



Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

SA Report

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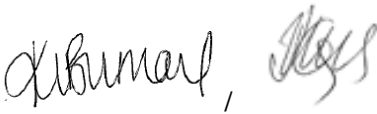
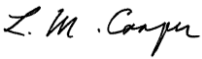
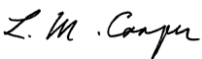


London Legacy Development Corporation

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Local Plan

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ABBREVIATIONS

AAP	Area Action Plans
AMR	Annual Monitoring Report
AONBs	Area of Outstanding Natural Beauty
APS	Annual Population Survey
AQMAs	Air Quality Management Areas
BAP	Biodiversity Action Plan
GVA	Gross Value Added
HRA	Habitats Regulations Assessment
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserves
LSOA	Lower Super Output Area
MOL	Metropolitan Open Land
NEETs	Not in education, employment, or training
NNR	National Nature Reserves
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
PAS	Planning Advisory Service
SA	Sustainability Appraisal
SAC	Special Area of Conservation
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

1 INTRODUCTION

The London Legacy Development Corporation (LLDC) is currently in the process of preparing its 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) for the London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest.

As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is being undertaken. The term SA shall be used to refer to the combined SA/SEA for the remainder of this report. This report presents the process and findings of the SA of the emerging Local Plan.

1.1 Background to and Purpose of the Local Plan

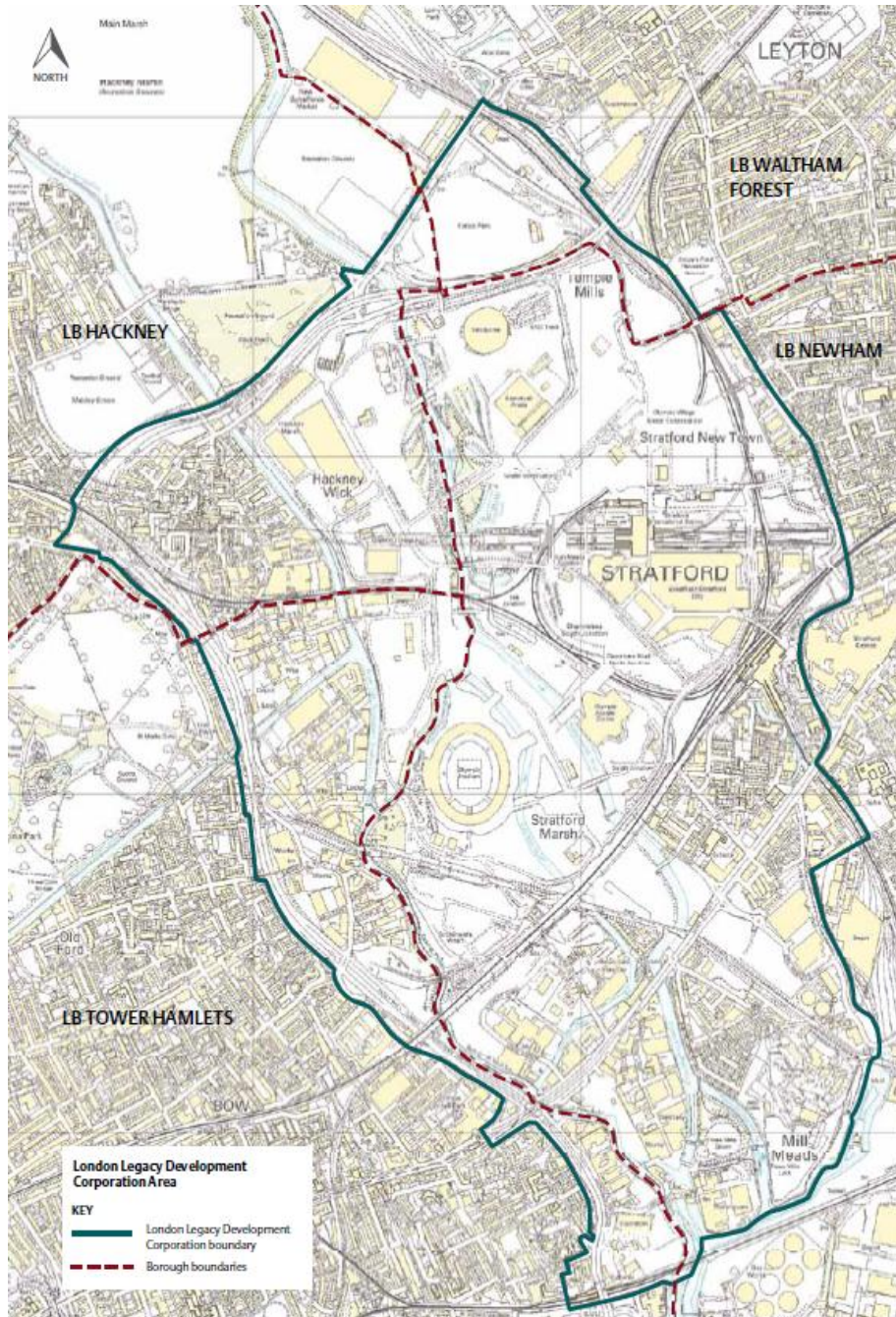
On 1 October 2012, the LLDC Planning Functions Order came into force giving the LLDC the full range of planning functions that would normally be available to a local planning authority, including plan making powers. The LLDC is the planning authority for the Mayor's development corporation in east London 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 Neighborhoods - Five new neighborhoods 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 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. Therefore, the emerging Local Plan will eventually provide the planning policy framework to deliver the vision, goals and aspirations for the LLDC area. The Local Plan together with the London Plan will guide development within the LLDC area and will be used in the determination of future planning applications. The LLDC area is presented on Figure 1-1.

