a		n/a	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
  - To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
  - To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.
  - To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 15 Option 2 of Policy H.7: Shared living accommodation

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### 15.1 Option appraisal

**Option 2-** include a local shared living policy to take account of H18 with local definitions

### 15.2 Assessment

Shared accommodation provides opportunities for residents to develop a sense of ownership and community. It can help create mixed neighbourhoods, supporting resilient and strong communities. The policy facilitates the strategic need of affordable and shared living housing which could improve mental wellbeing for residents as it supports access to secure homes.

The policy supports proposals for large-scale shared living accommodation supported by communal facilities. This is likely to contribute to the overall supply and range of housing, and ensure that alternative accommodation needs are met. The requirement for high quality design, inclusive neighbourhoods, amenity space and ongoing management arrangements could help to improve resident amenity and create a sense of community and support a range of positive health and well-being outcomes.

The construction of new shared accommodation will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC planning area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

The requirement for developments to meet high residential design standards can help to improve energy efficiency and reduce the cost of heating for resident.

This policy supports the delivery of a shared living accommodation, accounting for locational direction. The policy outlines that the proposal will meet high residential design standards and this suggests avoiding detrimental impacts on the historic environment and heritage assets. However, there are not any conditions in the policy that actively support the conservation and enhancement of the historic environment.

### 15.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 14. Policy H.7: Shared living accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		++				O	+		n/a	n/a	+	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	O	n/a	n/a	n/a
Medium Term		++				O	+		n/a	n/a	+	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	O	n/a	n/a	n/a
Long Term		++				O	+		n/a	n/a	+	+	+	n/a	n/a	n/a	+	n/a	n/a	n/a	O	n/a	n/a	n/a
Direct / Indirect		D				I	I		n/a	n/a	D	D	I	n/a	n/a	n/a	D	n/a	n/a	n/a	I	n/a	n/a	n/a
Temporary / Permanent		P				P	P		n/a	n/a	P	T	P	n/a	n/a	n/a	P	n/a	n/a	n/a	P	n/a	n/a	n/a
Local / Greater London / Wider Region / Global		L/G L/W R				L	L		n/a	n/a	L/G L	L, GL, WR	L, GL, WR	n/a	n/a	n/a	L	n/a	n/a	n/a	L, GL	n/a	n/a	n/a
<b>EQIA</b>																								
Short Term	++	?	+	n/a	+	n/a	n/a	++	n/a	n/a	+	+	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Medium Term	++	?	+	n/a	+	n/a	n/a	++	n/a	n/a	+	+	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Long Term	++	?	+	n/a	+	n/a	n/a	++	n/a	n/a	+	+	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Direct / Indirect	I	?	D	n/a	D	n/a	n/a	D	n/a	n/a	D	D	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Temporary / Permanent	P	?	P	n/a	P	n/a	n/a	P	n/a	n/a	P	T	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	L/G L/W R	L/G L/W R	L/G L/W R	n/a	L/G L/W R	n/a	n/a	L/G L/W R	n/a	n/a	L	L, GL, WR	n/a	n/a	n/a		n/a		n/a	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	?		?		+		n/a		n/a	n/a				n/a	n/a		+	n/a		n/a	O	n/a		n/a
Medium Term	?		?		+		n/a		n/a	n/a				n/a	n/a		+	n/a		n/a	O	n/a		n/a
Long Term	?		?		+		n/a		n/a	n/a				n/a	n/a		+	n/a		n/a	O	n/a		n/a
Direct / Indirect	?		?		D		n/a		n/a	n/a				n/a	n/a		D	n/a		n/a	I	n/a		n/a
Temporary / Permanent	?		?		P		n/a		n/a	n/a				n/a	n/a		P	n/a		n/a	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/G L/W R		L/G L/W R		L/G L		n/a		n/a	n/a				n/a	n/a		L	n/a		n/a	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
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  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
  - To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system
  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
  - To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides.
  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 16 Option 4 of Policy H.7: Shared living accommodation

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### 16.1 Option appraisal

**Option 4** - refer to shared living as one product within a new 'Innovative Housing models' policy

### 16.2 Assessment

This option does not include a shared living policy and instead incorporates it into the housing innovations policy. Whilst this ensures that shared living is still part of the Local Plan, it still limits the potential for this policy.

