



Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

Non-Technical Summary

Hyder Consulting (UK) Limited

2212959

Manning House
22 Carlisle Place
London SW1P 1JA
United Kingdom

Tel: +44 (0)20 3014 9000

Fax: +44 (0)20 7828 8428

www.hyderconsulting.com






London Legacy Development Corporation

Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

Non-Technical Summary

Author	Petya Georgieva	
Checker	David Hourd	
Approver	Caroline Soubry-Smith	
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ABBREVIATIONS

AAP	Area Action Plans
AQMAs	Air Quality Management Areas
LLDC	London Legacy Development Corporation
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SuDS	Sustainable Drainage Systems

1 INTRODUCTION AND BACKGROUND

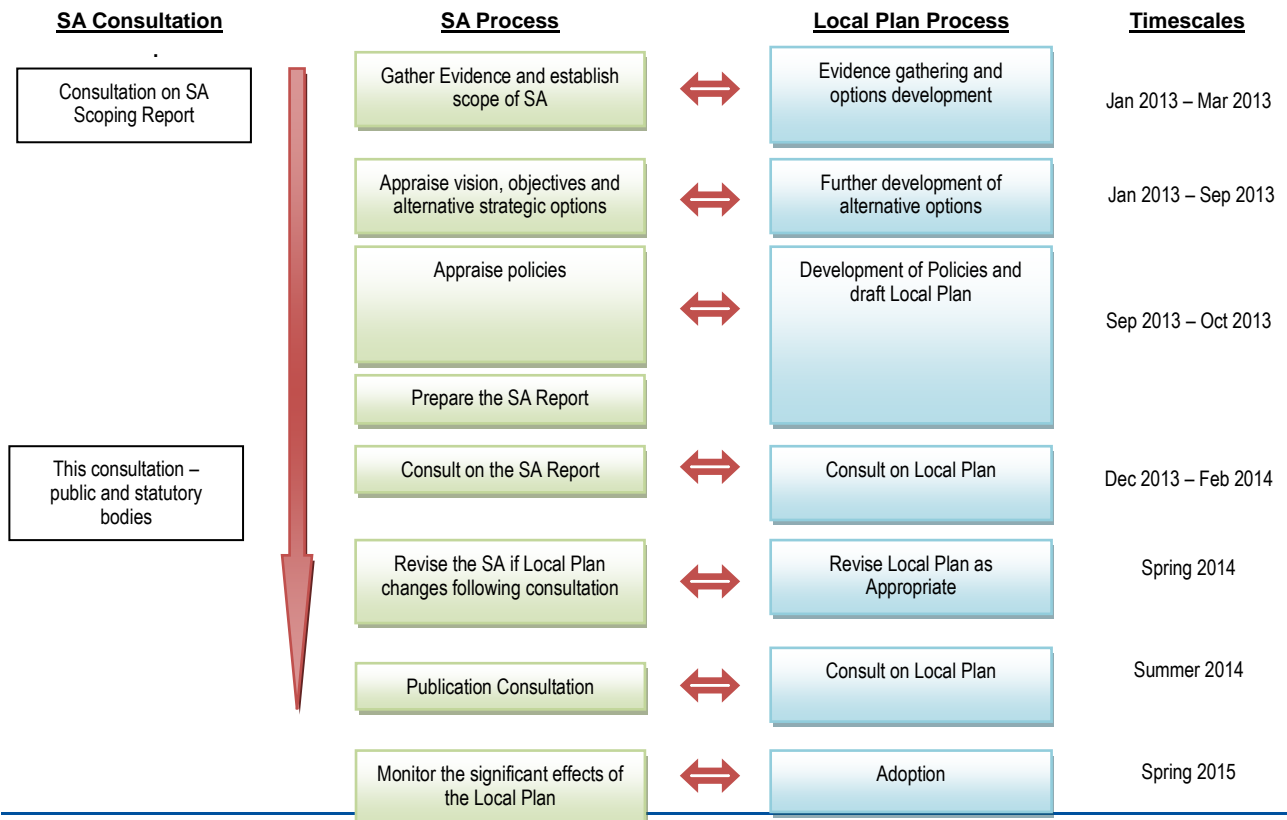
The London Legacy Development Corporation (LLDC) has prepared a Local Plan to help guide development within the Legacy Corporation area up to 2031. The Local Plan will replace existing planning policy for the Legacy Corporation area which is currently covered by four adopted Core Strategies and associated Area Action Plans (AAPs) for the London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest.