Figure 1-1 Location of the LLDC Area



The Local Plan includes the following key elements:

- An outline of the key issues facing the area i.e. a 'spatial portrait'.
- A vision for how the area should look in 2031, with strategic level supporting objectives.
- The strategic direction of future growth in the area, including the identification of strategic sub areas and sites which are key to the delivery of the vision, and a suite of place-based policies which will describe how sub areas 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 housing, business, economy and employment, infrastructure, natural environment, historic and built environment, and transport requirements.

- A delivery and implementation strategy which covers planning obligations and community infrastructure levy as well as compulsory purchase powers.

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 were 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 1-1 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 – March 2013	Consultation on the SA Scoping Report
Jan – September 2013	Development of draft policies, proposals and designations that will form the Local Plan taking views and information provided into account
November 2013 – January 2014	Informal consultation on the draft Local Plan and the draft SA
Spring 2014	Formal publication and consultation period for the Local Plan
Summer 2014	Independent examination of Local Plan by a planning inspector
January 2015	Formal adoption of the Local Plan

1.2 Background to and Purpose of the SA Report

SA (incorporating the requirements of the SEA Directive¹) has been undertaken on the Local Plan throughout its development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the Local Plan and that it broadly complies with the relevant planning guidance. The overarching aim of the process is to contribute to better decision-making and planning. SA is an iterative process and follows a series of prescribed stages as set out in Section 2.2 in which the elements of the Local Plan are appraised against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development that is brought forward.

This SA Report provides a summary of the SA process so far and presents the findings and recommendations of the assessment of the Local Plan. The key aims are to:

- Provide information on the Local Plan and the SA process;
- Present the key existing social, economic and environmental conditions within the LLDC area, in the context of existing plans, programmes and environmental protection objectives, together with relevant baseline information;
- Identify, describe and evaluate the likely significant effects of the Local Plan;
- Recommend measures to avoid, reduce or offset any potentially significant adverse effects; and

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

- Propose a monitoring framework that can be used to monitor the identified significant effects.

It is essential that the Local Plan is read in conjunction with this SA Report.

