



Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

Final Scoping Report

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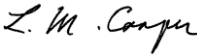
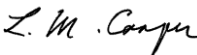


London Legacy Development Corporation

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Local Plan

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Abbreviations

AAP	Area Action Plan
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BREEAM	Building Research Establishment Environmental Assessment Method
CO ₂	Carbon dioxide
cSAC	Candidate Special Area of Conservation
DCLG	Department of Communities and Local Government
HRA	Habitats Regulations Assessment
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
NEET	Not in Education, Employment or Training
NNR	National Nature Reserve
NO ₂	Nitrogen dioxide
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
PM ₁₀	Particulate Matter
pSPA	Potential Special Protection Area
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SAP	Species Action Plan
SEA	Strategic Environmental Assessment
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
VAT	Value Added Tax

1 Introduction

1.1 Purpose of this Scoping Report

This Scoping Report has been prepared by Hyder Consulting Ltd on behalf of the London Legacy Development Corporation (LLDC) as part of the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of their emerging Local Plan. The Local Plan will eventually replace existing planning policy for the LLDC area (shown on Figure 1-1) which is currently covered by four adopted Core Strategies and associated Area Action Plans (AAPs) of the London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest. Section 2 of this report provides further information about the background to and the development of the LLDC Local Plan.

1.2 Background to the Area

On 1 October 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 LLDC is the planning authority for the Mayor's development corporation in east London which includes the Queen Elizabeth Olympic Park.

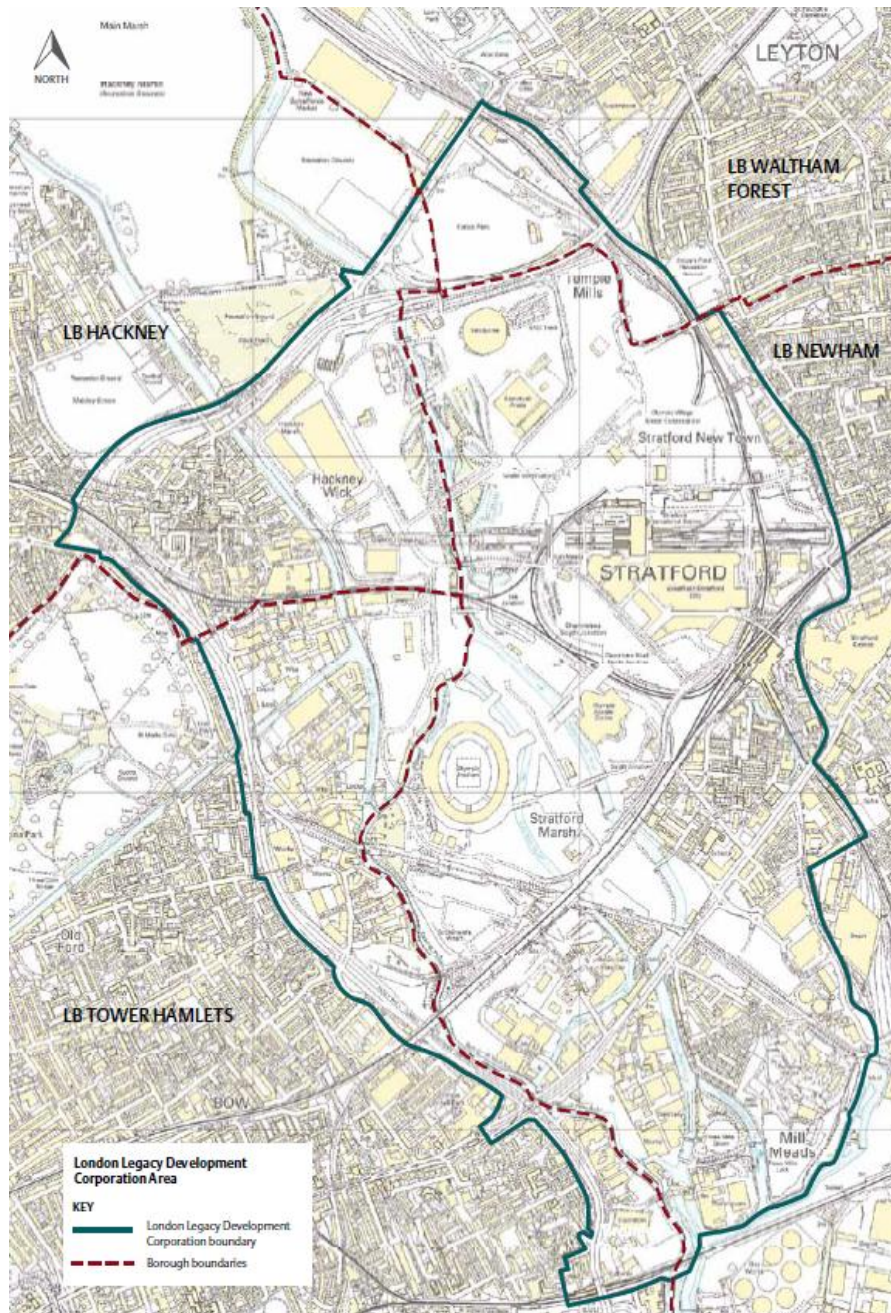
The precise area affected ('the Legacy Corporation planning boundary') includes parts of the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest and its location is presented on Figure 1-1.

The LLDC plans a £300m construction project to transform the Olympic site into the Queen Elizabeth Olympic Park. Legacy plans for the Queen Elizabeth Olympic Park include:

- Venues and Sport - the future of six of the eight permanent venues has already been secured (Aquatics Centre, Orbit, Multi-Use Arena, Olympic Village, Velodrome, Eton Manor);
- Employment - up to 8,000 permanent jobs on the park by 2030 plus 2,500 temporary construction jobs along with training and apprenticeships with a focus on opportunities for local people;
- New Neighbourhoods - Five new neighbourhoods developed over 20 years;
- Transport - anticipated to be the most accessible and connected place in Europe;
- Visitor Attraction – anticipated to become one of London's top 10 visitor destinations by 2020 attracting local, regional, national and international visitors; and
- Green Space - Over 22 miles of interlinking pathways, waterways and cycle paths and 111 acres (45 hectares) of biodiverse wildlife habitat on the Olympic Park, including reedbeds, grasslands, ponds and woodlands, with 525 bird boxes and 150 bat boxes.

The emerging LLDC Local Plan will provide the planning policy framework to deliver the vision, goals and aspirations for the LLDC area.

Figure 1-1 Location of the LLDC Area



1.3 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement that the Local Plan is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive¹ which was transposed directly into UK law through the SEA Regulations².

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

SEA is a systemic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process. Article 1 of the SEA Directive states that the aim is to:

'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'.

It is possible to combine the processes of SEA and SA, as they share a number of similarities. Guidance³ published by the Department for Communities and Local Government (DCLG) promotes a combined process (i.e. a process which assesses social, economic and environmental effects) and this is the approach that has been adopted for the Local Plan. Whilst there are formalised approaches for both SA and SEA, only SEA has a legal obligation to perform certain activities. These legal obligations have been and will continue to be adhered to throughout the combined SA and SEA for the Core Strategy. The combined SEA and SA is referred to as SA throughout the remaining sections of this Scoping Report. This Scoping Report includes a series of boxes which clearly identify the specific requirements of the SEA Directive that need to be fulfilled.

1.4 Structure of the Scoping Report

This Scoping Report sets the framework and approach for the SA process and explains how it will be undertaken for the Local Plan. Subsequent sections of this report provide information about the proposed methods and provide background information about the existing conditions within the LLDC boundary (and the four London boroughs the area is located within where relevant). Section 2 provides important information about the development of the Local Plan to date and how the LLDC intend to progress the preparation of their Local Plan. Section 2 outlines the SA process. Section 4 and Appendix A provide information about the review of other relevant plans and programmes and Section 5 and Appendix B presents data about existing conditions across the borough.

1.5 Consultation

This Scoping Report was consulted upon (between 6 February and 4 March 2013) in accordance with the requirements of Regulation 12 (5) of the SEA Regulations. The Scoping Report has, therefore, been issued to the statutory consultation bodies (Natural England, English Heritage and the Environment Agency) and other stakeholders identified by LLDC i.e. Transport for Greater London. Representations received have been incorporated into this report where relevant, details are provided at Appendix C.

1.6 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC), candidate Special Areas of Conservation (cSAC), Special Protection Area (SPA), potential Special Protection Area (pSPA) and Ramsar site), which is not directly concerned with the management

² S.I. 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations, 2004

³ <http://www.pas.gov.uk>

of the site for nature conservation, must be subject to an Appropriate Assessment. The overarching process is referred to as Habitats Regulations Assessment (HRA).

A draft HRA Scoping report has been prepared and this will be consulted on during the scoping consultation for the SA.

A HRA screening exercise will commence when the options are developed for the Local Plan to determine whether the Local Plan (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England. At this stage in the Local Plan's development, evidence gathering for the HRA Screening Report has commenced and liaison will occur with Natural England during the process. If the Screening Report identifies that significant effects are likely then the Local Plan must be subject to Appropriate Assessment.

2 The LLDC Local Plan

2.1 Background

The emerging LLDC Local Plan will eventually provide the local planning authority's policies for meeting the economic, environmental and social aims of the area where this affects the development and use of land. The Local Plan together with the London Plan will guide development within the LLDC area. The LLDC area boundary is presented on Figure 1-1.

2.2 Development of the Local Plan

The development plan for the LLDC area currently comprises the London Plan and the Local Development Documents of the constituent London boroughs of Newham, Hackney, Waltham Forest and Tower Hamlets. Until the Legacy Corporation has prepared planning policy for the new local planning authority area, planning applications will be determined in accordance with the existing development plan.

However, the LLDC is currently preparing their Local Plan which will set out planning policies that will guide future development within its administrative boundary, and which will be used in the determination of future planning applications.

2.3 Previous Consultation on the Local Plan and Programme

The preparation of the LLDC Local Plan commenced in 2012 and an initial consultation on 'what the Local Plan should cover' ran between Monday 12th November and Monday 12th December 2012. Representations received from stakeholders and the public alike will be considered when drafting the Local Plan and the corresponding SA Report.

Table 2-1 presents an indicative programme for the emerging LLDC Local Plan and future consultation dates.

Table 2-1 Indicative Programme for the LLDC Local Plan

Stage / Element of the Local Plan	Date
Nov – Dec 2012	Consultation on what the Local Plan should cover
Jan – June 2013	Development of draft policies, proposals and designations that will form the Local Plan taking views and information provided into account
September 2013	Informal consultation on the draft Local Plan
February to April 2014	Formal publication and consultation period for the Local Plan
July to September 2014	Independent examination of Local Plan by a planning inspector
January 2015	Formal adoption of the Local Plan

2.4 Structure of the Local Plan

The Local Plan will include:

- An outline of the key issues facing the area i.e. a 'spatial portrait'.
- A vision for how the area should look in 2030, with strategic level supporting objectives.
- The strategic direction of future growth in the area, including the identification of strategic sites which are key to the delivery of the vision, and a suite of place-based policies which will describe how key locations will be expected to change over time.
- A set of issues-based policies which will be used in the determination of planning applications, covering issues such as design and affordable housing requirements.
- A delivery and monitoring strategy which will address implementation as well as the Legacy Corporation's approach to managing risks and contingencies.

When adopted, the LLDC's Local Plan will form part of the Development Plan for the area, alongside the London Plan.

3 Strategic Environmental Assessment and Sustainability Appraisal

3.1 Stages in the SA Process

Government Guidance subdivides the SA process into a series of stages. Whilst each stage consists of specific tasks, the intention should be that the process is iterative. Table 3-1 presents the key stages in the SA process and indicates where specific tasks have been addressed in this Scoping Report. The table also demonstrates how each of the SA stages is linked to the preparation and development of the LLDC Local Plan.