When preparing the Local Plan it is a legal requirement to undertake a Sustainability Appraisal (SA) to ensure that it is developed within the principles of sustainable development. Independent consultants Hyder Consulting Limited have undertaken the SA during the development of the Local Plan. This report provides a summary of the findings. The detailed reports can be viewed at the LLDC main office or on the website.

2 WHAT IS SUSTAINABILITY APPRAISAL?

SA is a process for assessing the social, economic and environmental impacts of a Development Plan Document as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European Strategic Environmental Assessment Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. Consultation with statutory bodies (Natural England, English Heritage and Environment Agency) and the public is also required at key stages. A high-level chart showing the SA stages undertaken alongside the plan-making stages is presented below. It also indicates the timeline and key consultation points.



3 SCOPE OF THE APPRAISAL

The scope of the SA was determined through collecting information on the environmental, social and economic characteristics of the Legacy Corporation area. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies in February 2013.

Existing characteristics and issues in the Legacy Corporation area

To ensure that a robust assessment of the Local Plan is undertaken, it is necessary to understand the existing conditions and characteristics of the Legacy Corporation area, for example, the location of key environmental features like designated historical sites, population dynamics including migration patterns, health, employment, schools capacity and the condition of housing stock and its affordability. These are detailed in the SA Report. Table 3-1 below identifies the sustainability topics covered in the SA and summarises some of the key characteristics and issues under each.

Table 3-1 Summary of key existing characteristics and issues in the Legacy Corporation area

SA Topic	Summary of key existing characteristics and issues in the Legacy Corporation area
Population	The high level of population growth anticipated in London and within the southeast boroughs are an indication why large numbers of new homes will be considered necessary within Hackney, Tower Hamlets, Newham and Waltham Forest. The 65+ group is projected to see the greatest increase in the next 25 years in the four boroughs therefore opportunities to provide appropriate housing for the elderly should be sought.
Education	There is a need to improve educational attainment across all four boroughs. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy. It should be ensured that any new residential development within the Legacy Corporation area does not put pressure on existing educational establishments.
Health	Health is generally poor when compared to the national average figures with regard to life expectancy from birth and incidences of diseases. The new developments may put pressure on existing health care facilities. Opportunities should be sought to encourage people to lead healthy lifestyles and participate in regular exercise.
Crime	Although the crime levels in the Legacy Corporation area are decreasing, there is a need to tackle anti-social behaviour across all four boroughs.
Water	The majority of rivers within the catchment are designated heavily modified and there is a distinct lack of natural river processes. The modification of rivers including in-stream structures has led to loss of habitat diversity and the creation of barriers for fish migration. Water quality also remains a significant issue. The highly urbanised nature exacerbates the pollution pressures particularly through increased surface water run-off, storm sewage overflows, alongside effluent from sewage treatment works. There are large areas within the area that are at risk of flooding from both the River Lee Navigation and the River Lee. There may be a risk of tidal flooding.
Soil and Land	Development on the Legacy Corporation area represents development on brownfield land and therefore a sustainable use of land resources. Any contaminated land encountered on the Legacy Corporation area prior to development should be remediated – which would offer benefits to soil and land resources.
Air Quality	Air Quality Management Areas (AQMAs) are designated in the four London boroughs, where the Legacy