Rising house and rental prices have made shared living accommodation a viable option, particularly for the younger generation. As the LLDC planning area has a younger population than neighbouring areas, this is particularly relevant. The inclusion of locational direction in the preferred option also ensures that this accommodation is delivered where there is demand and where it can contribute positively to the community. This can support the creation of mixed and diverse communities and reduce wider issues of homelessness and overcrowding.

The innovative housing models policy still supports the delivery of shared living accommodation, but provides a broader approach to housing models rather than a focused delivery of a specific type of housing which meets a specific local need.

### 16.3 HRA Implications

No Likely Significant Effects (LSE) at this stage.

Table 15. Policy H.7: Shared living accommodation

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				?	?		n/a															
Medium Term		n/a				?	?		n/a															
Long Term		n/a				?	?		n/a															
Direct / Indirect		n/a				I	I		n/a															
Temporary / Permanent		n/a				P	P		n/a															
Local / Greater London / Wider Region / Global		n/a				L	L		n/a															
<b>EQIA</b>																								
Short Term	?	n/a	n/a	n/a	?/-	n/a		n/a		n/a	n/a	n/a		n/a	n/a									
Medium Term	?	n/a	n/a	n/a	?/-	n/a		n/a		n/a	n/a	n/a		n/a	n/a									
Long Term	?	n/a	n/a	n/a	?/-	n/a		n/a		n/a	n/a	n/a		n/a	n/a									
Direct / Indirect	I	n/a	n/a	n/a	I	n/a		n/a		n/a	n/a	n/a		n/a	n/a									
Temporary / Permanent	P	n/a	n/a	n/a	P	n/a		n/a		n/a	n/a	n/a		n/a	n/a									
Local / Greater London / Wider Region / Global	L/G L	n/a	n/a	n/a	L/G L	n/a		n/a		n/a	n/a	n/a		n/a	n/a									
<b>HIA</b>																								
Short Term	n/a		n/a		?/-		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Medium Term	n/a		n/a		?/-		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Long Term	n/a		n/a		?/-		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Direct / Indirect	n/a		n/a		D		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Temporary / Permanent	n/a		n/a		P		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L/G L		n/a		n/a	n/a				n/a	n/a		n/a	n/a		n/a	n/a	n/a		n/a
<b>CSIA</b>																								
Short Term				n/a			n/a		n/a															
Medium Term				n/a			n/a		n/a															
Long Term				n/a			n/a		n/a															
Direct / Indirect				n/a			n/a		n/a															
Temporary / Permanent				n/a			n/a		n/a															
Local / Greater London / Wider Region / Global				n/a			n/a		n/a															

- Objectives**
- To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
  - To ensure London has socially integrated communities which are strong, resilient and free of prejudice
  - To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities
  - To contribute to safety and security and the perceptions of safety
  - To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand
  - Make the best and most efficient use of land so as to support sustainable patterns and forms of development
  - To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness reducing the need to travel by motorised transport
  - To maximise accessibility for all in and around London
  - To enhance and improve connectivity for all to, from, within and around London and increase the proportion of journeys made by sustainable and active transport modes
  - To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all
  - To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness
  - To ensure the education and skills provision meets the needs to London's existing and future labour market and improves life chances for all
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  - To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
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  - To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system
  - To manage the risk of flooding from all sources and improve the resilience of people and property to flooding
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  - To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
  - To conserve London's geodiversity and protect soils from development and over intensive use.
  - To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
  - To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 17 Option 1 of Policy BN.4: Designing development

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### 17.1 Option appraisal

**Option 1** - Redraft policy to simply exclude reference to the Baseline Standards and refer only to the Nationally Described Space Standards.

### 17.2 Initial assessment

The policy supports good design which can promote inclusion, a reduction in poverty, good accessibility and improved connectivity to local places and environments. Well-designed environments can help to improve confidence to take up opportunities that promote physical activity and foster an active lifestyle. Environments that promote this have a positive effect on mental wellbeing and to encourage a sense of community due to positive and inclusive design.

The policy supports the provision of high quality residential development, to contribute to integrated, legible and connected places. However, the removal of the reference to baseline standards, limits the effectiveness of the policy by removing specific standards which set a precedent for high-quality design which promotes regeneration in the LLDC Planning Area. Standards such as the LLDC Design Quality Policy provides direction and sets best practice guidance to achieve high quality design in development schemes. This policy still encourages high quality design, but what is required to achieve this is left to interpretation.