Table 3-1 Stages in the SA Process

SA Stage	Section of the Report	Application to the Local Plan
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope		
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	Section 4	<p>Stage A corresponds to the scoping stage of the SA and the findings of this stage are presented in this Scoping Report.</p> <p>During this stage the scope of the Local Plan has been defined.</p> <p>The purpose of this Scoping Report was to seek feedback on the scope of the SA.</p>
A2: Collecting baseline information	Section 5	
A3: Identifying sustainability issues and problems	Section 5	
A4: Developing the SA Framework	Section 6	
A5: Consulting on the scope of the SA	Purpose of this Scoping Report is to seek feedback on the scope of the SA.	
Stage B: Developing and Refining Options and Assessing Effects		
B1: Testing the Local Plan objectives against the SA Framework	All of these stages will be documented in the SA Report.	<p>Stage B of the SA process is linked to the overall production of the Local Plan which includes the development of options and the selection of the preferred option.</p> <p>There should be a considerable degree of interaction between the plan-making and SA teams during this stage in the process to enable potential adverse effects of the Local Plan to be avoided/minimised and potential sustainability benefits maximised.</p> <p>All of these stages will be documented in the SA Report.</p> <p>Proposed measures to monitor the Local Plan would be documented in the SA Report.</p>
B2: Developing the Local Plan Options		
B3: Predicting the effects of the Local Plan		
B4: Evaluating the effects of the Local Plan		
B5: Considering ways of mitigating adverse effects and maximising beneficial effects		

SA Stage	Section of the Report	Application to the Local Plan
B6: Proposing measures to monitor the significant effects of implementing the Local Plan		
Stage C: Preparing the SA Report		
C1: Preparing the SA Report	This will result in a SA Report documenting the effects of the Local Plan and will also include an assessment of the options considered during the Local Plan's development.	The draft Local Plan will be prepared ready for consultation. A SA Report and Non-Technical Summary (NTS) documenting the effects of the Local Plan will be prepared and will also include an assessment of the options considered during the Local Plan's development.
Stage D: Consultation on the draft Local Plan and the SA Report		
D1: Public participation on the proposed submission documents	-	The SA Report and the draft Local Plan will be consulted upon.
D2(i): Appraising significant changes resulting from representations	-	Following the receipt of representations, the SA Report and NTS will be updated to reflect comments received.
Examination in Public		
D2:(ii) Appraising significant impacts resulting from representations	-	Following the receipt of representations, the SA Report will be updated to reflect comments received.
D3: Making decisions and providing information	-	This stage will be undertaken by the LLDC
Stage E: Monitoring the significant effects of implementing the Local Plan		
E1: Finalising aims and methods for monitoring	Monitoring will commence once the Local Plan has been adopted.	Specific monitoring for the Local Plan will be undertaken by the LLDC.
E2: Responding to adverse effects		

4 Review of Relevant Plans, Programmes and Environmental Objectives

4.1 Introduction

The box below stipulates the SEA Directive requirements for this stage of the process.

Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives

The SEA Directive requires that the SEA covers:

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

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

A review of other plans and programmes that may affect the preparation of the Local Plan was undertaken in order to contribute to the development of both the SA and the Local Plan. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identification of any baseline data relevant to the SA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the emerging Local Plan.

The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised below with further details presented in Appendix A.

4.2 International Plans and Programmes

A review was undertaken of key International Conventions and European Directives that could potentially influence the development of the Local Plan and the SA. European Directives are transposed into national legislation in each individual Member State and, therefore, there should be a trickle-down effect of the key principles and an application to the relevant national, regional and local circumstances in other planning documents.

4.3 National Plans and Programmes

A review was undertaken of relevant White Papers, plans and strategies. One of the most important documents reviewed was the UK Sustainable Development Strategy⁴ which outlines

⁴ UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

the over-arching Government objective to raise the quality of life in our communities.

Central Government establishes the broad guidelines and policies for a variety of different topics which are now brought together in the National Planning Policy Framework (NPPF). The NPPF streamlines national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.

It sets national priorities and rules only where it is necessary to do so. It aims to ensure that planning decisions reflect genuine national objectives - such as the need to safeguard the natural environment, combat climate change, and to support sustainable local growth - while allowing for local authorities and communities to produce their own plans, reflecting the distinctive needs and priorities of different parts of the country. The principle of sustainable development is at the heart of the NPPF.

The NPPF guidance is structured around the following sections:

- Building a strong, competitive economy;
- Ensuring the vitality of town centres;
- Supporting a prosperous rural economy;
- Promoting sustainable transport;
- Supporting high quality communications infrastructure;
- Delivering a wide choice of high quality homes;
- Requiring good design;
- Promoting healthy communities;
- Protecting Green Belt land;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment;
- Conserving and enhancing the historic environment;
- Facilitating the sustainable use of minerals;
- Plan-making; and
- Decision-taking.

4.4 Regional and Sub-Regional Level Plans

A wealth of different plans and strategies have been produced at the regional (London) and sub-regional (East London / North London) level covering a variety of topics including; housing; economic development and performance; climate change (including flood risk); renewable energy; innovation; rural development; waste management; accessibility; equality and diversity; health; waste; cultural provision and diversity; and physical activity. All of the objectives of these plans as well as some of the challenges they raise need to be taken on board and driven forward by the borough as appropriate. However, it must be noted that the overarching goals of some of these plans and strategies may be outside the remit of the Local Plan which forms only an individual part of a number of different vehicles trying to deliver regional and sub- regional targets.

The Localism Act was granted Royal Assent on 15th November 2011. This Act seeks to rescind some regional planning documents. However, regional level plans such as the London Plan (2011) have been included within the review along with relevant objectives and targets, as the Plan remains in force.

4.5 Local Policy

Plans produced at the local level specifically address issues relating to the economy; health; safety; tourism; sustainable communities; housing; employment; and physical activity. The Local Plan and the SA should draw from these documents and transpose their aims in their policies and proposals. These local policy plans have been instrumental in the development of the SA Framework (refer to Section 6). These plans should in theory have included the main influences of international, national, regional and county level plans through the 'trickle-down effect'. They should also provide more of a local focus for the LLDC area. It is, through identifying these themes and incorporating them into the Local Plan that synergies can be achieved with other relevant documents.

4.6 Key Results from the Review

There were many common themes emerging through the review of plans, programmes and environmental protection objectives. Whilst specific results relating to each document are presented in Appendix A, the list below provides a summary of the main themes and issues identified:

- The need to reduce greenhouse gas emissions and increase energy efficiency.
- The need to ensure that new housing development meets local needs (for all sections of society). This is a particularly important issue in London where affordable housing issues are particularly prevalent (refer to Section 5 for further details).
- The need to protect and enhance vibrancy.
- Promoting convergence and community participation.
- The need for the protection and enhancement of the quality and character of urban areas.
- Recognising the need for the townscape to evolve and for development to be appropriate to townscape setting and context.
- The need to conserve and enhance biodiversity as an integral part of economic, social and environmental development.
- The need to protect and enhance the historic environment.
- The need to promote sensitive waste management.
- The need to promote more sustainable transport choices and to improve accessibility.
- The need to promote the use of renewable energy and renewable technologies in appropriate locations.
- Recognising the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life.
- The need for prudent use of natural resources.
- The need to promote and protect the water environment including issues such as quality and resource use.
- To need to protect and enhance air quality.
- The need to promote community cohesion and to establish communities where individuals want to both live and work.
- The need to adapt to the threat posed by climate change.
- The need to protect and enhance biodiversity resources.

- The need for long-term sustainable patterns of development that provide for the economic and social needs of all populations.
- The need to reduce crime and fear of crime.
- The need to protect and enhance ecosystem functions and services.
- Raising levels of health and well-being and promoting greater levels of physical activity.
- Establishing a housing market that meets the needs of all residents.
- Promoting sustainable economic development and a range of employment opportunities that meet the needs of all sectors of the population and all skills levels.
- Promoting high levels of equality and inclusion.
- Promoting higher levels of design quality.

The European Spatial Development Perspective identified a potential conflict that is likely to prevail in all countries, irrespective of their location and this concerns balancing the social and economic claims for spatial development with an area's ecological and cultural functions to ensure that the most sustainable patterns of development are achieved. Through the SA process and the inclusion of suitable sustainability objectives, indicators and targets, it should be possible to identify where potential issues and conflicts may arise and to develop suitable policy modifications and mitigation measures.

5 The Sustainability Baseline and Key Sustainability Issues

5.1 Introduction

Box 2 defines the SEA Directive requirements for this element of the process.

Box 2: SEA Directive Requirements for Baseline Data Collation

The SEA Directive requires that the SEA covers:

'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))

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

5.2 Methodology

Characterising the environmental and sustainability baseline, issues and context is an essential part of developing the SA Framework. It comprises the following key elements:

- Characterising the current state of the environment of the borough including social and economic aspects; and
- Using this information to identify existing problems and opportunities that could be considered in the Local Plan.

The environmental, social and economic baseline was characterised through the following methods:

- Review of relevant local, regional and national plans, strategies and programmes; and
- Data research based around a series of baseline indicators developed from the SEA Directive topics (biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape), Government Guidance, previous consultation recommendations from other SAs and the data available for the borough. Data was also collated for additional socio-economic topic areas including deprivation, housing and employment to ensure that a broad range of environmental, social and economic issues were considered.

The collation of baseline data also enabled the identification of key sustainability issues and opportunities affecting the LLDC area.

Appendix B summarises the key baseline trends across the borough. Each section is subdivided to present the following:

- The baseline indicators that have been used (some are also contextual indicators and may not actually form part of the SA Framework).
- Descriptive text, graphs and statistics about the borough.
- Key data gaps.

Key sustainability issues and opportunities identified from the baseline review are detailed in Section 5.3.

The SEA Directive requires 'material assets' to be considered within the SA. Material assets refer to the stock of valuable assets within a study area and can include many things from valuable landscapes, natural and cultural heritage through to housing stock, schools, hospitals and quality agricultural land. It is considered that the material assets of the borough are appropriately covered in the following baseline sections, and consequently will not be repeated as a separate section:

- Biodiversity, flora and fauna.
- Soil and land quality.
- Cultural heritage.
- Landscape.
- Housing.
- Transportation.

5.3 Key Sustainability Issues and Opportunities

5.3.1 Population

- Tower Hamlets showed the highest growth in population observed within England and Wales between 2001 and 2011 and the third highest population density in London in 2010.
- Newham had the second highest population growth of all the boroughs within England and Wales.
- Hackney had the fourth highest population growth within England and Wales in 2011 and was the fourth most densely populated borough in 2010. Between 2010 and 2035; the population of the borough is projected to increase by 30.0%.
- The high level of growth anticipated within Hackney, Tower Hamlets, Newham and Waltham Forest are an indication why large numbers of new homes will be considered necessary within the boroughs.
- The 2011 Census revealed the population of all four boroughs continues to be heavily skewed towards the 25-29 age cohort.
- It should be ensured that the needs of all including ethnic minorities such as Black or Black British and Asian or Asian British (main ethnic minorities within Hackney, Tower Hamlets, Newham and Waltham Forest) are met in new development such as appropriate services provision, education, housing etc.
- 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.

5.3.2 Education and Qualifications

- Educational attainment across Hackney and Waltham Forest is below the regional and national average. However, educational attainment across Newham and Tower Hamlets is higher than England averages although lower than the London average.
- The percentage population holding National Vocational Qualification (NVQ) Level 4 or above in Hackney and Tower Hamlets is higher than both regional and national levels and for Newham and Waltham Forest, levels are lower than the regional percentage but higher than the national percentage.

- 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.
- Those not in education, employment, or training (NEETs) % of 16 – 18 year olds in Hackney and Waltham Forest is lower than that for Newham and Tower Hamlets, however, higher than that for London.
- It should be ensured that any new residential development on the LLDC area does not put pressure on existing educational establishments.
- Opportunities to incorporate work based learning / training should be incorporated into the LLDC development where possible. These opportunities could also be linked to the colleges and universities within the four boroughs the LLDC area is located within.
- It should be ensured that new high quality educational establishments are developed on the LLDC area if there are capacity problems with existing schools.

5.3.3 Health

- Life expectancy from birth for males in 2008-2010 in Hackney is lower than the national average and life expectancy from birth for females is slightly higher than national averages. Life expectancy from birth for males and females in 2008-2010 in Tower Hamlets, Newham and Waltham Forest are all lower than the national average.
- Levels of teenage pregnancy (15-17) in Hackney, Newham and Waltham Forest are higher than regional and national levels and which has implications for health service provision, housing and educational attainment.
- The percentage of people engaging in regular sport or exercise in Tower Hamlets is higher than regional and national averages; however, the percentage of people engaging in regular sport or exercise in Hackney, Newham and Waltham Forest is lower than regional and national averages.
- It should be ensured that new development does not lead to capacity issues with existing local health care facilities and gaps in health care provision are identified.
- There is a need to reduce the incidence of diseases and health inequalities. There are opportunities to contribute to reducing this through the Plan and thus creating a happy, healthy sustainable community on the LLDC area.
- Opportunities should be incorporated into design guidelines for LLDC developments to encourage people to lead healthy lifestyles and participate in regular exercise.
- Sustainable transport such as the use of buses, the DLR, walking and cycling should be maximised within the LLDC area in order to access employment, nature, essential services and facilities.
- New health care facilities should be developed on the LLDC area if new development leads to pressure on existing facilities although it should be noted that proposed large developments are providing facilities.