1.3 Structure of this SA Report

Table 1-2 provides an outline of the contents and structure of this SA Report.

Table 1-2 Contents and Structure of this SA Report

Section of SA Report	Outline Content
Non-Technical Summary (separate document)	Summary of the SA process and SA Report in plain English (a legislative requirement).
Abbreviations	Abbreviations used in this report.
1: Introduction	Provides the background to, purpose of, and structure of the Local Plan and this SA Report. It also introduces the concept and application of the Habitats Regulations Assessment (HRA) process.
2: Sustainability Appraisal	This section outlines the legal requirements for the SA. It outlines the key elements of the SA process and the approach adopted for appraising the effects of the Local Plan (including the SA Framework), together with an overview of the consultation requirements.
3: The Local Plan Alternatives	Outlines the development of alternative options that were considered and appraised as part of the development of the Local Plan.
4: Appraisal of the Local Plan	Presents the full appraisal of the Local Plan against the SA Framework including cumulative effects.
5: Monitoring Framework	Provides an outline of the proposed monitoring framework.
6: Next Steps	Identifies the next steps in the SA process, following consultation on this SA Report. Details of how to comment upon this SA Report are also provided.
Appendix A	Presents the full analysis of relevant Plans, Programmes and Environmental Protection Objectives and their relationship/conflicts with the Local Plan.
Appendix B	Contains the baseline data, a summary of which is presented in Chapter 2.
Appendix C	Vision and Objectives Options Appraisal
Appendix D	Alternative Options Policies and Sub Areas
Appendix E	Policy Options Appraisal
Appendix F	Sustainability Appraisal Matrices Policies
Appendix G	Sustainability Appraisal Matrices Sub Areas and Site Allocations

1.4 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 Area of Conservation (cSAC), Special Protection Area (SPA), potential Special Protection Area (pSPA) and Ramsar site), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The

overarching process is referred to as HRA. A HRA screening exercise is therefore being undertaken in tandem with this SA to determine if 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 is documented in a Screening Report that will be submitted to Natural England.

2 SUSTAINABILITY APPRAISAL

2.1 Legal Requirements

It is a legal requirement that the LLDC 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 Directive which was transposed directly into UK law through the SEA Regulations².

The aim of the SEA 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'* (Article 1 of the SEA Directive).

A combined SA and SEA has been undertaken, as the Local Plan has the potential to have a range of significant sustainability effects (both positive and negative). The SA has been undertaken in accordance with guidance from the Planning Advisory Service (<http://www.pas.gov.uk/pas/core/page.do?pageId=152450>). In addition, published Government guidance on SEA³ (hereafter referred to as the Practical Guide) has also been followed.

2.2 Stages in the SA Process

Although there are formalised approaches for both SA and SEA, only the latter has a legal obligation to perform certain activities as stipulated in the SEA Directive. These legal obligations have been adhered to throughout the SA process by following a series of prescribed stages, through which the elements of the Local Plan have been appraised using Sustainability Objectives (Table 2-1 provides further detail).

Table 2-1 presents a summary of the key stages of the SA process, together with the SEA Directive requirements for each stage. Reference is given to where the requirements have been addressed within this SA Report.

Table 2-1 Stages in the SA Process and SEA Directive Requirements

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA 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	The Environment Report should provide information on: <i>"the relationship (of the plan or programme) with other relevant plans and programmes"</i> (Annex 1(a)) <i>"the environmental protection objectives, established at international (European) 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"</i> (Annex 1(e))	Chapter 2 and Appendix A.	Stage A corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report that was consulted upon in February / March 2013. During this stage the scope of the SA for the Local Plan was