SA Topic	Summary of key existing characteristics and issues in the Legacy Corporation area
	Corporation area is located, for exceedences in both particulate matter (PM ₁₀) and nitrogen dioxide (NO ₂).
Biodiversity	There are no nationally or internationally important ecological sites within the Legacy Corporation area. However, opportunities should be sought to maximise accessibility to nature and to consider Biodiversity Action Plan commitments.
Cultural Heritage	The Legacy Corporation area contains a large number of formally designated heritage assets. The Legacy Corporation area located within Newham is considered to be within an archaeological priority area. Cultural heritage features should be conserved and enhanced.
Landscape/ Townscape	There are no designated landscape assets within 20km of the Legacy Corporation area. However, it is essential that townscape character and quality is maintained / enhanced through high quality design, careful siting, and the incorporation of soft landscaping.
Minerals and Waste	Recycling rates saw an overall increase in all four boroughs from 2001-2011. Opportunities should be sought to enhance reuse, recycling and composting performance.
Transport	The Legacy Corporation area is well connected strategically by transport infrastructure and public transport links, making the area relatively accessible. Strategic infrastructure is established and has been previously enhanced to support the 2012 Games, with the minor exception of routes north of Stratford towards Waltham Forest. Opportunities should be sought to reduce reliance on the private car to reduce current local issues with congestion and air quality.
Economy	Levels of economic inactivity within all four boroughs are lower than regional and national levels. There are opportunities to increase employment opportunities through business clusters and Stratford City in its role as a sub-regional centre. The good transport links to the Legacy Corporation area should be exploited as accessibility is a key issue when attracting new residents / inward investment / creating employment opportunities.
Deprivation	There are a number of wards within the four boroughs that are considered to be in the bottom 20% most deprived nationally. Enhancements within the Legacy Corporation area that deliver employment opportunities, high quality new housing, improved public realm, access to nature would all benefit deprivation.
Housing	House price inflation alongside the recent recession has impacted significantly on housing affordability across London. Overcrowding is a key problem in Hackney with 10% of households being officially overcrowded. With the projected increase in population and a large projected increase in the 65+ age group in Hackney, Tower Hamlets, Newham and Waltham Forest, there will be a need for appropriate housing for the elderly.

Policy context

A review of other international, national, regional and local plans and environmental protection objectives that could influence the development of the SA and the Local Plan was undertaken and is recorded in the SA Report. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the SA and the Local Plan.

Which aspects of the Local Plan were appraised?

The following aspects of the Local Plan were appraised through the SA:

- Vision and Objectives
- Strategic Policies and Detailed Policies

- Sub Areas Policies and Site Allocations

Following the appraisal of the above, recommendations were presented to the plan-makers to adapt the choice of strategy or policy wording in order to minimise adverse effects and maximise benefits.

Development of the Local Plan and Consultation

The preparation of the Local Plan commenced in October 2012 when planning powers were transferred to LLDC and an initial consultation on 'what the Local Plan should cover' ran between 12th November and 12th December 2012. Representations received from stakeholders and the public were considered when drafting the Local Plan and the corresponding SA Report.

The SA Report and the Local Plan was consulted upon between December 2013 – February 2014 in accordance with Regulation 18 of the Town and Country Planning (Local Planning (England) Regulations 2012. Following the receipt of representations, the Local Plan has been updated to reflect the comments received. LLDC reviewed the feedback and revised the plan as appropriate. Policies which share common objectives were combined (e.g. four employment use related policies were replaced by one single *Policy B.1 Location and maintenance of employment areas*). New policies and topics were introduced taking into consideration the consultation comments and SA recommendations. For example, *Policy S6 waste reduction, recycling and composting* was included to tackle issues associated with the sustainable use of natural resources and measures to reduce noise effects were considered within *Policy BN.11 Reducing Noise and Improving Air Quality*.

This NTS presents the findings of the appraisal of the significant effects of the Local Plan including any alternatives considered during the preparation of the plan, prior to the Local Plan formal consultation in the summer of 2014, when the Publication Local Plan and the Final SA will be issued to all key stakeholders (including statutory consultees and the public).