This policy supports high quality residential development which seeks to achieve a high standard of liveability and could help to reduce issues such as homelessness and overcrowding, and support positive health and wellbeing outcomes.

Good design and landscaping aspects could include SuDS and other features that might increase natural infiltration of storm water and decrease the proportion diverted to sewers. This can reduce the risk of pluvial flooding. Rainwater harvesting is one method which may reduce water demand if water is reused on site, for example in flushing toilets.

This policy highlights the need for sustainable design, and promotes the use of high-quality construction materials that age well over time. This promotes certain circular economy principles, as it will help reduce construction waste in the long term, as less repairs and maintenance should be expected.

The policy text states that residential development should minimise adverse impacts upon existing surrounding development which is in keeping with the agent of change principle. The policy does not directly require mitigation of disturbances from existing noise, however noise levels from new development have the potential to be reduced through the requirement to minimise adverse noise impacts or introduce enhancements to control existing noise sources.

### 17.3 HRA Implications

No Likely significant effect at this stage.

Table 16. Policy BN.4: Designing development

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	?/+		n/a	O	O													
Medium Term		n/a				n/a	?/+		n/a	+	O													
Long Term		n/a				n/a	?/+		n/a	++	O													
Direct / Indirect		n/a				n/a	?		n/a	I	D													
Temporary / Permanent		n/a				n/a	?		n/a	P	P													
Local / Greater London / Wider Region / Global		n/a				n/a	?		n/a	L	L													
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	n/a	?/+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	n/a	?/+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	n/a	?/+	n/a	n/a	+	n/a	n/a	n/a	n/a	n/a		n/a		+	n/a	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	D	n/a	?	n/a	n/a	I	n/a	n/a	n/a	n/a	n/a		n/a		I	n/a	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	n/a	?	n/a	n/a	P	n/a	n/a	n/a	n/a	n/a		n/a		P	n/a	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/GL	n/a	?	n/a	n/a	L	n/a	n/a	n/a	n/a	n/a		n/a		L	n/a	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		n/a		?/+		n/a	n/a					n/a	n/a		n/a	+		n/a	n/a	n/a	n/a
Medium Term	n/a		n/a		n/a		?/+		n/a	n/a					n/a	n/a		n/a	+		n/a	n/a	n/a	n/a
Long Term	n/a		n/a		n/a		?/+		n/a	n/a					n/a	n/a		n/a	+		n/a	n/a	n/a	n/a
Direct / Indirect	n/a		n/a		n/a		?		n/a	n/a					n/a	n/a		n/a	I		n/a	n/a	n/a	n/a
Temporary / Permanent	n/a		n/a		n/a		?		n/a	n/a					n/a	n/a		n/a	P		n/a	n/a	n/a	n/a
Local / Greater London / Wider Region / Global	n/a		n/a		n/a		?		n/a	n/a					n/a	n/a		n/a	L		n/a	n/a	n/a	n/a
<b>CSIA</b>																								
Short Term				n/a			?/+		n/a															
Medium Term				n/a			?/+		n/a															
Long Term				n/a			?/+		n/a															
Direct / Indirect				n/a			?		n/a															
Temporary / Permanent				n/a			?		n/a															
Local / Greater London / Wider Region / Global				n/a			?		n/a															

**Objectives**

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- To conserve London's geodiversity and protect soils from development and over intensive use.
- To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 18 Option 2 of Policy BN.4: Designing development

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### 18.1 Option appraisal

**Option 2** - Replace reference to the baseline standards with reference to the LLDC Design Quality Policy as a source of guidance on approach to quality standards for all development in the LLDC area.

### 18.2 Initial assessment

The policy supports good design which can promote inclusion, a reduction in poverty, good accessibility and improved connectivity to local places and environments. Well-designed environments can help to improve confidence to take up opportunities that promote physical activity and foster an active lifestyle.

The policy supports the provision of high quality residential development, to contribute to integrated, legible and connected places. This includes development that is in line with space standards, and seeks to achieve a high standard of liveability. The provision of high quality residential development could also play a role in reducing homelessness and overcrowding, and support positive health and wellbeing outcomes.