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

³ ODPM *et al.* (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Local Plan
A2: Collecting baseline information	The Environment Report should provide information on: <i>“relevant aspects of the current state of the environment and the likely evolution thereof without its implementation of the plan or programme” and, “the environmental characteristics of the areas likely to be significantly affected”</i> (Annex 1(b), (c)) <i>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC”</i> (Annex 1 (c))	Chapter 2 and Appendix B	defined.
A3: Identifying sustainability issues and problems		Chapter 2	
A4: Developing the SA Framework		N/A	
A5: Consulting on the scope of the SA	<i>The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.(Article 5.4)</i>	Chapter 2 The scope of the appraisal is presented in Chapter 2. A Scoping Report was produced and consulted upon.	
Stage B: Developing and Refining Options and Assessing Effects			
B1: Testing the Local Plan’s objectives against the SA Framework	The Environment Report should consider <i>“reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with”</i> (Article 5.1 and Annex I(h))	Chapter 3 and Appendix C.	Stage B of the SEA process is linked to the overall production of the Local Plan which includes the development of the strategic plan policies and sub area policies and site allocations options and the finalisation of the preferred options. There has been a degree of interaction between the plan-making and SA teams during this stage in the process. This has enabled potential adverse effects of the Local Plan to be avoided/minimised and potential sustainability benefits maximised.
B2: Developing the Local Plan Options	In the Environmental Report, <i>“the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated”</i> (Article 5.1)		
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	Annex I (g) states that it should also include <i>“measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme...”</i>		
B6: Proposing measures to monitor the significant effects	<i>The Environmental Report should provide information on “a description of the measures envisaged concerning monitoring”</i> (Annex I (i))		

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Local Plan
of implementing the Local Plan			
Stage C: Preparing the SA Report			
C1: Preparing the SA Report	Article 5.1 contains the requirement for an environmental report to be produced where an assessment is required. The environmental report “ <i>shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication..</i> ” (Article 5.2). Details of the information to be given in the Environmental Report are provided in Annex 1.	This SA Report represents the required Stage C output.	This SA Report has been produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non-Technical Summary is also provided.
Stage D: Consultation on the Local Plan and the SA Report			
D1: Public participation on the proposed submission documents	Article 6 contains the requirements for the draft plan or programme and the environmental report to be made available to statutory authorities and the public. They should be given an ‘ <i>early and effective opportunity within time frames to express their opinions</i> ’ (Article 6.2).	Arrangements for consultation are indicated in Chapter 6.	The SA Report and the Local Plan will be consulted upon in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
D2: Appraising significant changes resulting from representations	N/A	N/A	Following the receipt of representations, the SA Report may need to be updated to reflect comments received. The SA Report will need to be updated to accompany the Publication (Regulation 30) version of the Local Plan. It will be essential for the SA Report and the Local Plan to remain consistent.
D3: Making decisions and providing information			
Stage E: Monitoring the significant effects of implementing the Local Plan			
E1: Finalising aims and methods for monitoring	“ <i>Member States shall monitor the significant environmental effects of the implementation of plans and programmes... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action</i> ” (Article 10.1)	Monitoring will commence once the Local Plan has been adopted. A draft monitoring framework is included within Chapter 5 of this SA Report.	Monitoring undertaken for the SA process should feed into the Annual Monitoring Report AMR).
E2: Responding to adverse effects			

The following sections detail the activities that have been, and are proposed to be, undertaken at each stage of the SA process. This provides context and background to the SA to date

including its agreed scope, the methodology for the appraisal of the Local Plan, and the technical limitations to the appraisal.

2.3 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope

2.3.1 Review of Plans, Policies and Environmental Protection Objectives

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.

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.

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 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.

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.

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

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.

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.

Key Results from the Review

There were many common themes emerging through the review of plans, programmes and environmental protection objectives. 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.

2.3.2 Establishing the Baseline

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)).

Characterising the environmental and sustainability baseline, issues and context helps to define the SA Framework. It involves the following key elements:

- Characterising the current state of the environment within the LLDC area and immediate surroundings (including social and economic aspects as well as the natural environment); and
- Using this information to identify existing problems and opportunities which could be considered in the Local Plan where relevant.