5.3.4 Crime

- The overall crime rate in Tower Hamlets, Newham and Waltham Forest have decreased by 1.6, 7.8 and 3.1 crimes per thousand respectively from 2009-2010 to 2011-2012.
- The type of crime with the highest rate in 2010-2011 in Hackney, Tower Hamlets Newham and Waltham Forest was violence against a person.
- The number of wounding or other acts endangering life offences overall increased significantly across all four boroughs in 2010-2011.

- There is a need to tackle anti-social behaviour across all four boroughs.
- Opportunities to reduce fear of crime should be incorporated into the design of new development at the LLDC area through promoting social inclusion, permeability and increasing natural surveillance.
- Secured by design principles should be incorporated into any new development at the LLDC area.

5.3.5 Water

- There are two main water features within the LLDC boundary the River Lee and the Lee Navigation along with smaller watercourses and ponds which may impose constraints on future development. However, a positive relationship can exist between developments and waterways as watercourses can be an important asset / key feature in developments.
- The River Lees current ecological quality is considered to be 'moderate' and predicted to remain 'moderate' by 2015. However, improving marginal habitats is recognised as being necessary for heavily modified water bodies to reach good ecological potential. Therefore opportunities should be maximised.
- The London catchment which the LLDC area lies within is highly urbanised with Greater London situated at the heart. 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. Examples include in-stream structures in the Lee Navigation and Lee Flood Relief Channel. Water quality also remains a significant issue in this catchment. The highly urbanised nature exacerbates the pollution pressures particularly through increased surface water run-off, storm sewage overflows and misconconnections, alongside effluent from sewage treatment works. These issues, the presence of invasive species and physical modification pressures, give rise to poor water quality and habitat diversity for a number rivers, as well as varied biological quality throughout the catchment. However, legacy development provides the single biggest opportunity to improve the lower reaches of the River Lee and its backwaters.
- There are large areas within the area that are at risk of flooding from both the River Lee Navigation and the River Lee (that pass through the site). There may be a risk of tidal flooding.
- Opportunities to maintain, repair and replace flood defences within the LLDC area should be maximised.
- Surface water and groundwater flood risk is also considered to be an issue within the LLDC area.
- New development can further intensify water run-off rates due to the uses of impermeable surfaces such as concrete and tarmac during construction. Predicted increases to the level of rainfall received, and intensity along with levels of new development could thus combine to potentially increase the risk of flooding in future.
- New developments and households within the LLDC area need to recognise they fall within a 'water stressed' area and should be encouraged to minimise water use and to re-use rainwater where possible i.e. through incorporating water efficient fixtures and fittings, incorporating rainwater harvesting technology and using grey water recycling systems. Discussions regarding water resources availability for new developments should be undertaken with Thames Water.
- Areas at risk from flooding should be protected from development that would increase that risk. New development should be encouraged to use Sustainable Drainage Systems (SuDS) to manage runoff and further reduce flood risk.

- Environment Agency maps show that the LLDC area is underlain by a secondary aquifer which stores groundwater (e.g. the Lambeth Group – clay, silt and sand) and Source Protection Zones 1 and 2 indicate the presence abstraction points for water supply at Old Ford and Stratford Box. Therefore, it should be ensured that groundwater quality is protected particularly during any construction works.
- Opportunities to maximise the use of waterways within the LLDC area for leisure, freight, waste and construction should be sought. Improvements were made at the Three Mills Lock to enable larger barges to enter the LLDC areas waterways network, and were actively used for the construction of the Olympic Park.

5.3.6 Soil and Land Quality

- The LLDC area is largely located on non- agricultural urban land. However, the Agricultural Land maps appear to show part of the north east of the area is located on Grade 4 Agricultural land (poor quality).
- There are four historic landfill sites located within the LLDC boundary.
- Development on the LLDC area represents development on brownfield land and therefore a sustainable use of land resources.
- Any contaminated land encountered on the LLDC area prior to development should be remediated – which would offer benefits to soil and land resources.

5.3.7 Air Quality

- Air Quality Management Areas (AQMAs) are designated in the four London boroughs, where the LLDC area is located, for exceedences in both particulate matter (PM₁₀) and nitrogen dioxide (NO₂).
- Encouraging the use of sustainable modes of transport to access the LLDC area would only benefit local air quality over the long term.

5.3.8 Energy and Climate Change

- New developments should be encouraged to include sustainable design principles, energy efficiency and the incorporation of renewables e.g. the inclusion of solar panels, PV technology and low carbon technologies. The carbon footprint of new development should also be reduced.
- There is a need to expand Heat Networks in the area.
- New development should seek to contribute to the London carbon dioxide (CO₂) reduction targets.
- The local plan should recognise the importance of adaptation to climate change through ensuring flood risk resistance and resilience measures are incorporated into new developments along with the use of green infrastructure and sustainable construction techniques e.g. ensuring populations keep cool during rising temperatures by locating houses at the correct orientation, using insulation, shutters, shading etc.

5.3.9 Biodiversity, Flora and Fauna

- London itself and the surroundings of the LLDC area are surprisingly green city (approximately 48% of London is surfaced in vegetation, rivers and still waters). Red Path Wood and the Lee Valley Sites of Importance for Nature Conservation (SINCs) are located immediately north of the area boundary.

- Tower Hamlets Cemetery Park is located approximately 720m southwest. However, the closest nationally important ecological site is Walthamstow Marshes Site of Special Scientific interest (SSSI), which is approximately 2.2km northwest and the closest internationally important site is Epping Forest SAC located approximately 3.1km northeast.
- The London Borough of Newham's Biodiversity Action Plan identifies two areas within the LLDC area considered to have deficient access to nature; therefore opportunities to maximise accessibility to nature should be incorporated into any new development.
- There is a need to consider Biodiversity Action Plan commitments.
- The watercourses within the LLDC area are assigned a unique reference number and are currently classified (with regards to the WFD) as follows:
 - River Lee, from Tottenham Locks to the Tideway (GB106038077852) - current status is moderate.
 - River Lee Navigation, tidal section (GB70610068) - current status is moderate.
 - Regents Canal, lower section (GB70610510) - current status is moderate.

All these watercourses are classed as heavily modified and the target is to reach good ecological potential by 2027. Opportunities should also be sought to ensure there is no deterioration in a current water body status as a result of development or policy approach.

- Opportunities to enhance biodiversity habitats should be maximised. Opportunities, where possible, should be sought to develop new and enhance a network of public open space, green grid infrastructure and blue ribbon network within the LLDC area. In addition, other opportunities should be sought to retaining existing habitats, such as water features, as they provide habitats for local species.
- Opportunities should be sought to not limit the protection and enhancement of biodiversity and green infrastructure to the Queen Elizabeth Olympic Park, but the whole of the LLDC, through the delivery of biodiverse habitats and green infrastructure (including in the built environment).
- Opportunities to align the Local Plan with the revised Local Biodiversity Action Plan and Green Infrastructure Strategy should be maximised.

5.3.10 Cultural Heritage

- Hackney, Tower Hamlets, Newham and Waltham Forest are home to a wealth of heritage assets including those of a national importance. These include Listed Buildings and Conservation Areas within the area boundary and Registered Historic Parks and Gardens and Scheduled Ancient Monuments located within close proximity to the LLDC area.
- The LLDC area located within Newham is considered to be within an archaeological priority area.
- Opportunities should be sought to conserve the setting of Listed Buildings within and adjacent to the LLDC boundary. In addition, it is important to ensure that the wider historic landscape is protected and that cultural heritage issues are taken into consideration.
- As expressed in the National Planning Policy Framework the setting of a heritage asset can contribute to its significance. Therefore opportunities to enhance and better reveal the significance of heritage assets, through responsive developments within the setting of heritage assets should be maximised.
- Cultural heritage features should be conserved and enhanced. In addition measures to protect / enhance heritage assets identified to be 'at risk' should be included within the Local Plan.

5.3.11 Landscape

- There are no designated landscape assets (i.e. AONBs or National Parks) within 20km of the LLDC area.
- It is essential that townscape character and quality is maintained / enhanced through high quality design, careful siting, and the incorporation of soft landscaping.
- There are opportunities to incorporate open green corridors and attractive green areas within the LLDC area.
- Locally protected views ((i) from Stratford City and (ii) from the Athletes' Village to Cobham Farm to the Velodrome) should be protected.

5.3.12 Minerals and Waste

- The residual waste per household in Hackney, Tower Hamlets and Waltham Forest was less than the regional average.
- Recycling rates saw an overall increase in all four boroughs from 2001-2011.
- Opportunities should be sought to enhance reuse, recycling and composting performance. Percentage of household waste sent for reuse, recycling or composting needs to be increased for all the boroughs, particularly in Newham where the rate for 2010-2011 was 14.9%.
- Opportunities should be sought to reuse materials and incorporate recycled construction materials into new development.
- Opportunities to maximise the use of waterways within the LLDC area for transporting waste should be sought.

5.3.13 Transportation

- The LLDC area appears to be 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 Olympic and Paralympic Games, with the minor exception of routes north of Stratford towards Waltham Forest
- Stratford regional and international, Pudding Mill Lane DLR and Hackney Wick London Overground stations are located within the LLDC area.
- Hackney has one of the highest rates of cycling in London, having increased by 70% in recent years.
- A significant proportion of the population within the four boroughs drive to work via car / van.
- Opportunities should be sought to reduce reliance on the private car to reduce current local issues with congestion.
- Opportunities should be sought to promote cycling / walking through new development delivered on the LLDC area as this would also indirectly benefit health. This could be achieved through developing a network of high quality cycle / footpath routes that connect the area to the surrounding areas.
- Opportunities to use the Green Infrastructure Strategy (which is currently under revision) as a blueprint for the direction of travel in the LLDC area, linking it up with other Green Infrastructure and biodiversity assets in neighbouring authorities should be sought.
- There are opportunities to significantly promote rail travel on the LLDC area due to the presence of a range of stations within the area.

- There are opportunities to promote the use of bus services within the local travel context.
- Opportunities to maximise the use of waterways within the LLDC area for leisure, freight, waste and construction should be sought. Improvements were made at the Three Mills Lock to enable larger barges to enter the LLDC areas waterways network, and were actively used for the construction of the Olympic Park.

5.3.14 Economy

- The economic activity rates for Hackney, Tower Hamlets, Newham and Waltham Forest are all lower than regional and national levels.
- Levels of economic inactivity within all four boroughs are higher than regional and national levels.
- There are opportunities to enhance the role of Stratford City as a sub-regional centre and Hackney Wick as a neighbourhood centre.
- There are opportunities to increase employment opportunities through other employment hubs (such as the International Broadcasting Centre) in the area. The good transport links to the LLDC area should be exploited as accessibility is a key issue when attracting new residents / inward investment / creating employment opportunities.

5.3.15 Deprivation and Living Environment

- There are a number of wards within Hackney, Tower Hamlets, Newham and Waltham Forest that are considered to be in the bottom 20% most deprived nationally.
- Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised. Enhancements on the LLDC area that deliver employment opportunities, high quality new housing, improved public realm, access to nature would all benefit deprivation.

5.3.16 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.
- If new housing is to be delivered on the LLDC area, consideration should be given to the considerable need within all four boroughs of affordable housing.
- Housing regeneration (if incorporated on to the LLDC area) presents a significant opportunity both to revitalise the housing stock and to improve quality of life. In addition, housing regeneration should also include should retrofitting for climate change and water resource reduction.
- The population growth in London and need for housing should be considered when providing housing in the LLDC area.

5.3.17 Transboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment

migration and commuting, service provision and education can all result in flows of people across Local Authority boundaries. In order to help to characterise the baseline further, some of these key 'transboundary' issues have been identified below.

- There is not enough affordable housing being constructed in London to meet current demand; and as the number of households in London grows, demand for affordable housing will increase. In addition, there is generally a shortage of family sized housing within the four London boroughs the LLDC area is located. These issues may be exacerbated in future years if trends remain the same. There are therefore opportunities for the LLDC Local Plan to contribute to reducing this trend.
- Fluvial flood risk in Hackney Wick also affects the London Borough of Hackney and a smaller area of the London Borough of Tower Hamlets, therefore, there is a transboundary issue. Hackney's Level 2 Strategic Flood Risk Assessment identified a possible flood alleviation scheme involving a sheet piled flood defence along the Lee Navigation within both boroughs, with a compensatory flood storage area upstream in Hackney Marshes.
- Surface water flood risk and the measures to manage this may also be a transboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. LLDC need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations.
- Employment and economic activity rates within the four boroughs the LLDC area is located in are a significant issue (particularly if Canary Wharf is removed from the equation), which may discourage new business from locating within the LLDC area.
- Open space is declining across London due to pressures from developers; therefore this is important that the LLDC Local Plan incorporates open space.
- Cumulative impacts regarding major roads should be considered.