4 APPRAISAL OF THE LOCAL PLAN AND ITS ALTERNATIVES

4.1 Sustainability Appraisal

The Vision and Objectives

There is an emphasis within the Vision for the Legacy Corporation Area to 'become an established location for working, living, leisure and culture' which would positively fulfil many social and economic SA Objectives, as creating such a place would improve local housing, encourage economic growth and increase employment opportunities. This would be particularly beneficial for surrounding areas which currently suffer with elevated levels of deprivation. Levels of deprivation would further benefit from provision of high quality education opportunities and facilities, from early years to higher education and research within the Legacy Corporation area. Ultimately the creation of neighbourhoods, with family and affordable homes, would also contribute to creating happy and healthy communities.

The Vision affirms that Stratford will be a focus for international businesses, education and research while Hackney Wick will be a global centre for creative and productive businesses, which would benefit economic growth in the Legacy Corporation area. Queen Elizabeth Olympic Park would also offer health and social benefits.

Climate change would also benefit under the Vision through promoting district, neighbourhood and local centres and creating a network of mixed urban districts which are accessible by

footpaths and cycle ways and connected to public transport hubs. This may also encourage a modal shift encouraging people to leave their private cars at home and opt for a more sustainable travel choice i.e. walking, cycling or public transport to access the Legacy Corporation area. The Vision also refers to district heating and cooling networks, which would contribute to the SA Objective on climate change.

With regard to the environment, the Vision seeks to ensure that the Legacy Corporation area provides a well-designed built environment that is readily accessible and provides areas of open space. It also refers to biodiverse landscapes and waterways, trees and urban greening, which would enhance the natural environment. For all these reasons it is considered that the Vision for the Legacy Corporation area is sustainable.

The Local Plan contains 5 Objectives to deliver the Vision. The primary focus of these objectives is the prosperity of the area through growth in business and quality jobs, delivery of housing to meet the local needs, creation of high quality natural environment, sustainable access to jobs and services including good transport connectivity, and contains clear provisions to ensure sustainable construction and appropriate infrastructure improvements. The objectives collectively therefore are considered to be sustainable.

The Policies of the Local Plan

The policies of the Local Plan are designed to guide development in the Legacy Corporation. On the whole the majority of policies contribute to the achievement of the SA Objectives. However, a number of policies were identified to detract from the SA Objectives with potential to have a negative effect if no mitigation measures are put in place.

The policies relating to Business Growth, Jobs and Lifelong Learning perform very well against the sustainability criteria used in the appraisal and would lead to both direct and indirect benefits. Direct benefits would occur in relation to improved employment opportunities, economic inclusion, long-term economic benefits and an improved education attainment for all age groups. Other indirect benefits will occur as a result of the creation of improved public realm attracting more visitors, residents and businesses, which could indirectly benefit health. Indirect benefits in terms of greenhouse gas emissions and air quality could be realised through the implementation of travel plans for new schools, and by focussing new leisure facilities in locations where public transport is available. However, it is considered that the increase of business growth opportunities may lead to increase of traffic in the area and negative effects may occur along key roads already designated as AQMAs.

Policy B.3 *Creating vitality through interim uses* will have a positive effect on townscape quality through measures aiming to mitigate the negative visual effect of derelict buildings and enhancement of the public realm.

The greatest sustainability benefits within this topic area of the Local Plan relate to economic development in appropriate locations within the Legacy Corporation area, thereby generating employment opportunities and supporting existing services and facilities (as promoted through the employment requirements policies). This could generate indirect benefits in terms of incomes and health.

The policies relating to Housing and Infrastructure Provision directly seek to ensure the provision of a range of housing types including affordable housing, ensuring both market and affordable housing needs are met, which could indirectly encourage inward investment and economic growth. Many of the policies seek to ensure access to services including by public transport which could lead to direct benefits in terms of air quality and social inclusiveness. It is ensured that the needs of specific sectors of the community such as older people and students

are met, which could provide indirect benefits for their health and well-being. Gypsy and traveller sites provision is also catered for. Although uncertainty exists to exact school provision numbers, direct beneficial effects on educational attainment will occur through the provision of school facilities primarily to meet the need of the population in new development.