The baseline was characterised through the following methods:

- Review of relevant local, sub- regional, regional, national and international plans, policies and environmental protection objectives;
- Data gathering using a series of baseline indicators developed from the SEA Directive topics, the PAS guidance, and the data available for the area.
- Consideration of the scope and contents of the Local Plan.

A detailed description of the baseline characteristics of the LLDC area is provided in Appendix B, together with any identified data gaps and inadequacies. Obtaining these datasets would help to further increase the knowledge of the areas and therefore the potential impacts of the Local Plan. Such data gaps could potentially be overcome through the use of the monitoring framework.

The baseline data has been used to identify the key sustainability issues and opportunities within the LLDC area, a summary of which is presented in the paragraphs below. Although these have been grouped by broad sustainability theme, many are indirectly or directly linked and are therefore closely related.

Key Sustainability Issues and Opportunities

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.

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.

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.

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.

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 misconceptions, 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 of 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.

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.

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.

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 development along with green infrastructure and sustainable construction techniques are used e.g. ensuring populations keep cool during rising temperatures by locating houses at the correct orientation, using insulation, shutters, shading etc.

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.

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.

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.

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.

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 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.

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 lower 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.

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.

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.

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 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.

2.3.3 Scope of the Appraisal

The SA process commenced in 2012 with the preparation of an SA Scoping Report for the LLDC Local Plan as a whole (Hyder Report Reference: 002-UA005031-UE31-01). The Scoping Report contained:

- Characterisation of the environmental, social and economic baseline within the LLDC area and the surrounding four London Boroughs;
- A review of relevant plans, programmes and environmental protection objectives that could influence the SA and the development of the Local Plan;
- Identification of key sustainability issues and opportunities, together with recommendations for mitigation where required; and
- The development of the SA Framework against which the elements of the Local Plan have been assessed.

Geographical Scope of the Appraisal

The Scoping Report set out the scope and approach to the assessment of the Local Plan. The geographical scope of the SA was driven by the geographical scope of the Local Plan. The SA therefore assesses the LLDC area and considers the spatial extent of its likely impacts.

Temporal Scope of the Appraisal

The LLDC sets out the framework for facilitating the determination of future planning applications within the LLDC area until 2031.

Topics Covered in the Appraisal

The SA comprises the consideration of the environmental, social and economic effects of the Local Plan. The baseline characterisation has therefore reflected the topics set out in the SEA Directive, but also considers relevant additional social and economic topics as recommended in the PAS SA guidance. Table 2-2 identifies the topics covered, together with their relationship with the topics listed in Annex I of the SEA Directive.

Table 2-2 Topics Covered in the SA and Relevant SEA Directive Topics

Topics covered in the SA	Relevant topics listed in Annex I of the SEA Directive
Population	Population and Human Health Material Assets
Education and Qualifications	Material Assets
Health	Population and Human Health Material Assets
Crime	Population and Human Health
Water	Water and Soil
Soil and Land Quality	Water and Soil Material Assets
Air Quality	Air
Energy and Climate Change	Climatic Factors
Biodiversity, Flora and Fauna	Biodiversity, Flora and Fauna
Cultural Heritage	Cultural heritage and landscape
Landscape	Cultural heritage and landscape
Minerals and Waste	Material Assets
Transportation	Material Assets
Economy	Material Assets
Deprivation and Living Environment	Population and Human Health Material Assets
Housing	Material Assets

Annex I of the SEA Directive also requires an assessment of secondary, cumulative and synergistic effects, the results of which are provided in Chapter 4. Transboundary impacts on neighbouring authorities are considered inherently throughout the assessment.

2.3.4 The Scoping Consultation

The Scoping Report was issued for public consultation in February 2013, for a four week consultation period. The aim of this was to obtain comment and feedback upon the scope and level of detail of the SA.

It was issued to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and transport for London along with the public through the reports availability on the Legacy Corporation's website. In addition, the four boroughs were also specifically consulted upon the scope of the sustainability appraisal. The report was subsequently updated following this consultation feedback.