6 The SA Framework

6.1 Background to the SA Framework

The SA Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of Sustainability Objectives, they are a recognised tool for undertaking the assessment and are aspirations/goals that an authority/organisation should work towards achieving.

The Sustainability Objectives are separate from the Local Plan Objectives, although there may be some overlaps between them. To help measure the performance of the Local Plan components against the Sustainability Objectives, it is beneficial if they are supported by a series of indicators and targets. Baseline data should be collated to support each of the indicators, as this provides a means of determining current performance across the LLDC area and gauging how much intervention or the extent of work needed to achieve the targets that have been identified. The following sections provide further details about the development of the SA Framework.

6.2 Development of the Sustainability Objectives

The Sustainability Objectives should be developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issue and opportunities.

Table 6-1 presents the proposed objectives, indicators and targets that will be used in the assessment of the Local Plan and its options. Where possible, the indicators selected link to those used to describe the baseline conditions across the LLDC area, as an understanding of the existing conditions is needed to inform the assessment. Each of the Sustainability Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process.

Targets included in Table 6-1 will need to be reviewed throughout the SA process to take account of updates and the development of new, more challenging targets.

It should be noted that quantitative targets have been developed for very few indicators for the borough. Table 6-1 also draws from many targets identified in the Sustainable Community Strategy which are largely directional targets. Throughout the course of the SA, quantified targets should be identified where possible to supplement this framework in liaison with the LLDC.

Table 6-1 SA Objectives, Indicators and Targets

SA Objective and Sub-Objectives	Indicators	Targets	Source
1. To reduce crime, disorder and fear of crime			
<ul style="list-style-type: none"> ▪ To reduce levels of crime ▪ To reduce the fear of crime ▪ Improve environmental safety (street lighting, visibility etc) ▪ To avoid the creation of isolated places during day and night ▪ To reduce levels of anti-social behaviour and improve safety for children and young people ▪ To encourage secured by design 	<p>Crime rates per 1,000 of the population for key offences.</p> <p>Number and distribution of wards with Lower Super Output Areas (LSOAs) in the bottom 10% most deprived for crime deprivation.</p> <p>Percentage of residents feeling safe after dark</p>	<p>To reassure the public, reduce the fear of crime and anti-social behaviour.</p> <p>To reduce anti-social behaviour.</p> <p>To improve community safety for young people both as victims and offenders.</p> <p>Reduce the number of wards with LSOAs in the bottom 10% most deprived.</p> <p>Improve levels of satisfaction with the way the Police and local Council deal with antisocial behaviour.</p> <p>44,000 fewer people are affected by reported burglaries.</p>	<p>Hackney Safer Cleaner Community Safety Partnership Plan 2011 – 2014</p> <p>Tower Hamlets Community Safety Plan 2012/2013</p> <p>Safer Newham Crime and Disorder Reduction Partnership Strategic Assessment 2011-2012</p> <p>Waltham Forest Safety Net Strategic Assessment (2010)</p> <p>2010 Indices of Multiple Deprivation</p> <p>In addition to individual authorities Place Surveys.</p> <p>Olympic Legacy Supplementary Planning Guidance (2012)</p>
2. To improve levels of educational attainment for all age groups and all sectors of society			
<ul style="list-style-type: none"> ▪ To increase levels of participation and attainment in education for all members of society ▪ Set mechanisms in tackling lower levels of attainment and specific barriers to certain disadvantaged groups pursuing higher education 	<p>Percentage of 15 year old pupils in local authority schools achieving five or more GCSEs at Grades A* - C or equivalent.</p> <p>Number of wards in the bottom 10% for education, skills and training deprivation.</p> <p>Percentage of people aged 16-74 achieving NVQ level 4/5.</p>	<p>Reduce number of 16-18 year olds who are NEET.</p> <p>To have the same proportion of the population with no qualifications as the England average, and to eliminate major sub-regional variations and variations between key groups.</p> <p>To improve basic training, qualifications and skills to meet the needs of employers.</p>	<p>Office for National Statistics</p> <p>Department for the Environment</p> <p>Olympic Legacy Supplementary Planning Guidance (2012)</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<ul style="list-style-type: none"> ▪ To improve the provision of education and training facilities, particularly for young people and the long term unemployed 	<p>Percentage of resident population aged 16-74 with no qualifications.</p> <p>Number of educational establishments within the LLDC area.</p> <p>Percentage of people aged 16-74 who have attained either a Level 4 or Level 5 qualification.</p> <p>Percentage of people aged 16-74 who have attained NVQ Levels 1-4.</p>	<p>99,000 fewer residents have no qualifications at all.</p> <p>185,000 more residents have degree-level qualifications.</p> <p>1,800 more children achieve 5 A*-C GCSEs, including Maths and English.</p>	
3. To improve physical and mental health and wellbeing for all and reduce health inequalities			
<ul style="list-style-type: none"> ▪ To reduce health inequalities ▪ To improve access to health and social care ▪ To reduce health inequalities amongst different groups in the community ▪ To promote healthy lifestyles and provide the necessary facilities to promote this, such as open space, sport facilities and active travel (walking and cycling). ▪ To maximise crosscutting opportunities to deliver health gains through better informed and health focused partnership working i.e. through better housing, better environment, higher educational attainment and skills. ▪ To help reduce obesity. ▪ Encourage the development of strong, cohesive communities 	<p>Number of wards in the bottom 10% for health deprivation and disability.</p> <p>Percentage resident population who consider themselves to be in good health.</p> <p>Life expectancy at birth for males and females</p> <p>Distribution of GPs.</p> <p>Percentage of households with one or more person with a long-term limiting illness.</p> <p>Distribution of sports facilities.</p> <p>Percentage of people participating in regular sport or exercise (defined as taking part on at least 3 days a week in moderate intensity sport and active recreation for at least 30 minutes continuously in any one session).</p> <p>Conception rate of under-18 year olds (per 1,000 15-17 year olds).</p>	<p>Improve the accessibility of health information and advice.</p> <p>Improve accessibility of health and health promoting services especially for the hard to reach and vulnerable people.</p> <p>Reduce rate of teenage conception.</p> <p>Reduce the number of wards with LSOAs in the bottom 10% most deprived for health deprivation.</p> <p>Ensure that there is at least one 20 ha natural green space site within 2km of people's homes.</p> <p>Fewer people with a chronic health condition.</p> <p>25,000 more adults will do weekly physical activity.</p>	<p>2010 Indices of Multiple Deprivation</p> <p>Sport England</p> <p>Office for National Statistics</p> <p>Olympic Legacy Supplementary Planning Guidance (2012)</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
4. To ensure housing provision meets local needs			
<ul style="list-style-type: none"> ▪ Ensure that there is sufficient housing to meet identified needs in all areas i.e. increase the amount of family housing ▪ Ensure that housing meets acceptable standards ▪ Increase the range and affordability of housing for all social groups within the LLDC area boundary ▪ Meet the needs of the older and vulnerable ▪ To reduce homelessness and overcrowding ▪ To reduce the number of households in temporary accommodation ▪ To ensure that appropriate social and environmental infrastructure is in place for new residents 	<p>Percentage split of dwelling types. Average house price. Ratio of relative housing affordability. Percentage of homes deemed unfit. Dwelling Stock by Tenure. Number of reposessions. Number of Homeless presentations. Number of households accepted as homeless. Number of affordable housing completions. Percentage of new dwellings meeting BREEAM/Code for Sustainable Homes Level 4 standards. Amount of social housing meeting Decent Homes Standard. Number of wards in bottom 10% of most deprived in terms of barriers to housing and services provision.</p>	<p>Contributing to the London Plan's target of building a minimum of 32,210 net additional new homes per year. Reduce the number of households living in fuel poverty. To reduce the number of LSOAs in the bottom 10% most deprived for barriers to housing and services deprivation. More affordable family homes are available – 45% of the social rented element of new developments to be for large family purposes (i.e. three bedrooms or more) either provided onsite, or where delivery proves unsustainable, provided offsite; 25% of the intermediate and market homes should have three bedrooms or more. Tower Hamlets will seek a strategic target 50% affordable housing on all housing developed in the borough, applying 35% on individual sites. Maximise Lifetime Homes Standards in new housing stock and seek at least 10% of all new homes to be wheelchair accessible. All new affordable homes to meet or exceed the Code for Sustainable Homes minimum Level 4 requirement. Required tenure mix for new affordable homes will be 60% social rented and 40% intermediate. Ensure all new homes are built to the Lifetime Standard and 10% of new homes to wheelchair standard.</p>	<p>Tower Hamlets Housing Strategy 2009-2012 Hackney Housing Strategy 2010-2015 Olympic Legacy Supplementary Planning Guidance (2012) Hackney Council Annual Monitoring Report 2010 – 2011 2010 Indices of Multiple Deprivation</p>
5. To improve sustainable access to jobs, basic goods, services and amenities for all groups			
<ul style="list-style-type: none"> ▪ Ensure that public transport services meet people's needs ▪ Ensure that highways infrastructure meets people's needs (including walking and cycling routes) 	<p>Journey to work by mode. Number of wards in bottom 10% of most deprived in terms of barriers to housing and services provision. Percentage of usually resident population</p>	<p>Increase activities and opportunities for young people to contribute to society. Reduce isolation/promote inclusion for all older people. Reduce growth in congestion. To reduce the number of LSOAs in the bottom 10% most</p>	<p>Olympic Legacy Supplementary Planning Guidance (2012) Hackney Council Annual Monitoring Report 2010 –</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<ul style="list-style-type: none"> ▪ Promote the use of sustainable travel modes (rail and buses) and reduce dependence on the private car ▪ Improve accessibility to work and services by public transport, walking and cycling ▪ Improve access to cultural and recreational facilities ▪ Improve access to open space ▪ Increase the amount of wheelchair accessible buildings ▪ Facilitate the efficiency in freight distribution ▪ Encourage a modal shift to more sustainable forms of travel as well as encouraging greater efficiency (i.e. through car-sharing) ▪ To reduce road traffic accidents 	<p>within 1km of five basic services.</p> <p>Average journey time per mile during morning peak.</p>	<p>deprived for barriers to housing and services deprivation.</p> <p>To increase walking and cycling and decrease the use of private vehicles, in line with initiatives as outlined within the submitted Legacy Communities Scheme site-wide travel plan.</p>	<p>2011</p> <p>2010 Indices of Multiple Deprivation</p>
6. To reduce poverty and social exclusion whilst promoting social inclusiveness and equality			
<ul style="list-style-type: none"> ▪ Reduce multiple deprivation and social exclusion in those most affected. ▪ Improve social cohesion. ▪ Foster a sense of pride in local neighbourhoods ▪ Set mechanisms for local people not to lose out on the benefits of the legacy ▪ Encourage engagement in community activities ▪ Tackle barriers to participation 	<p>Number of wards in bottom 10% of most deprived in terms of the Index of Multiple Deprivation.</p> <p>Number of racist offences.</p> <p>Number of homophobic offences.</p> <p>% of people who believe people from different backgrounds get on well together in their local area.</p>	<p>To reduce the number of LSOAs in the bottom 10% most deprived according to the Index of Multiple Deprivation.</p> <p>Approximately 21,000 fewer children living in poverty.</p> <p>To reduce the numbers of racist and homophobic offences.</p> <p>To increase the % of people who believe people from different backgrounds get on well together in their local area.</p>	<p>Olympic Legacy Supplementary Planning Guidance (2012)</p> <p>2010 Indices of Multiple Deprivation</p> <p>Place Surveys for London Boroughs of Hackney, Waltham Forest, Newham and Tower Hamlets.</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<ul style="list-style-type: none"> ▪ Respond to community needs and desires ▪ To ensure that the Local Plan ensures equitable outcomes for all communities, particularly those most liable to discrimination, poverty and social exclusion. 			
7. To encourage sustainable economic growth, inclusion and business development			
<ul style="list-style-type: none"> ▪ Encourage indigenous business ▪ Encourage inward investment ▪ Make land and property available for business development ▪ Encourage new and improve business development and opportunities ▪ Improve the resilience of business and the economy ▪ Promote growth in key sectors or clusters ▪ Enhance the image of the areas as a business location ▪ Improve job density ▪ Reduce skill shortages ▪ Reduce poverty and help improve earnings ▪ Provide job opportunities and improve quality of life to the most deprived sections of the community ▪ Improve business development and resilience, and enhance business competitiveness 	<p>Location of key industries and major employers.</p> <p>Visitor numbers and tourist revenue data.</p> <p>Average number of employees per VAT registered company.</p> <p>Number and value of inward investment projects.</p> <p>Number of new jobs created within the LLDC area.</p> <p>Number of new business start-ups.</p> <p>Number of wards with LSOAs in the bottom 10% most deprived for employment deprivation.</p> <p>Number of new businesses offering apprentice opportunities.</p>	<p>To reduce number of wards with LSOAs in the bottom 10% for employment deprivation.</p> <p>To have the same proportion of the population with no qualifications as the England average, and to eliminate major sub-regional variations and variations between key groups by 2026.</p> <p>The planning foundations are laid for public and private investment that will lead to the creation of over 200,000 new jobs.</p> <p>To increase the number of apprentices opportunities available for local people.</p> <p>To increase the number of businesses committed to reducing carbon emissions and building in resilience' and/or 'the number of green industries.</p>	<p>Olympic Legacy Supplementary Planning Guidance (2012)</p> <p>Office for National Statistics</p> <p>2010 Indices of Multiple Deprivation</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<ul style="list-style-type: none"> ▪ Help to diversify the economy ▪ To prevent the loss of local businesses ▪ To encourage business start-ups and support the growth of businesses ▪ Reduce levels of deprivation ▪ Support the development of green industries, resilience to climate change and a low carbon economy ▪ Help maintain London as an internationally competitive city 			
8. To increase employment opportunities for all residents in the local area			
<ul style="list-style-type: none"> ▪ Improve the range of employment opportunities ▪ Provide employment opportunities for the local community and stimulate regeneration ▪ Help to improve earnings ▪ Help improve learning and the attainment of skills ▪ Reduce unemployment, including long-term unemployment ▪ Provide jobs at higher skill levels ▪ Promote adjacency of employment, recreation and residential areas in urban areas 	<p>Economic activity rate. Employment by sector. Employment by occupation. Number of wards with LSOAs in the bottom 10% most deprived for employment deprivation. Percentage of floor space developed in defined town, borough and local centres Number and location of Conservation Areas. Percentage of working age population claiming Jobseekers' Allowance in 2010.</p>	<p>To reduce number of wards with LSOAs in the bottom 10% for employment deprivation. Remove the barriers which prevent people accessing employment. To increase the economic activity rate.</p>	<p>2010 Indices of Multiple Deprivation Olympic Legacy Supplementary Planning Guidance (2012) Office for National Statistics</p>
9. To protect and enhance biodiversity			
<ul style="list-style-type: none"> ▪ Protect and enhance sites of nature conservation importance 	<p>Key Biodiversity Plan species and habitats present in the Borough.</p>	<p>Standards for accessible natural greenspace (ANGSt). Increase the amount of open space / habitat creation</p>	<p>Natural England (2010): Nature Nearby,</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<ul style="list-style-type: none"> ▪ Protect and enhance wildlife especially rare and endangered species ▪ Protect and enhance habitats and wildlife corridors ▪ Provide opportunities for people to access wildlife and open green spaces ▪ Protect and enhance the area's water bodies to achieve a good ecological status (e.g. River Lee, Lee Navigation) ▪ Promote, educate and raise awareness of the enjoyment and benefits of the natural environment ▪ Encourage the protection of trees 	<p>Number and distribution of non-statutory designated sites.</p> <p>Amount of open space lost to development (ha).</p> <p>Area and connectivity of wildlife corridors.</p> <p>Areas considered to be deficient with access to nature within the LLDC area.</p> <p>Percentage of the LLDC area meeting ANGSt standard.</p> <p>Area and condition of local BAP habitats / species within the LLDC area.</p> <p>Area and number of Local Wildlife Sites in favourable condition within the LLDC area.</p> <p>Number of planning applications which deliver green roofs, green walls, SuDS and rainwater gardens.</p> <p>The current WFD status of the River Lee and Lee Navigation e.g. 'low', 'moderate', 'good'</p>	<p>within the LLDC area.</p> <p>To increase the number of wildlife corridors within the LLDC area.</p> <p>To improve access to nature within the LLDC area.</p> <p>The achievement of local BAP targets within the LLDC area.</p> <p>To improve the area and condition of BAP habitats / species in the LLDC area.</p> <p>To improve the area / number of Local Wildlife Sites within the LLDC area in favourable condition.</p> <p><i>Target to be established regarding green roofs, green walls, SuDS and rainwater gardens.</i></p> <p>Waterbodies within the LLDC area reach good ecological status by 2027.</p> <p>There is no deterioration in a current water body status as a result of development or policy approach.</p>	<p>Accessible Greenspace Guidance</p> <p>Natural England - Nature on the Map</p> <p>London Borough of Newham's Biodiversity Action Plan</p> <p>Annex B of the Thames RBMP</p>
10. To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)			
<ul style="list-style-type: none"> ▪ To protect and enhance townscape character and quality ▪ To promote sensitive design in development ▪ To promote local distinctiveness ▪ To minimise noise pollution (including ambient noise pollution) ▪ To minimise light pollution ▪ To protect and enhance neighbouring park open space areas ▪ Create a variety of functional open 	<p>Townscape characterisation.</p> <p>Percentage of eligible open spaces managed to Green Flag standards.</p> <p><i>Also see SA Objective 11</i></p>	<p>Ensure the townscape character is maintained or enhanced.</p> <p>An additional £155 million pounds is invested in the local public realm.</p>	<p>Olympic Legacy Supplementary Planning Guidance (2012)</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<p>space to meet community and environmental needs</p> <ul style="list-style-type: none"> ▪ Improve opportunities for recreation and play ▪ Promote a clean well – maintained public realm ▪ Promote a high quality of sustainable urban design 			
11. To protect and enhance the cultural heritage resource			
<ul style="list-style-type: none"> ▪ To protect and enhance historic buildings, sites and assets along with their setting ▪ To protect and enhance historic townscape value including Conservation Areas 	<p>Number and distribution of Listed Buildings, Scheduled Ancient Monuments (SAMs), Conservation Areas and Registered Parks and Gardens.</p> <p>Number of Listed Buildings and Conservation Areas on English Heritage's Risk Register.</p> <p>Townscape characterisation.</p> <p>Historic Landscape Characterisation.</p> <p>Number of locally Listed Buildings within the LLDC area.</p>	<p>To reduce the number of heritage assets listed on English Heritage's at risk register within the LLDC area.</p> <p>To protect important heritage assets within the LLDC area that are not statutory designated assets.</p> <p>For all relevant Conservation Areas to have an up to date Conservation Area Appraisal / Conservation Area Management Plan, which can be used to inform the Local Plan.</p>	<p>English Heritage's Annual At Risk Register</p>
12. To protect and enhance the quality of water features and resources and reduce the risk of flooding			
<ul style="list-style-type: none"> ▪ To protect and enhance ground and surface water quality ▪ Requiring sustainable use of water resources ▪ Requiring the inclusion of flood mitigation measures such as SuDs ▪ Reduce and manage flooding ▪ Reduce harmful discharges to surface and groundwater (e.g. polluted runoff) 	<p>River catchment areas.</p> <p>Occurrence of flooding events.</p> <p>Distribution of areas at risk of fluvial / tidal flooding.</p> <p>The distribution of areas at risk from surface water flooding.</p> <p>Daily domestic water use (per capita consumption, litres).</p> <p>Number of planning applications granted</p>	<p>Prevent deterioration of the status of all surface water and groundwater bodies.</p> <p>Protect, enhance and restore all bodies of surface water and groundwater with the aim of achieving 'Good' Ecological / Chemical status by 2027.</p> <p>The current WFD classification of waterbodies within the LLDC area.</p> <p>No planning applications permitted contrary to EA advice on flooding.</p>	<p>Hackney, Tower Hamlets, Newham and Waltham Forest 2010 / 2011 Annual Monitoring Reports</p> <p>Hackney, Tower Hamlets, Newham and Waltham Forest Strategic Flood Risk Assessments and Surface Water Management Plans.</p> <p>The Environment Agency</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
<p>from car parks, roads etc)</p> <ul style="list-style-type: none"> ▪ Improve water systems infrastructure ▪ Improve the quality of water bodies ▪ To improve the quality of nearby water and indirectly affected waters ▪ To maintain (through replacement or repair) flood defences to ensure an appropriate level of flood protection is achieved for existing and new developments 	<p>permission contrary to EA advice.</p>	<p>Reduction in fluvial, tidal and surface water flood extents.</p> <p>All developments safe from the impacts of flooding and not increase the risk of flooding elsewhere.</p> <p>All development include SuDS reducing runoff rates.</p> <p>To ensure flood defences provide an adequate level of protection for the lifetime of developments taking into account climate change.</p>	<p>Annex B of the Thames River Basement Management Plan</p>
13. To limit and adapt to climate change			
<ul style="list-style-type: none"> ▪ To reduce greenhouse gas emissions ▪ To require the inclusion of SuDs in new development ▪ To reduce the demand for energy and increase energy efficiency ▪ To increase the use of renewable energy ▪ To reduce CO₂ emissions from the transport sector ▪ Contribute towards helping London meet its emission targets ▪ To promote flood risk resilience measures such as green infrastructure, water efficiency and sustainable construction techniques to reduce impacts of rising temperatures 	<p>Total CO₂ emissions.</p> <p>Annual average domestic gas and electricity consumption per consumer.</p> <p>Annual gas and electricity consumption in the commercial/industrial sector.</p> <p>Number of applications for renewable energy developments.</p> <p>Per capita reduction in CO₂ emissions in the within the LLDC area.</p>	<p>No planning applications permitted contrary to EA advice on flooding.</p> <p>Requiring all major developments to achieve a target of at least 15% of their energy requirements to be provided through decentralised renewable or low carbon energy sources where feasible and viable.</p> <p>The Climate Change Act 2008 calls for at least 26% reductions from 1990 levels to be achieved by 2020.</p>	<p>Hackney, Tower Hamlets, Newham and Waltham Forest 2010 / 2011 Annual Monitoring Reports</p> <p>Climate Change Act 2008</p>
14. To protect and improve air quality			
<ul style="list-style-type: none"> ▪ To protect and improve local air 	<p>Number and distribution of AQMAs.</p>	<p>No new AQMAs to be designated.</p>	<p>Hackney, Tower Hamlets, Newham and Waltham</p>