Landscaping aspects could include SuDS and other features that might increase natural infiltration of storm water and decrease the proportion diverted to sewers. This can reduce the risk of pluvial flooding. Rainwater harvesting is one method which may reduce water demand if water is reused on site, for example in flushing toilets. The policy does not currently reference the natural environment as an element of high quality design and liveability. However, it will ensure open spaces receive adequate levels of daylight and sunlight.

The policy actively supports the protection of heritage, stating that heritage assets should be preserved and enhanced, as should the views to/from these, and contribute positively to the setting of heritage assets, including conservation areas. The protection and enhancement of heritage assets at the design stage will also indirectly contribute towards the better management of heritage assets and tackling those at risk in these initial design phases and will enhance awareness for those assets at risk.

This policy highlights the need for sustainable design, and promotes the use of high-quality construction materials that age well over time. This promotes certain circular economy principles, as it will help reduce construction waste in the long term, as less repairs and maintenance should be expected.

The policy text states that residential development should minimise adverse impacts upon existing surrounding development which is in keeping with the agent of change principle. The policy does not directly require mitigation of disturbances from existing noise, however noise levels from new development have the potential to be reduced

through the requirement to minimise adverse noise impacts or introduce enhancements to control existing noise sources.

### 18.3 HRA Implications

No Likely significant effect at this stage.

Table 17. Policy BN.4: Designing development

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		+				n/a	++		n/a	+	+	O	+	n/a	O	O								
Medium Term		+				n/a	++		n/a	+	+	O	+	n/a	+	O								
Long Term		+				n/a	++		n/a	+	+	O	+	n/a	++	O								
Direct / Indirect		D				n/a	D		n/a	I	I	I	D	n/a	I	D								
Temporary / Permanent		P				n/a	P		n/a	P	P	P	P	n/a	P	P								
Local / Greater London / Wider Region / Global		L/GL /WR				n/a	L		n/a	L	L	L	L, GL	n/a	L	L								
<b>EQIA</b>																								
Short Term	+	+	+	n/a	+	n/a	++	+	n/a		+	O	+		n/a	n/a								
Medium Term	+	+	+	n/a	+	n/a	++	+	n/a		+	O	+		n/a	n/a								
Long Term	+	+	+	n/a	+	n/a	++	+	n/a		+	O	+		n/a	n/a								
Direct / Indirect	D	I	I	n/a	D	n/a	D	D	n/a		I	I	I		n/a	n/a								
Temporary / Permanent	P	P	P	n/a	P	n/a	P	P	n/a		P	P	P		n/a	n/a								
Local / Greater London / Wider Region / Global	L/GL /WR	L/GL /WR	L/GL /WR	n/a	L/GL	n/a	L	L/GL /WR	n/a		L	L	L, GL		n/a	n/a								
<b>HIA</b>																								
Short Term	+		++		+		++		n/a	n/a					n/a	n/a		+		+	+	n/a		n/a
Medium Term	+		++		+		++		n/a	n/a					n/a	n/a		+		+	+	n/a		n/a
Long Term	+		++		+		++		n/a	n/a					n/a	n/a		+		+	+	n/a		n/a
Direct / Indirect	I		D		I		D		n/a	n/a					n/a	n/a		I		I	D	n/a		n/a
Temporary / Permanent	P		P		P		P		n/a	n/a					n/a	n/a		P		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	L/GL /WR		L/GL /WR		L/GL		L		n/a	n/a					n/a	n/a		L		L	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				+/?			++		n/a															
Medium Term				+/?			++		n/a															
Long Term				+/?			++		n/a															
Direct / Indirect				I/D			D		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L			L		n/a															

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- To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.

## 19 Option 1 of Policy BN.5: Proposals for tall buildings

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### 19.1 Option appraisal

**Option 2-** Minor amendments to the policy to clarify expectations in terms of the “outstanding architecture” requirement in the policy where this has been a point of contention in interpretation of the policy in practice. This would clarify that meeting the relevant tests in the Policy will be what defines this term. Subsequent points in the policy.

### 19.2 Initial assessment

The policy supports proposals for well-designed, appropriately located tall buildings. This could facilitate the delivery of housebuilding to meet the needs of Londoners. The high-quality design, including relationship with surrounding uses, provision of public realm, access and servicing could help to enhance resident amenity. Depending on the type of accommodation provided, it could also help to reduce homelessness and overcrowding.