2.3.5 The SA Framework

The SA Framework was developed at the scoping stage. It underpins the assessment methodology and comprises a series of 15 aspirational objectives (SA Objectives) against which the Local Plan has been assessed. The SA Objectives are intended to be overarching and

aspirational. To ensure a consistent approach, the SA Objectives are common to all the SAs conducted for elements of the Local Plan. They address the full cross-section of environmental, economic and social sustainability issues within the LLDC area.

The SA Objectives have been developed using the review of other relevant plans, programmes and environmental protection objectives, the baseline data and the key issue and opportunities identified. Each of the SA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. These sub-objectives have been considered by the assessors when undertaking the appraisal in order to inform their decision.

The SA Objectives and associated sub-objectives are presented in Table 2-3.

Table 2-3 SA Objectives and Sub-Objectives

SA Objective		Sub-Objectives	Indicators and sources
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 	<ul style="list-style-type: none"> ▪ Crime rates per 1000 of the population for key offences including burglary (Office for National Statistics Local Profiles). ▪ Percentage of people who thought anti-social behaviour was a problem in their local area (Place Survey).
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 ▪ To improve the provision of education and training facilities, particularly for young people and the long term unemployed 	<ul style="list-style-type: none"> ▪ Percentage of pupils achieving five or more GCSEs at Grades A* - C or equivalent (Office for National Statistics Local Profiles). ▪ Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles). ▪ Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles). ▪ Percentage of 16-18 year olds not in education, employment or training (NEETs) (Department for Education). ▪ Education, Skills and Training Deprivation (Indices of Deprivation for England 2010). ▪ Proportion of people aged 16-64 who received job related training (Annual Population Survey (APS) NOMIS, Office for National Statistics). ▪ Lower Super Output Areas (LSOAs) in the bottom 20% for education, skills and training deprivation (Indices of Deprivation for England).
3	To improve physical and	<ul style="list-style-type: none"> ▪ To reduce health inequalities 	<ul style="list-style-type: none"> ▪ Percentage of adults who are overweight or obese

SA Objective	Sub-Objectives	Indicators and sources
<p>mental health and wellbeing for all and reduce health inequalities</p>	<ul style="list-style-type: none"> ▪ 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 	<ul style="list-style-type: none"> ▪ Percentage of the resident population who consider themselves to be in good health (surveys). ▪ Life expectancy at birth for males and females (Office for National Statistics Local Profiles). ▪ Standardised mortality rates for all cause of death, circulatory disease and all cancers (Neighbourhood Statistics, Office for National Statistics) ▪ Distribution of and GPs and dentists (Local Authorities). ▪ 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) (Sport England Active People Survey). ▪ Conception rate of 15-17 year olds (per 1,000) (Office for National Statistics). ▪ Health Deprivation and Disability (Indices of Deprivation for England). ▪ Long- standing conditions in Hackney (The Information Centre for Health and Social Care).
<p>4 To ensure housing provision meets local needs</p>	<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 	<ul style="list-style-type: none"> ▪ Average house price (Department for Communities and Local Government, from Land Registry). ▪ Ratio of relative housing affordability (Office for National Statistics Local Profiles). ▪ Number of vacant dwellings (Office for National Statistics Local Profiles). ▪ Dwelling Stock by Tenure (Office for National Statistics Local Profiles). ▪ Number of affordable housing completions (Office for National Statistics Local Profiles). ▪ Number of Homeless presentations (Neighbourhood Statistics ONS Office for National Statistics).