SA Objective and Sub-Objectives	Indicators	Targets	Source
quality	Local air quality monitoring results for NO ₂ and PM ₁₀ .	Reduce levels of pollution from transport. Achievement of UK Air Quality Strategy objectives for specific pollutants.	Forest Air Quality Action Plans UK Air quality Strategy
15. To ensure sustainable use of natural resources			
<ul style="list-style-type: none"> ▪ Reduce the demand for raw materials ▪ Promote the use of recycled and secondary materials in construction ▪ Reduce the amount of derelict and vacant land ▪ Ensure that contaminated land will be guarded against ▪ Encourage development of brownfield land where appropriate ▪ Maintain and enhance soil quality ▪ Increase the proportion of waste recycling and re-use ▪ Reduce the production of waste ▪ Reduce the proportion of waste landfilled 	<p>Percentage of housing completions on previously developed land.</p> <p>Percentage of employment development on previously developed land.</p> <p>Key sources of contaminated land.</p> <p>Area of previously developed vacant land, vacant buildings and derelict land and buildings.</p> <p>Area of land currently in use but with planning allocation/permission for redevelopment and with other known redevelopment potential.</p>	<p>To increase the amount of construction aggregates to be recycled or secondary materials.</p> <p>The national annual target is that at least 60% of new housing should be provided on previously developed land.</p>	<p>PPG3: Housing (2010) (now obsolete)</p>

6.3 The Appraisal Process

6.3.1 Geographical Scope of the SA

The geographical scope of the SA will be driven by the geographical scope of the Local Plan. The SA will therefore assess the LLDC area and will consider the spatial extent of its likely impacts. In some cases this may be only local to the area in question whereas in other cases the impacts may be felt over a wider area including within the four adjacent London boroughs and potentially beyond. Similarly, the cumulative effects of development within the LLDC area may result in impacts occurring over a wider area (i.e. in-combination with other development within the four adjacent boroughs). This will also be considered in the SA.

6.3.2 Assessment of Alternatives

It is a requirement of the SEA Directive that alternatives are assessed and, therefore a series of Local Plan options will be assessed using the SA Framework. The purpose of the assessment will be to determine the sustainability strengths and weaknesses of each option such that this information can be used by the plan-makers to inform their decision to select the preferred spatial option for the Local Plan. It is proposed that a matrix based approach will be used for this assessment that enables the options to be easily compared.