The policy does not support sustainable land use for equality purposes, since there is no express provision for the development to consider the effect of the high-density nature of tall buildings on different groups of people. Tall buildings are often a symbol of regeneration which could have positive effects on the community from the consideration of the building's contribution to the townscape and the public realm at the ground level.

The construction of tall buildings will create economic benefits through construction employment as well as multiplier effects, (i.e. service and supply contracts with local businesses and spending in the local economy by those who are directly or indirectly employed on the project). Such developments might support economic growth in the LLDC Planning Area and offer additional employment opportunities, including for those who are unemployed. However, a proportion of the employment opportunities created by development will be taken by individuals from outside the catchment area. The construction workforce, especially skilled workers, tends to be highly mobile.

This policy also refers to the refusal of applications if they have an adverse impact on micro-climate conditions (down-draughts and lateral winds).

This policy suggests that tall buildings cannot be designed nor constructed unless the building makes a positive contribution to the surrounding landscape, and does not have a significant negative impact on heritage assets. Thus, any buildings that are constructed must enhance the aesthetics of the landscape and the setting environment, thereby contributing positively to the quality and conditions of the historic environment.

### 19.3 HRA Implications

No Likely significant effect at this stage.

Table 18. Policy BN.5: Proposals for tall buildings

IIA Element	IIA Objectives																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>SEA</b>																								
Short Term		n/a				n/a	O		n/a	+	+	n/a	+	+	n/a	n/a	n/a							
Medium Term		n/a				n/a	+		n/a	+	+	n/a	+	O	n/a	n/a	n/a							
Long Term		n/a				n/a	+		n/a	+	+	n/a	+	O	n/a	n/a	n/a							
Direct / Indirect		n/a				n/a	D		n/a	D	D	n/a	I	D	n/a	n/a	n/a							
Temporary / Permanent		n/a				n/a	P		n/a	T	P	n/a	P	P	n/a	n/a	n/a							
Local / Greater London / Wider Region / Global		n/a				n/a	GL		n/a	L, GL, WR	L/G L/W R	n/a	L	L, GL	n/a	n/a	n/a							
<b>EQIA</b>																								
Short Term	n/a	n/a	n/a	n/a	+	O	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	+	n/a		n/a	n/a
Medium Term	n/a	n/a	n/a	n/a	+	O	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	+	n/a		n/a	n/a
Long Term	n/a	n/a	n/a	n/a	+	O	+	n/a	n/a	+	O	n/a	n/a	n/a	n/a		n/a		n/a	+	n/a		n/a	n/a
Direct / Indirect	n/a	n/a	n/a	n/a	D	I	I	n/a	n/a	D	I	n/a	n/a	n/a	n/a		n/a		n/a	I	n/a		n/a	n/a
Temporary / Permanent	n/a	n/a	n/a	n/a	P	P	P	n/a	n/a	T	P	n/a	n/a	n/a	n/a		n/a		n/a	P	n/a		n/a	n/a
Local / Greater London / Wider Region / Global	n/a	n/a	n/a	n/a	L/G L/W R	GL	L	n/a	n/a	L, GL, WR	L/G L	n/a	n/a	n/a	n/a		n/a		n/a	L	n/a		n/a	n/a
<b>HIA</b>																								
Short Term	n/a		n/a		?		+		n/a	n/a				n/a	?		n/a	n/a		+	+	n/a		n/a
Medium Term	n/a		n/a		?		+		n/a	n/a				n/a	?		n/a	n/a		+	+	n/a		n/a
Long Term	n/a		n/a		?		+		n/a	n/a				n/a	?		n/a	n/a		+	O	n/a		n/a
Direct / Indirect	n/a		n/a		I		I		n/a	n/a				n/a	I		n/a	n/a		I	D	n/a		n/a
Temporary / Permanent	n/a		n/a		P		P		n/a	n/a				n/a	P		n/a	n/a		P	P	n/a		n/a
Local / Greater London / Wider Region / Global	n/a		n/a		L		L		n/a	n/a				n/a	L		n/a	n/a		L	L, GL	n/a		n/a
<b>CSIA</b>																								
Short Term				O			+		n/a															
Medium Term				O			+		n/a															
Long Term				+			+		n/a															
Direct / Indirect				I			I		n/a															
Temporary / Permanent				T/P			P		n/a															
Local / Greater London / Wider Region / Global				L/G L			L		n/a															

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