SA Objective	Sub-Objectives	Indicators and sources
5	<p>To improve sustainable access to jobs, basic goods, services and amenities for all groups</p> <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) ▪ 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 	<ul style="list-style-type: none"> ▪ Distribution of major transport systems – roads, rail, cycle links etc. (Ordnance Survey mapping). ▪ Journey to work by mode (2001 Census).
6	<p>To reduce poverty and social exclusion whilst promoting social inclusiveness and equality</p> <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 ▪ 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. 	<ul style="list-style-type: none"> ▪ Number and percentage of lower super output areas in the most deprived 10% lower super output areas for London ▪ Average house price compared to average annual salary ▪ Number and percentage of domestic units that are provided for affordable housing per year ▪ The number of homelessness presentations received by each Borough per 1000 households annually ▪ Percentage of population of a working age qualified to NVQ level 4+ or equivalent
7	<p>To encourage sustainable economic growth, inclusion and business development</p> <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 	<ul style="list-style-type: none"> ▪ UK Competitiveness Index ▪ Number of jobs in the Growth Boroughs ▪ Gross Value Added (GVA) per head of local population ▪ Full time gross median pay (£/week) ▪ Percentage of residents working age population in employment ▪ The percentage of unemployed people claiming benefits who have been out of work for over a year ▪ Proportion of residents on Jobseeker's Allowance

SA Objective	Sub-Objectives	Indicators and sources
	<ul style="list-style-type: none"> ▪ 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 ▪ 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 	<ul style="list-style-type: none"> ▪ Amount of land (in hectares) available for employment
8	<p>To increase employment opportunities for all residents in the local area</p> <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 	<ul style="list-style-type: none"> ▪ Economic activity rate (ONS- NOMIS). ▪ Employment by occupation (ONS- NOMIS). ▪ Employment by industry (ONS- NOMIS). ▪ Percentage of resident population claiming Jobseekers" Allowance (ONS – NOMIS). ▪ Average gross weekly pay (2011 ONS- NOMIS). ▪ Job density (ONS- NOMIS)
9	<p>To protect and enhance biodiversity</p> <ul style="list-style-type: none"> ▪ Protect and enhance sites of nature conservation importance ▪ 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 	<ul style="list-style-type: none"> ▪ Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites). ▪ Key Biodiversity Action Plan (BAP) species and habitats present (London BAP). ▪ Percentage of features of internationally and nationally designated sites in favourable condition (SACs, SPAs, SSSIs)

SA Objective		Sub-Objectives	Indicators and sources
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 space to meet community and environmental needs ▪ Improve opportunities for recreation and play ▪ Promote a clean well – maintained public realm ▪ Promote a high quality of sustainable urban design 	<ul style="list-style-type: none"> ▪ Area (in hectares) of townscape protected by local landscape designations (Green Belt, special landscape area and conservation areas) ▪ Distribution and area of National Parks ▪ Number of eligible open spaces managed to Green Flag standards (Civic Trust and individual local authority websites).
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 	<ul style="list-style-type: none"> ▪ Percentage of conservation areas with an appraisal undertaken in the last 10 years ▪ Percentage of listed buildings 'at risk'
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 from car parks, roads etc.) ▪ 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 	<ul style="list-style-type: none"> ▪ Distribution of areas at risk of fluvial flooding (Environment Agency) ▪ Number of planning applications granted permission contrary to Environment Agency advice (Local Planning Authorities). ▪ Water and groundwater quality (Environment Agency). ▪ Daily domestic water use (per capita consumption, litres)

SA Objective		Sub-Objectives	Indicators and sources
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 	<ul style="list-style-type: none"> ▪ Annual emissions of greenhouse gases by end use and sector ▪ Traffic volumes (billion vehicle Km) ▪ Mode of travel to the city centre for all purposes ▪ Average household energy consumption (kWh) ▪ Percentage of major developments that generate a percentage of their energy from renewable sources ▪ Number of properties at risk from river and coastal flooding ▪ Percentage of new development with sustainable urban drainage systems (SuDS) ▪ Number of new housing units approved in Zone 2 and 3 flood risk areas
14	To protect and improve air quality	To protect and improve local air quality	Number of air quality management areas (AQMA)
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 	<ul style="list-style-type: none"> ▪ Percentage of housing on previously developed land ▪ Number and area (in hectares) of potentially contaminated sites

2.3.6 SA Objective Compatibility

The 15 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Table 2-4 and summarised below.