6.3.3 Assessment of the Local Plan

Once the draft Local Plan has been developed, each of its components will be assessed to determine sustainability performance and to provide recommendations for sustainability improvements. At this stage in the Local Plan's development it is anticipated that the following elements of the Local Plan will need to be assessed:

- The Vision;
- The Strategic Objectives;
- The strategic direction of future growth in the area including strategic sites; and
- A set of Issue-based Policies.

The intention will be to ensure that the process is iterative with regular feedback occurring between the plan-makers and the SA team.

The method adopted to assess each element of the Local Plan will be slightly different, for example, an objective compatibility exercise to determine if there are any key conflicts between the Strategic Objectives of the Local Plan and the SA Objectives will be carried out. This will enable any recommendations to be made to adapt the objectives or will highlight any areas which will require special attention, perhaps through mitigation, during the appraisal of the Local Plan.

It is expected that a more detailed assessment of the Strategic Direction / Strategic Sites and Issue –based Policies will be undertaken using a more detailed compatibility matrix. The matrix will assesses each appropriate element against the SA Objectives and will determine the following:

- Impact – whether the impact will be positive, negative or neutral when assessed against the SA Objectives.
- Temporal scale – whether the impact will be short-term (within 5 years), occur in the medium term (5 – 10 years) or occur in the long-term (10 years +).

- Spatial scale – whether the impact will be realised at a local or wider scale. Any transboundary effects outside of the study area would also be considered.
- Permanent – whether effects will be permanent or temporary.
- Level of uncertainty – the level of uncertainty in the prediction will be classified as low, medium or high.
- Cumulative and synergistic effects.

In addition to assessing the LLDC area individually, cumulative effects will also be assessed. This will consider how the Local Plan may result in cumulative impacts in-combination with other developments across the area / adjacent boroughs. This may include the receptor topic of biodiversity for example at a borough level, or specific ecological features or designations within the LLDC area.

Where negative impacts are identified, measures will be proposed to offset, avoid or otherwise mitigate for the impact. In addition, measures which may further enhance benefits will also be identified as appropriate.

7 Next Steps in the SA Process

Following the end of the consultation period and the subsequent update of this Scoping Report (i.e. Refinement of the scope), Stage B of the SA process comprising the appraisal of the Local Plan will commence following. It is expected that the next consultation on the SA Report will be undertaken alongside the consultation on the Draft Local Plan.

Appendix A

**Review of Plans, Programmes and Environmental
Protection Objectives**

Appendix B



Baseline Data

Appendix C

Scoping Comments

Consultee	Comment	Response
Natural England	<p>Natural England recommends the inclusion/amendment of the following plans:</p> <p>The Natural Environment and Rural Communities Act (2006) http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habandspeciesimportance.aspx</p> <p>Section 41 of the NERC Act 2006, lists species and habitats of principal importance that local authorities must have regard for. Many of which are identified in the London and Olympic Park BAPs, and are relevant for the plan.</p> <p>Natural Environment White Paper (2011): http://www.defra.gov.uk/environment/natural/whitepaper/</p> <p>The NEWT has a close focus on promoting high quality natural environments, expanding multi-functional green infrastructure networks and initiating landscape-scale action to support ecological networks. The White Paper specifically seeks to: protect core areas of high nature conservation value; promote corridors and „stepping stones“ to enable species to move between key areas.</p> <p>Biodiversity Strategy for England (2011): http://www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/</p> <p>This seeks to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people. Strategy also proposes introduce a new designation for Local Green Areas to enable communities to protect places that are important to them.</p> <p>Making Space Nature (2010): http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf</p> <p>A report into the state of England’s wildlife sites, led by Professor John Lawton and published in September 2010, which showed that England’s wildlife sites are fragmented and vulnerable to change. The report makes the following key points for establishing a strong and connected natural environment: that we better protect and manage our designated wildlife sites; that we establish new Ecological Restoration Zones; and that we better protect our non-designated wildlife sites.</p> <p>Olympic Park Biodiversity Action Plan/ Revised Queen Elizabeth Olympic Park BAP</p>	<p>Noted - These plans have been incorporated into the SA Scoping Report Appendix A (where relevant) and will feed into the SA.</p>

Consultee	Comment	Response
	<p>(in progress). http://www.london2012.com/mm/Document/Publications/Sustainability/01/24/08/11/olympic-park-biodiversity-action-plan.pdf</p> <p>The UK Biodiversity Action Plan (UK BAP) was published back in 1994, and was the UK Government's response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. Action plans for the most threatened species and habitats were set out to aid recovery, and national reports, produced every three- to five-years, showed how the UK BAP was contributing to the UK's progress towards the significant reduction of biodiversity loss called for by the CBD.</p> <p>The Olympic Park Biodiversity Action Plan (now being revised as the QEOP BAP) was a planning requirement and established the biodiversity targets for the Olympic Park. This included the requirement to create 45 hectares of new habitat (which will eventually mature to meet a quality standard of SBI Grade 1 or better) to replace the loss of previously designated sites of natural conservation importance on the Park, as well as action plans for 28 species or species groups, including plants, invertebrates, fish, amphibians, reptiles, birds and mammals.</p> <p>London's Natural Signature and Lea River Valley Natural Landscape Area: http://www.naturalengland.org.uk/Images/01-execsummary_tcm6-14408.pdf and http://www.naturalengland.org.uk/Images/11-lea_tcm6-14418.pdf</p> <p>Since a lack of widespread awareness of the underlying nature of London has been a major cause of the gradual erosion of London's natural character – through for example the culverting and canalising of rivers and the felling of native woodlands – as well as of the neglect of those remnants of natural landscapes which appear to have no obvious amenity value, there is a clear demand for a succinct and evocative way of distilling and expressing this essence. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas.</p> <p>London Plan - All London Green Grid Supplementary Planning Document and Area Framework for Lee Valley and Finchley Ridge: http://www.london.gov.uk/publication/all-london-green-grid-spg http://www.london.gov.uk/sites/default/files/AF01%20Lee%20Valley%20and%20Finchley%20Ridge.pdf</p> <p>The concept of a "green grid" – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan's approach to the provision, enhancement and management of green infrastructure.</p>	

Consultee	Comment	Response
	<p>This network of spaces functions best when designed and managed as an interdependent “grid”. The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.</p> <p>Olympic Park Green Infrastructure Strategy/Revised Queen Elizabeth Olympic Park Green Infrastructure Strategy</p> <p>This strategy provides justification for the provision of all green spaces in the area of the Planning Application including open space, biodiversity areas and playspace.</p> <p>A Strategic Plan for the Waterways (in progress)</p> <p>Currently being developed by the London Legacy Development Corporation and Canal & River Trust, which will cover the rivers and canal networks within the London Legacy area. The Strategic Plan looks at 9 separate character areas and identifies potential use by types of activity and audience. Each of the Character Areas has been approached with the following aims: context of the Lower Lea Valley; create a strong sense of place and focus for the waterways; fully explore the added value of the waterspace; flood storage/attenuation and wildlife value; broad boating use; sports and recreation; integrate the use and appearance of the different areas of waterspace.</p>	
	<p>Additional baseline data to be incorporated should include:</p> <p>1 The Local Wildlife Sites within the London Legacy area should be specifically mentioned:</p> <ul style="list-style-type: none"> ▪ Bow Back Rivers ▪ Eastway Cycle Track and Bully Point Nature Reserve ▪ Lea Valley ▪ London’s Canals ▪ River Thames and Tidal Tributaries ▪ The Greenway and Old Ford Nature Reserve <p>2 There is baseline biodiversity data available for the Olympic Park site. This data should be analysed and detailed as part of the baseline evidence for Biodiversity, Flora and Fauna. Greenspace Information for Greater London (GIGL) will also have relevant</p>	<p>Noted - This information has been incorporated into the baseline appendix (Appendix B) and will be considered within the SA Report (where relevant), it will also help to inform the SA.</p> <p>Species specific data from the Olympic Park Site the GIGL has not been incorporated into the baseline appendix due to the strategic nature of the plan. This would be considered at a planning stage.</p>

Consultee	Comment	Response
	<p>baseline data for the London Legacy area.</p> <p>3 “West Ham and East Ham” in Newham (within LL boundary) are identified as deficient in access to nature under the GLA’s Area of Deficiency dataset.</p>	
	<p>In order to comply with the planning requirement to deliver the Olympic Park BAP targets, the SA should clearly identify the adopted BAP and GI objectives that need to be delivered. We understand that the QEOP BAP and GI Strategy are currently under review, and as part of this review it is important that the wider boundary of the London Legacy area is not forgotten. The QEOP BAP and GI Strategy has the potential to not only deliver targets within the QEOP area, but also guide biodiversity delivery, especially the Built Environment part of the BAP, for the rest of the LLDC area.</p>	<p>Noted - The objectives identified within the Queen Elizabeth Olympic Park Biodiversity Action Plan and Green Infrastructure Strategy will be stated within the baseline Appendix B and will be taken into account within the SA.</p>
	<p>Natural England is concerned that the protection and enhancement of biodiversity and green infrastructure is not limited to the Queen Elizabeth Olympic Park, but covers the whole of the London Legacy area, through the delivery of biodiverse habitats and green infrastructure (including in the built environment). The GI Strategy, currently under revision should become the blueprint for the direction of travel for the LL area, and link up with GI / biodiversity assets in the neighbouring authorities.</p>	<p>Noted - The protection and enhancement of biodiversity within the LLDC area will not be limited to the Queen Elizabeth Olympic Park. The SA will ensure biodiversity protection / enhancement is considered throughout the plan area and within all relevant policies.</p>
	<p>a Natural England now promotes the use of ANGSt standards rather than Box and Harrison Nature Conservation Area standard. Natural England’s “standards for accessible natural greenspace” (ANGSt) provides a basis to ensure new and existing housing has appropriate access to nature. More information can be found on Natural England’s publication, “<i>Nature Nearby, Accessible Greenspace Guidance</i>” (March 2010), available on our website, publication reference NE265.</p> <p>b Biodiversity Action Plan Priority Habitats and Species indicators and targets should reflect the targets set out in the relevant BAPs, Natural England recommends the use of the following targets and indicators 1) the achievement of BAP targets and 2) the area and condition of BAP Habitats/Species.</p> <p>c An indicator and target should be set to ensure the favourable condition and management of Local Wildlife Sites, a useful indicator and target is: the area and number of LWS in favourable condition</p> <p>d Green infrastructure in the built environment clearly supports the objectives under the Olympic Park BAP (now being revised), and the London Legacy sustainability agenda. Natural England recommends using targets and indicators such as number of planning applications which deliver green roofs, green walls, Sustainable Urban Drainage</p>	<p>Noted - All the changes suggested to the proposed assessment objectives and indicators have been incorporated into the SA Framework.</p>

Consultee	Comment	Response
	Systems and rainwater gardens.	
Environment Agency	<p>Although the Water Framework Directive (2008/98/EC) is listed in Appendix A under International Plans, the Thames River Basin Management Plan (TRBMP) which is the regional strategy for implementing the WFD is missing from the Regional and Sub-regional plans section. This should be included because the LLDC area is part of the spatial plan for the Thames Catchment area. The LLDC waterbodies are classified in the Thames RBMP in terms of their current water quality status as a result of initial investigations. The Thames RBMP outlines proposed actions (measures) needed for water bodies to achieve good status and prevent deterioration. Actions may be carried out by a range of 'co-deliverers' including local planning authorities and developers.</p> <p>2015 represents the start of the second phase of the River Basin Management Plan. 2027 is the final deadline for reaching good status under WFD.</p> <p>The recently published Thames Estuary 2100 Plan (TE2100) should be identified as a relevant plan under the Regional and Sub-regional plans section of Appendix A. The River Lee and Lee Navigation in the LLDC area are tidally influenced and the TE2100 plan puts forward actions to ensure the flood defences are fit for purpose both now and in the future. The LLDC area falls within two policy units: Isle of Dogs and Lea Valley (P5) and Royal Docks (P4) of Action Zone 3 (see pages 115-132). The vision for the Isle of Dogs and Lea Valley area is to have a flood defence system that can provide an increasing level of protection against climate change with defences integrated with new developments wherever possible. The vision for the Royal Docks is to modify the layout of defences and integrate them into new developments where possible also improving their appearance with environmental enhancements and amenity space. It is essential the TE2100 plan recommendations and actions are integrated within this Sustainability Appraisal to help ensure the Local Plan is TE2100 compliant.</p> <p>The National Plans section should include the Environment Agency's Groundwater Protection: Principles and Practice (GP3, dated November 2012) because the LLDC area is affected by a legacy of previous industrial development and potential contamination. This document outlines our position on how developments should protect our groundwater through appropriate location, mitigation and the appropriate steps to investigate and remediate land contamination.</p> <p>The Thames Catchment Flood Management Plan should also be listed as a regional plan. Alongside the TE2100 this sets the overall approach to flood risk management for the</p>	<p>Noted - The Thames River Basin Management Plan, Thames Estuary 2100 Plan and the Thames Catchment Flood Management Plan have all been added to the Regional and Sub-regional Plans section in Appendix A. In addition, the Environment Agency's Groundwater Protection: Principles and Practice (GP3, dated November 2012) has also been added to the National Plans section of Appendix A.</p> <p>Waltham Forest's Level 2 SFRA has been added to the Local Plans section of Appendix A.</p> <p>Waltham Forest's Surface Water Management Plan (2011) and Tower Hamlet's Surface Water Management Plan (2011) has also been added to the relevant Local Plan sections. We will include the Newham SWMP when it becomes available</p>