The policies relating to the provision of High Quality Built and Natural Environment combine policies associated with the design of new development and policies related to the protection and enhancement of waterways, land and air quality, biodiversity and archaeology resources, open/green space and key views.

The built environment policies positively support many of the environmental sustainability criteria, particularly through the requirement for sustainable design construction of new development, maximising energy efficiency, and utilising low carbon technologies. The policies therefore directly seek to reduce carbon emissions and ensure adaptation to climate change, and indirectly contribute to a reduction in the use of natural resources and waste generation. The policies also seek to ensure that new development is well connected to amenities and community facilities, as well as integrated with the existing townscape, and does not have adverse impacts on (and where possible improves) the quality of the built and natural environment. Such provisions can offer a number of social and economic benefits, for example relating to accessible jobs and encouraging inward investment. In addition, encouraging the use of public transport, walking and cycling are also beneficial by providing opportunities for individuals to pursue healthy lifestyles. The policies clearly require the design of new development to take account of existing environmental assets and reflect local townscape. The historic environment related policies (BN1, BN9 and BN12) clearly provide for significant protection of the area's heritage assets and their settings, which can also benefit townscape character. The protection of heritage assets can also act as an important learning resource to residents, employees and tourists.

The policies relating to natural environment seek to ensure the existing green infrastructure network of the Legacy Corporation area is protected, which would indirectly benefit health and wellbeing. In addition, green infrastructure can be important green travel links (cycle routes) and enhancing these links across the Legacy Corporation area could help contribute to greater levels of walking and cycling which would have air quality, climate change as well as health benefits in the long-term. Positive environmental effects upon water resources, soil resources, biodiversity and townscape should also occur if the policies were implemented.

The policies seeking to protect Community Infrastructure and services ensure that facilities and infrastructure are available to cope with the demand that new development will generate. In addition, the policies relating to the connectivity and transport across the Legacy Corporation positively contribute a number of sustainability criteria (e.g. health, access, economy, air quality) by ensuring local services are located in areas where there is a choice of travel options (walking, cycling and public transport) and are accessible to all. Whilst the focus of the transport policies is not upon environmental issues, by ensuring that new services are well located in relation to existing centres, it may help to reduce the number of journeys made by car which could indirectly benefit air quality (although this depends upon the travel choices of individuals). Sustainable transport links would also improve access to existing services and facilities, and would encourage economic development and inclusion.

The policies within the Sustainability section of the Local Plan focus primarily on climate change resilience but also draw together wider strands of sustainability to ensure that development contributes to making the area a healthy place to live and work. Direct benefits for physical and mental health would occur due to improved access to health services, community facilities and open space. In addition, careful design of new development will increase the opportunities for walking and cycling thus encouraging people to choose healthier lifestyles. Walking and cycling will be promoted which will have a positive effect on air quality in the long term.

The energy enhancing policies contribute positively to the sustainability objectives through the promotion renewable energy generation, which could result in indirect benefits to the local economy. Measures to limit and adapt to any potential effects relating to climate change will have positive effects on air quality, flood risk and townscape through appropriate design of buildings and increased vegetation.

The policy seeking to reduce waste and reuse/recycle materials will reduce the effects of climate change and allow for sustainable use of natural resources in the long term. There is clear commitment that business growth and new housing and infrastructure developments will minimise the use of natural resources and maximises opportunities to reduce waste production. The policies relating to integrated water management focus upon protecting the area's water resources, and ensuring that flood risk is effectively managed as part of the development process. The protection of water quality is particularly important as there are a number of rivers across the Legacy Corporation area (Waterworks River, River Lee, River Roding) and there are flood risk issues associated with some localised areas that fall within Flood Zone 2 and 3. Flooding can have significant adverse effects on the economy, human health and wellbeing by affecting homes, buildings and services, and resulting in significant remedial costs. These policies would therefore indirectly benefit the local economy by reducing the risk of flooding pressure on the district's economy and services.

It is recommended that continuous air quality monitoring of areas in the vicinity of the new transport schemes or large scale developments should be undertaken to minimise any air quality effects. Safety by design principles should also be incorporated into the housing policies to ensure that crime levels do not increase as a result of the planned growth of the area.

The Sub Areas and Site Allocations

All four Sub Areas scored largely positively against the SA Objectives. Each of the Sub Areas will have a positive contribution to meeting housing demands with planned housing growth of approximately 24,000 new residential units within the plan period. The Sub Areas also seek to develop on brownfield land which will support the sustainable use of land resources.

Each of the Sub Areas' Visions holds a commitment to providing development that supports vibrancy and natural surveillance which may result in further decrease of crime levels. The creation of a new Neighbourhood Centre within Sub Area 1 and a new District Centre and Local Centre in Sub Area 4 would have positive and negative effects as it would create increased activity and natural surveillance but would also create a new target for potential criminal activity.

Three Sub Areas commit to creating educational facilities to help meet the demands of the growing populations and this includes the provision of four new primary schools and one secondary school. The provision of sport and recreational facilities in the Sub Areas will contribute to the improvement of physical health and wellbeing for all and will benefit deprived communities and encourage social inclusion.

The Stadium and the Aquatics Centre within Sub Area 3, as well as the Lee Valley Velopark within Sub Area 2, will provide a wide range of facilities which may encourage more sport activities and help to improve health, supporting the SA Objective *'To improve physical and mental health and wellbeing for and all and reduce health inequalities'*.

The Sub Areas scored positively against SA Objective *'To improve sustainable access to jobs, basic goods and amenities for all groups'*. Each of the Sub Areas is well served by bus routes and rail services. Improved connections in Sub Area 4 would help to improve access as currently railway infrastructure and a number of waterways create barriers to movement. The provision of cycle routes and further improvements to sustainable access will benefit the Sub Areas.

Development proposals within each of the Sub Areas would generate a significant number of construction and operational phase jobs as well as the increase in retail and leisure services with the creation of a new Neighbourhood Centre within Sub Area 1 and a new District Centre and Local Centre within Sub Area 4. Such development would also support SA Objective 'To encourage sustainable economic growth, inclusion and business development'. However, in the long term, an increase in energy demand resulting from completed development could result in adverse effects caused by greenhouse emissions detracting from SA Objective 'To limit and adapt to climate change'. Similarly new development would result in an increase of private cars which may negatively affect air quality; however, the promotion of sustainable travel may contribute to improving local air quality. For this reason the Sub Areas received positive and negative scores against the air quality SA Objective.

The policies included within each Sub Area score positively against SA objective 'To reduce crime, disorder and fear of crime' through improving local vitality enhancements of existing street infrastructure. Positive effects are also recorded with regards to sustainable access and improved connectivity in the majority of policies which may result in additional benefits associated with business growth and inclusion. Improvements to walking and cycling routes within the Sub Areas and links to the wider area would only benefit human health through promoting healthy lifestyles and encouraging people to walk.

The enhancement of existing passages and streets including pedestrian and cycling infrastructure is envisaged in a number of policies within all Sub Areas. The improvements of public realm will lead to direct and indirect positive effects on townscape quality and cultural heritage. Sustainable travel modes will be further promoted which will benefit objectives related to climate change and air quality in the long term. Local biodiversity will be protected and enhanced through the creation of new park, green infrastructure and urban greening.

Twenty one site allocations were identified in the Local Plan and assessed against the SA Objectives. On the whole, the majority of site allocations performed very well against housing and health objectives through the provision of a significant number of new homes and facilities to encourage healthy lifestyles. Whilst positive effects were identified with regard to improvement of educational attainment in five site allocations through the provision of a new primary school and educational facilities, uncertain scores were recorded against seven site allocations as it was unknown whether development would include the provision of educational facilities.

The provision of retail and employment floorspace and improvements to green infrastructure would help to encourage sustainable economic growth and inward investment and this will also contribute to increasing employment opportunities. Improvements to pedestrian and cycle routes will allow sustainable access for all groups which will also partially support economic growth.