Consultee	Comment	Response
	<p>whole River Thames catchment, including the River Lee and Thames Estuary.</p> <p>Waltham Forest carried out and published both Level 1 and Level 2 Strategic Flood Risk Assessments which need to be identified and listed under the Local Plans section of Appendix A. The Level 2 SFRA represents the most up-to-date spatial assessment of flood risk in Waltham Forest. We also noticed that the boroughs Surface Water Management Plans (SWMPs) were not included on the Local list. The SWMPs in most cases contain the most up-to-date spatial data and recommendations on 'local' flood risk e.g. surface water, groundwater, sewer flood risk.</p>	
	<p>B.5 Water</p> <p>The boroughs Surface Water Management Plans were not included as relevant baseline data showing spatially how the areas are affected by surface water flood risk (critical drainage areas and local flood risk zones). This needs to be included because the boroughs SFRAs are unlikely to have been updated to include this information. For Waltham Forest the Preliminary Flood Risk Assessment has been used and we would have thought the Level 2 SFRA would be a more appropriate source of baseline data for this borough.</p>	<p>Noted - Data from relevant Surface Water Management Plans and Waltham Forests Level 2 SFRA has been added to the baseline data in Appendix B.</p>
	<p>B.12 Minerals and Waste</p> <p>The baseline data shows selected data for household waste production and recycling in each borough. Baseline data for Commercial and Industrial waste production is important because a large element has to be treated the same as household waste and will be counted towards targets for recycling and the Waste Hierarchy. It is likely that this area will generate a significant quantity of commercial and industrial waste. Commercial and Industrial waste production data is available from the 2010 Defra survey (Defra website) and Construction Demolition and Excavation Waste could be extrapolated from the Environment Agency's survey of Welsh plant (Building the Future 2005-06).</p>	<p>Noted - Commercial and industrial waste production data for the four London boroughs has been added to the baseline (http://www.defra.gov.uk/statistics/environment/waste/wrfq03-indcom/).</p> <p>It is not deemed necessary to extrapolated Construction Demolition and Excavation Waste from the Environment Agency's survey of Welsh plant (Building the Future 2005-06) as it would not significantly contribute to the baseline and the data is considered to be out of date.</p>
	<p>There should also be data for hazardous waste arising or construction and demolition waste. Data on hazardous waste is available from our website (Hazardous Waste Interrogator). Please note there is also the Datashare service available from our website – this also has datasets for Natural England, Forestry Commission, English Heritage and Canals and Rivers Trust.</p>	<p>Noted - Data from the Hazardous Waste Interrogator 2011 has been added to the relevant baseline sections</p>
	<p>5.3.5 Water</p> <p>The first bullet recognises the River Lee, Lee Navigation along with smaller watercourses</p>	<p>Noted - Information from the Thames River Basin Management Plan</p>

Consultee	Comment	Response
	<p>and ponds which may impose constraints on new developments. Although we welcome this inclusion we think this issue should be revised to reflect the Thames RBMP. This bullet should state what the current water quality status of these rivers are in the Thames RBMP (e.g. 70% of our rivers have poor ecological status), summarise the main reasons for failure and suggest that future development can contribute to ensuring these rivers achieve good ecological potential through sustainable development measures, restoration and enhancement. A positive relationship can exist between developments and waterways. Watercourses can be an important asset / key feature in developments and we think this potential positive relationship should be highlighted, rather than seen as a 'constraint.'</p> <p>We are pleased that you have identified fluvial and tidal flood risk as a key issue for the LLDC area. However, this bullet should also recognise surface water and groundwater flood risk using the boroughs Surface Water Management Plans as the baseline for this characterisation.</p> <p>The area also has a network of flood defences in order to manage the risk of fluvial and tidal flooding and some of these are in poor condition. As with all significant infrastructure, these require maintenance, repair and replacement over their lifetime and associated with that there is a residual risk of overtopping and failure of the defences. Flood defence infrastructure and the need to ensure these are maintained, repaired and replaced should be identified as a key issue for the LLDC area. This also reflects the actions and recommendations in the TE2100 plan.</p> <p>The fourth bullet needs to recognise that the LLDC area falls within a 'water stressed' area identified in our 2008 document 'Water resources in England and Wales – current state and future pressures' to help characterise the existing water resource situation. This means that in London and the South East there is high population with high water demands and limited water availability – it does not reflect water companies' ability to supply water. Grey water recycling is from washing water e.g. showers and washing machines, not from rainwater. Water efficient fixtures and fittings should also be noted as examples of how developments can reduce water use.</p> <p>The fifth bullet states that new development should be encouraged to use Sustainable</p>	<p>has been used to supplement the water baseline in Appendix B and update current issues and opportunities in the LLDC are within the SA Scoping Report.</p> <p>Noted – Information from available borough level Surface Water Management Plans has been used to supplement the flood risk baseline in Appendix B and update the issues and opportunities in the SA Scoping Report.</p> <p>Noted - Opportunities to maintain, repair and replace flood defences has been added to the current issues and opportunities in the LLDC SA Scoping Report.</p> <p>Comment noted – This has been amended and updated in the SA Scoping Report under issues and opportunities within the LLDC area.</p>

Consultee	Comment	Response
	<p>Drainage Systems to manage runoff and further reduce flood risk. We don't believe this is strong enough because this doesn't reflect the evidence in the SWMPs or the requirements of the London Plan policy 5.12 / Floods and Water Management Act 2010. New developments should be 'required' to use Sustainable Drainage Systems to reduce runoff and ensure there is no increase in flood risk.</p> <p>It is good that the last bullet identifies that groundwater quality should be protected. However this doesn't describe the character or importance of this groundwater. Our maps show that the LLDC area is underlain by a secondary aquifer which stores groundwater (e.g. the Lambeth Group – clay, silt and sand) and Source Protection Zones 1 and 2 indicate the presence abstraction points for water supply at Old Ford and Stratford Box.</p>	<p>Noted - This will be considered in the preparation of the SA.</p> <p>Noted – These issues have been reflected in the SA Report under current issues.</p>
	<p>5.3.6 Soil and Land Quality</p> <p>We thought the last bullet 'any contaminated land encountered' was too passive and we'd prefer this to state that the LLDC area will be assessed for contamination and where it is found the soil and groundwater will be remediated.</p>	<p>Noted – this will be considered in the preparation of the SA.</p>
	<p>5.3.7 Air Quality</p> <p>The air quality section should mention encouraging sustainable construction particularly through site waste management plans to reduce particulate pollution and source materials locally.</p>	<p>Noted – this will be considered in the preparation of the SA.</p>
	<p>5.3.8 Energy and Climate Change</p> <p>This section misses out adaptation to climate change which is just as important as mitigation measures e.g. through reducing carbon footprint and energy use through renewables. There should be an additional bullet summarising the importance of adaptation to climate change through flood risk resistance and resilience measures, green infrastructure and sustainable construction techniques e.g. ensuring populations keep cool during rising temperatures by locating houses at the correct orientation, using insulation, shutters, shading etc.</p>	<p>Noted – A bullet point has been added within the SA Scoping Report reflecting the importance of adaption to climate change in the issues and opportunities section of the SA Scoping Report.</p>
	<p>5.3.9 Biodiversity, Flora and Fauna</p> <p>We support this section and particularly welcome the last bullet point stating that opportunities, where possible, should be sought to develop and enhance a network of public open space, green grid infrastructure and the blue ribbon network within the LLDC area. We also welcome the statement that existing habitats such as water features should</p>	<p>Noted – No further action required.</p>

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	<p>be retained but would also add that there is an opportunity to create new habitats as well as protecting the existing ones.</p> <p>We support the statement that ‘there is a need to consider Biodiversity Action Plan commitments.’</p>	
	<p>5.3.12 Minerals and Waste</p> <p>The Waste Hierarchy starts with reduce, then reuse and then recycle. Bullet three should be revised to reflect the Waste Hierarchy by inserting ‘reduce’ before reuse.</p>	<p>Noted - The waste hierarchy comprises, prevention, preparing for re-use, recycling, other recovery and disposal. Refer to the Waste (England and Wales) Regulations 2011, the EU Waste Framework Directive (Directive 2008/98/EC) and also the Defra’s Waste Hierarchy Guidance Review 2012</p>
	<p>5.3.16 Housing</p> <p>Bullet five on ‘housing regeneration’ should also include retrofitting for climate change and water resource reduction.</p>	<p>Noted – Issues and opportunities has been amended to reflect this comment.</p>
	<p>On the whole we think the proposed objectives, targets and indicators cover the key issues well. However, we recommend some changes to table 6-1 SA Objectives, Indicators and Targets as follows:</p> <p>7. To encourage sustainable economic growth, inclusion and business development Improving the resilience of businesses and the economy to extreme events (which may be associated with climate change) e.g. fluvial, tidal or surface water flood risk, will enable businesses to bounce back quicker. Climate Local is a Local Government Association initiative which was launched in June 2012 enabling the Councils that sign up to share information about their local climate change priorities and actions to reduce carbon emissions and be resilient to a changing climate. LLDC could consider (based on a climate change risk assessment of their area) what local priorities and actions are needed to protect the economy (and other sectors) and, for example, encourage businesses to commit to some or all of these actions. We suggest the sub-objective ‘support the development of green industries and a low carbon economy’ should include ‘resilience to climate change.’ We are unsure at this stage how this could be measured however targets could be to ‘increase the number of businesses committed to reducing carbon emissions and building in resilience’ and/or ‘the number of green industries.’</p>	<p>Noted – ‘... and resilience to climate change’ has been added to the SA Sub-Objective in the SA Scoping Report along with a target stating ‘To increase the number of businesses committed to reducing carbon emissions and building in resilience’ and/or ‘the number of green industries’.</p>
	<p>9. To protect and enhance biodiversity</p> <p>The data contained in the Thames RBMP on the current classification of waterbodies will be a useful way of measuring (as an indicator) the sub-objective to ‘protect and enhance</p>	<p>Noted - Additional targets have been added to the SA Framework to reflect this comment i.e. ‘LLDC waterbodies will reach good ecological potential by 2027’ and ‘there should be no deterioration in</p>

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	<p>the area's water bodies (e.g. River Lee, Lee Navigation) to achieve good ecological potential.' The current status of the River Lee and Lee Navigation could be a useful indicator e.g. 'low', 'moderate', 'good', as these reflect in part the ecological health of these watercourses. The targets should include 'waterbodies within the LLDC area reaching good ecological status or potential.' The source of this data is Annex B of the Thames RBMP. The watercourses within the LLDC are assigned a unique reference number and are currently classified as follows:</p> <ul style="list-style-type: none"> ▪ River Lee, from Tottenham Locks to the Tideway (GB106038077852) - current status is moderate. ▪ River Lee Navigation, tidal section (GB70610068) - current status is moderate. ▪ Regents Canal, lower section (GB70610510) - current status is moderate. <p>All these watercourses are classed as heavily modified and the target is to reach good ecological potential by 2027. We are currently progressing with the second phase of the River Basin Management Plans by looking in detail at what locally specific actions are technically and financially feasible. The target related to this objective should be that the LLDC waterbodies will reach good ecological potential by 2027. Furthermore there should be no deterioration in a current water body status as a result of development or policy approach.</p>	<p>a current water body status as a result of development or policy approach'.</p>
	<p>12. To protect and enhance the quality of water features and resources and reduce the risk of flooding</p> <p>We support the sub-objective 'Reduce and manage flooding.' The indicators only refer to fluvial flooding and we think there should also be indicators on tidal and surface water flood risk e.g. the distribution of areas at risk from surface water flooding. The data source would be (at present) the boroughs Strategic Flood Risk Assessments and Surface Water Management Plans until LLDC collate this data for their Local Plan. Targets could include 'reduction in fluvial, tidal and surface water flood extents;' 'all developments safe from the impacts of flooding and not increase the risk of flooding elsewhere' and 'all development include sustainable drainage systems reducing runoff rates.'</p> <p>In line with our earlier comment, there should also be a sub-objective on maintaining (through replacement or repair) flood defences to ensure an appropriate level of flood protection is achieved for existing and new developments. Some of the existing flood defences are in poor condition or will require upgrading in the future to fit with climate change predictions (see TE2100 plan). The target would be for flood defences providing an</p>	<p>Noted - Indicators on tidal and surface water flood risk have been added to the SA Framework along with additional relevant targets.</p> <p>Noted – An SA Sub-Objective on flood defence along with a relevant target has been added to the SA Framework in the SA Scoping Report.</p>

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	<p>adequate level of protection for the lifetime of developments taking into account climate change.</p> <p>We support the sub-objective to improve the quality of waterbodies with a target included to 'protect, enhance and restore all bodies of surface water and groundwater with the aim of achieving 'good' ecological/chemical status by 2015.' 2015 should be amended to 2027 as the final deadline laid out in the Water Framework Directive. As mentioned for objective 9 above the indicator could be the current classification of the waterbodies from Annex B of the Thames RBMP.</p> <p>The sub-objective on reducing discharges to surface and groundwater is good though we thought this should also mention the potential for harmful discharges (e.g. polluted runoff from car parks, roads). This ensures the water quality aspect of discharges is recognised as well as the quantity of runoff which could increase flood risk.</p> <p>The sub-objectives on 'encourage sustainable use of water resources' and 'encourage the inclusion of flood mitigation measures such as SuDs' could be stronger by 'requiring' rather than 'encouraging' and there is evidence to support this approach. The average water consumption in 2008-09 across the boroughs of Hackney, Newham, Waltham Forest and Tower Hamlets was 160 litres per person per day which was higher than the national average of 148 litres per person per day. There is more data available in the individual London Borough 'State of the Environment Report' factsheets on our website.</p> <p>Furthermore, the SFRAs/SWMPs demonstrate the area is at risk from fluvial, tidal and surface water flood risk. The Floods and Water Management Act is setting the direction for Local Authorities to be assessing and ensuring all developments adopt SuDs to reduce runoff and alleviate pressure from the sewer network.</p>	<p>Noted – 2015 has been amended to 2027. In addition, an indicator reflecting the current classification of the waterbodies from Annex B of the Thames RBMP has also been added to the SA Framework in the SA Scoping Report.</p> <p>Noted - Sub-Objective on reducing discharges to surface and groundwater has been amended in the SA Framework to include the potential for harmful discharges (e.g. polluted runoff from car parks, roads).</p> <p>Noted - Sub-Objectives 'encourage sustainable use of water resources' and 'encourage the inclusion of flood mitigation measures such as SuDs' have been amended in the SA Framework to state the word 'requiring' rather than 'encourage'.</p>
	<p>13. To limit and adapt to climate change</p> <p>The only sub-objective on adaptation is 'to require the inclusion of SuDs in new development.' We suggest objectives, indicators and targets are included which focus on adapting to the impacts of climate change, for example, flood risk resilience measures, green infrastructure, water efficiency and sustainable construction techniques to reduce the impact from rising temperatures. The Planning and Climate Change Coalition guidance (April 2012) stresses that mitigation and adaptation are two vital components of a holistic and coherent response to climate change and that adaptation is sometimes regarded as a secondary priority.</p>	<p>Noted - Sub-Objectives, indicators and targets relating to adapting to climate change i.e. flood risk resilience measures, green infrastructure, water efficiency and sustainable construction techniques have been included within the SA Framework in the SA Scoping Report.</p>
	<p>We find it easier to understand matrices when there is some explanation as to why the</p>	<p>Comment noted – This is the approach that will be adopted within the</p>

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	<p>impact is considered positive, negative or neutral i.e. brief commentary. Where negative impacts are identified a more detailed explanation of how the impact will be avoided, offset or mitigated is helpful, especially in terms of how the Local Plan strategic sites or issue-based policies will be revised to ensure this happens.</p>	<p>SA.</p>
	<p>Section B.17 Transboundary Issues in Appendix B Baseline Data</p> <p>The fluvial flood risk in Hackney Wick also affects the London Borough of Hackney and a smaller area of the London Borough of Tower Hamlets. Hackney's Level 2 SFRA identified a possible flood alleviation scheme involving a sheet piled flood defence along the Lee Navigation in both boroughs, with a compensatory flood storage area upstream in Hackney Marshes. Surface water flood risk and the measures to manage this may also be a transboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. LLDC will need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations. The baseline data can be sourced from the boroughs SFRAs and SWMPs.</p>	<p>This transboundary issue has been added to the baseline and will be taken into account within the SA.</p>
<p>English Heritage</p>	<p>5.3 Key Sustainability Issues and Opportunities</p> <p>Overall the Local Plan should seek to conserve and enhance the significance of all heritage assets. This includes the development of a positive strategy to broaden understanding and access to the historic environment (e.g. achieved through dissemination of archaeological investigations), and improve the conditions of heritage assets by enabling a reduction in the number of assets 'at risk' (as identified by the English Heritage's Heritage at Risk (HAR) Register). The current wording suggests the assets at risk should be conserved and enhanced 'where possible'. This approach is considered not to be sufficiently robust as contrary to the NPPF.</p>	<p>Noted – reference to 'where possible' has been removed from the issues and opportunities within the SA Scoping Report.</p>
	<p>On considering the details provided the range of heritage assets is limited. The heritage baseline should be broadened to include designated and non-designated heritage assets. For example the Boroughs which fall within the Local Plan area have identified locally listed buildings. There is also key baseline data on the historic environment, principally non-designated, held on the Greater London Historic Environment Record (GLHER). The significance of this information and the assets it identifies should be captured in the appraisal process. In addition it is important to identify and understand the setting of all heritage assets. As expressed in the NPPF the setting of a heritage asset can contribute to its significance. This important issue needs to be captured in the appraisal of the Local Plan. This includes opportunities to enhance and better reveal the significance of heritage</p>	<p>Noted – Locally Listed Buildings data and information from the Greater London Historic Environment Record has been used to supplement the baseline data in Appendix B and will inform the SA.</p>

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	<p>assets, which can often be achieved through responsive developments within the setting of heritage assets. It should be noted that the Newham's Archaeological Priority Areas (APA) are being reviewed, with an expectation of it being completed in March 2013. In the meantime we would advise that APAs do exist in other Boroughs and which do cover the Local Plan area. They are often titled differently. For example in Tower Hamlets the Borough defines APAs as Areas of Archaeological Importance.</p>	
	<p>6.2 Development of the Sustainability Objectives SA Objective and Sub Objectives 11 Indicators & Targets – We would advise that the number of heritage assets on the English Heritage's HAR Register should be instead of number of conservation areas and listed buildings. The target for this indicator should be to reduce the number of assets on the HAR Register, and not to ensure no additional assets are added.</p>	<p>Noted – This has been amended in the SA Framework within the SA Scoping Report.</p>
	<p>A new indicator which could be added relates to Conservation Area Appraisals and Management Plans (CAA/CAMP). The target could be for all relevant Conservation Areas to have up to date CAA/CAMPs, which are then used to inform the Local Plan.</p>	<p>Noted – This indicator has been added to the SA Framework.</p>
	<p>The terminology used needs to be aligned with the NPPF. For example the term historic assets is used in the 'targets' section. This should be heritage assets which are clearly defined in the NPPF.</p>	<p>Noted – The term 'heritage assets' will be used throughout the SA rather than the term 'historic assets'.</p>
	<p>Appendix A - Analysis of Relevant Plans, Programmes and environmental Protection Objectives There are a number of additional documents that should be included when considering the historic environment. These are listed below:</p> <ul style="list-style-type: none"> ▪ Planning (Listed Buildings and Conservation Areas) Act 1990 ▪ The PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide – March 2010 (it should be noted that this is still valid and not replaced by the introduction of the NPPF and remains until a replacement is published). ▪ English Heritage's Guidance on the Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010) (http://www.englishheritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/). This document should be carefully reviewed as part of developing the SA for the Local Plan. ▪ A Research Framework for London Archaeology (2002) (http://www.englishheritage.org.uk/professional/advice/our-planning-role/greater-london-archaeologyadvisory-service/about-glaas/research-frameworks/) 	<p>Noted - These plans have been incorporated into the SA Scoping Report Appendix A and will feed into the SA where relevant.</p>

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	<ul style="list-style-type: none"> ▪ Relevant Conservation Area Appraisal and Management Plans; and where available ▪ Borough Heritage Strategies. 	
	<p>Appendix B – Baseline Data B.10 Cultural Heritage</p> <p>Reflecting our comments above in response to the issues and opportunities, the range of heritage assets considered is limited. In addition to locally listed buildings not captured, the baseline data should also include details from the GLHER. This Record contains a wealth of information such as non-designated heritage assets. Overall it acts as an invaluable archaeological and historic resource both above and below ground. It is constantly being up dated as new investigations and discoveries are being identified, partly due to the recording and dissemination of field work. This information can be useful for both plan making and development management purposes.</p>	<p>Previously noted – Locally Listed Buildings data and information from the Greater London Historic Environment Record have been used to supplement the baseline data in Appendix B and will ultimately inform the SA.</p>
Transport for Greater London	<p>5.3.5, 5.3.12 and 5.3.13</p> <p>These sections make no reference to the potential for use of water for leisure, freight, waste or construction. Improvements have been made at Three Mills Lock to enable larger barges to enter the area’s waterways network, and were actively used for the construction of the Olympic Park.</p>	<p>Noted - The potential for the use of waterways within the LLDC area for leisure, freight, waste or construction will be included within the SA Scoping Report under current opportunities.</p>
	<p>5.3.13 Transportation:</p> <p>Bullet 1:</p> <p>Comment - “The LLDC area appears to be well connected <u>strategically</u> by transport infrastructure and public transport links, making the area relatively accessible.” The strategic infrastructure is established, or has been enhanced to support the Olympic Games, with the minor exception of routes north of Stratford towards Waltham Forest. As point 6 notes the <u>local</u> links are often poor – sometimes a result of the barriers of transport infrastructure such as roads and railways.</p>	<p>Noted – Issues and opportunities have been updated in the SA Scoping Report to reflect this comment.</p>
	<p>Bullet 2:</p> <p>Comment - “Stratford regional and international, <u>Pudding Mill Lane DLR</u>, Hackney Wick <u>London Overground</u> stations are located within the LLDC area”.</p>	<p>Noted – Issues and opportunities have been updated in the SA Scoping Report to reflect this comment.</p>
	6. SA Objectives and Sub-Objectives	Comment noted – Additional relevant targets have been added to

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	<p>5 Sustainable Access</p> <p>Targets: This could include some reference to modal shift measures, for example to increase walking and cycling, or decrease use of private vehicles, in line with such initiatives as included in the submitted LCS site-wide travel plan.</p>	<p>complement the SA Objective and Sub-Objectives.</p>
	<p>Appendix A</p> <p>P37 Mayor's Transport Strategy:</p> <p>As well as the headline goals, note that MTS section 5.11 and proposal 47 relate to the 2012 Games Legacy. Further to this, "Leaving a Transport Legacy" was produced in March 2012 – see p 71 for Monitoring.</p> <p>http://www.london.gov.uk/priorities/london-2012/better-transport-networks/creating-transport-legacy</p> <p>TfL will be continuing to undertake monitoring of the transport legacy of the 2012 London Games – which will partly relate to London-wide measures and opportunities to change travel behaviour, while there may be some local information and analysis that will be of use to LLDC, and TfL will be pleased to share this with you.</p> <p>TfL's recent Travel in London reports are linked below.</p> <p>See Section 5.9 of TIL 4 (2011) for an overview of 2012 Games monitoring.</p> <p>http://www.tfl.gov.uk/assets/downloads/corporate/travel-in-london-report-4.pdf</p> <p>TIL 5 (2012), with a spotlight on the 2012 Games.</p> <p>http://www.tfl.gov.uk/assets/downloads/corporate/travel-in-london-report-5.pdf</p>	<p>Noted – Appendix A of the SA Scoping Report has been updated to include relevant additional documents except for the "Leaving a Transport Legacy" Report which was not available in the website We will include the document in the SA Report once it is available</p>
	<p>B13</p> <p>The 2011 Census information is being released.</p>	<p>Noted – 2011 Census data has been referred to and included within the baseline appendix where relevant.</p>