Sub Areas 1 and 2 and eight site allocations support the SA Objective 'To protect and enhance biodiversity', as they provide valuable spaces for wildlife and commit to the provision of more open space and potential habitat creation. Sub Areas 3 and 4 each include areas of open space, gardens and waterways and the Greenway in Sub Area 3 and 4 is a functional green corridor and supports habitats and species protection. However, extensive development in these areas may result in the loss of habitat therefore positive and negative scores were recorded against the SA Objective.

The Sub Areas and the majority of the site allocations support the protection and enhancement of townscape character and this ties in with the protection and enhancement of cultural heritage assets as the Sub Areas seek to provide development of a high standard design which complements streetscape and is designed sensitively around cultural heritage features,.

Potential flood risk effects and water demand issues are identified within all four Sub Areas and a number of site allocations as several localised areas are prone to flooding and new development will also lead to an increase in demand for water resources. However, it is recognised that mitigation measures are envisaged in other parts of the Local Plan (Policy S5 and Policy S8).

Cumulative Effects

The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects (where the combined effects are greater than the sum of their component parts).

The assessment of the policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies would ever be implemented in isolation and the plan has to be read as a whole. The Local Plan has been assessed for its individual effects but there may be cumulative effects which could occur as a result of the policies being implemented. Potential positive cumulative effects include the following:

- Provision of better quality homes and diversity of housing types which will contribute to the long-term housing needs of the area.
- Increased business and employment opportunities.
- Improvement in educational attainment levels.
- Improvement in health.
- Improvement in access to and provision of services and facilities.
- Provision of suitable open areas for recreation.
- Improvement of public realm through open spaces provision and regeneration.

However, potential adverse cumulative effects can result from growth and development contained in policies, which include:

- Increase in use of resources from water and energy consumption.
- Loss of habitats through land take.
- Increase in landfill waste.
- Increase in road traffic in major roads and worsening of air quality from traffic generation and dust from construction activities.

4.2 Alternatives Considered

Vision, Objectives and Policies

During Stage B of the SA process a number of options were considered relating to the Vision, Objectives, and policies of the Local Plan. The preferred options and alternatives were assessed against the SA Objectives and recommendations for further development were provided. In many cases, no alternatives were considered as this would result in a policy

approach that would not be in general conformity with the London Plan or with other high tier planning documents.

On the whole, the preferred options provide a balanced approach between housing and economic growth in the Legacy Corporation area through a number of relevant policies. As a result the preferred options will provide both housing benefits for the growing population of the area (including affordable housing) and employment and investment opportunities to tackle some deprivation issues. The preferred options also performed very well against SA objectives relating to health, sustainable access and biodiversity.

Sub areas

Alternative options were also considered with regard to the identified four Sub Areas in the Local Plan and a number of Site allocations within these Sub Areas. It was recognised that certain limitations exist for considering more alternatives with regard to the proposed Sub Areas and Site Allocations as planning permissions have already been granted for the majority of sites. Each proposed site allocation was recognised as an alternative to the rest but none of the site allocations were rejected at Stage B of the SA process.

Sub Area 1

The only alternative option within the Sub Area 1 policies is related to Policy SA1.4 Heritage-led Regeneration where an alternative option would be to encourage purely residential or employment-led regeneration. It was considered more appropriate that no one use should predominate in the Sub Area in accordance with other policies in the Local Plan. The preferred option performs particularly well against the SA objectives relating to the enhancement of townscape quality and protection of cultural heritage.

Sub Area 2

Given the high level of certainty of delivery of the permitted development in the area no realistic alternative options were available for consideration. The permitted schemes are outline parameters based applications that set the limit of development extent and height, allowing sufficient flexibility in the final form of it.

Sub Area 3

An alternative option for the Sub Area 3 Vision was not to propose the extension of the existing town centre which would encompass the retail, leisure and commercial district of Westfield Stratford. It was discounted as this would weaken the case for Stratford as a whole being defined as a Metropolitan Centre within the London Plan. The sustainability appraisal showed that the alternative option is less likely to contribute to the economic objectives because it offers fewer employment and retail opportunities within the Legacy Corporation area.

Promoting only residential and subsidiary uses within the Sub Area was an alternative option for policy SA3.2 Cultural and Education facilities. The alternative was discounted as it was considered that it would not reflect the overall vision and strategy set out within the Local Plan and would not maximise the economic growth element of the plan. The preferred option will contribute to the achievement of a number of SA objectives as it is likely to result in positive effects with regard to health, education, and overall deprivation levels.

An alternative option of not permitting interim uses of land (SA3.3: Interim Leisure, Cultural and Event Uses) has been discounted as this will risk the land being unutilised and provide a poor quality environment along key routes in the area. The alternative option may result in some negative effects with regards to the economic SA objectives as the land would be underutilised

and is likely to create an unattractive business environment prior to the delivery of later phases of permanent development.

Sub Area 4

No specific alternatives were considered with regard to the Sub Area policies as these were explored and discounted through the Core Strategy preparation process in line with consultation responses, evidence and sustainability appraisal. The Legacy Corporation's vision for Sub Area 4 updates this already established approach.

Site Allocations

Alternatives were also considered and rejected with regard to some of the site allocations included in the Local Plan. An alternative option of allocating Chobham Farm South for development without the completion of a link to the town centre bridge was rejected as this link will help to improve access and the range of options for acceptable forms of development. The preferred option will result in benefits related to sustainable access to amenities. The alternative option is less likely to contribute to the achievement of the economic SA objectives because it provides limited opportunities for development of the site thus attracting less investment in the area. Moreover, it may result in worsening of the deprivation levels due to restricted access to amenities. Alternative options for Stratford Waterfront East and Stratford Waterfront West were discounted as the preferred option provides more flexibility of the final form of development which contributes to wider economic and social objectives. Positive effects were also identified with regard to health and housing supply. The alternative of only reflecting the Legacy Communities Scheme permitted floorspace scenario at Rick Roberts Way was discounted as the identification of the Gas Holder site opens the potential for a wider and more comprehensive development scenario. The preferred option performs well against objectives related to an improved education attainment, health benefits and housing supply. In addition, some positive effects on biodiversity are likely to occur through the remediation of contaminated land in the south section of the area. The alternative option will result in similar effects as the preferred option with unknown performance against the biodiversity SA objective.

'No Plan' / 'Business as Usual' Option

An option representing a 'No Plan' / 'Business as Usual' approach was also subject to the SA process as the comparison of options to a 'No Plan' / 'Business as Usual' situation is a requirement of the SEA Directive and some of the suggested alternative options include 'no policy' alternative.

In the absence of the Local Plan (and more detailed specific policies) the following effects are likely to occur:

- A greater uncertainty over the exact form of new development.
- A greater likelihood of development being less sustainable and of adverse environmental, social or economic effects occurring.
- A lower likelihood of opportunities being met in order to solve the area's existing social and economic issues. By not implementing the Local Plan, there is a greater likelihood of the district's negative trends continuing in the future.

5 MONITORING

Monitoring is an ongoing process, integral to the implementation of the Local Plan and a requirement of the SA process. The proposed monitoring framework was designed to focus mainly on significant sustainability effects identified during the SA, including effects:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

A monitoring framework is presented in the SA Report which identifies the factors that should be monitored along with the relevant key performance indicators. Monitoring should occur throughout the lifetime of the Local Plan.

6 NEXT STEPS

This Final SA Report will be issued for consultation alongside the Local Plan to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, the Legacy Corporation will review the feedback and revise the plan as appropriate through the Examination process. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the Local Plan being adopted.

The Local Plan and the SA Report may be viewed at the address below:

London Legacy Development Corporation

Level 10, 1 Stratford Place

Montfichet Road

London

E20 1EJ

Alternatively they can be viewed at the Legacy Corporation's website.