Table 2-4 Internal Compatibility of the SA Objectives

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1															
2	0														
3	0	0													
4	0	0	+												
5	+	+	+	0											
6	+	+	+	+	+										
7	+	+	0	0	+	+									
8	+	+	0	0	+	+	+								
9	0	0	+	?	0	+	?	0							
10	0	0	+	?	0	+	?	0	0						
11	0	0	+	?	0	+	?	0	+	+					
12	0	0	+	?	0	0	?	0	+	+	0				
13	0	0	+	?	0	0	?	0	+	+	0	+			
14	0	0	+	?	0	0	?	0	+	+	0	0	+		
15	0	0	0	?	0	0	?	0	+	+	0	+	+	0	

A number of areas of compatibility were identified between the SA Objectives, although there were some uncertainties identified which are documented in more detail below.

The compatibility was assessed as uncertain between SA Objective S4 'To ensure housing provision meets local needs' and also SA7 'To encourage sustainable economic growth, inclusion and business development' against the following SA Objectives:

- SA9 To protect and enhance biodiversity
- SA10 To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)
- SA11 To protect and enhance the cultural heritage resource
- SA12 To protect and enhance the quality of water features and resources and reduce the risk of flooding
- SA13 To limit and adapt to climate change
- SA14 To protect and improve air quality
- SA15 To ensure sustainable use of natural resources

This is because new development has the potential to adversely affect biodiversity resources through direct land take, landscape and heritage resources from inappropriate siting and water resources through an increase in water consumption and development in the floodplain. In addition new development requires the use of natural resources, raw materials and energy, and can increase pressure upon waste management.

These areas of potential conflict were considered when undertaking the appraisal of the Local Plan policies to ensure that appropriate mitigation was included within the policy wording to address any potential conflicts between new development and protection of the environment.

2.4 Stage B: Developing and Refining Options and Assessing Effects

Options Assessment

The Planning Advisory Service's online Plan-Making Manual identifies that Stage B of the SA process corresponds to developing and assessing the options. Further guidance on how to undertake this is presented in the Government's Practical Guide to the SEA Directive (ODPM 2006).

Drawing upon (and adding to) this guidance, the approach adopted included the following steps:

- 1 High-level review of the Plan Options against the SA Objectives
- 2 Preparing a series of recommendations to assist the LLDC in further developing the Plan Options.

The development of the Local Plan considered options relating to the Vision, Objectives, policies and site allocations. An alternative options form was filled in for each policy, objective, site allocations. The form set out the preferred option wording, reasons for selecting the preferred options, alternatives and why this was not chosen. If no alternatives were considered, then this is also explained in the form. The preferred options and alternatives were assessed against the SA Objectives and the matrix table provides commentary and recommendations for further development. Notations used in the assessment of the options and policies are presented in Table 2-5 below.

Table 2-5 Notations used in the appraisals

Major Positive Impact	The option/strategy/design principle strongly supports the achievement of the SA Objective.	++
Positive Impact	The option/strategy/design principle partially supports the achievement of the SA Objective.	+
Neutral/ No Impact	There is no clear relationship between the option/strategy/design principle and / or the achievement of the SA Objective or the relationship is negligible.	0
Positive and negative outcomes	The option/strategy/design principle has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term negative impact but a longer term positive impact.	+/-
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	?
Negative Impact	The option/strategy/design principle partially detracts from the achievement of the SA Objective.	-
Major Negative Impact	The option/strategy/design principle strongly detracts from the achievement of the SA Objective.	--

L-T	Effects likely to arise in 10-25 years of Local Plan implementation
M-T	Effects likely to arise in 5-10 years of Local Plan implementation
S-T	Effects likely to arise in 0-5 years of Local Plan implementation
D	Direct effects.
I	Indirect effects.
R	Effects are reversible
IR	Effects are irreversible
H/M/L	High, medium or low certainty of prediction
C	Potential to have cumulative effect with other proposals or plans on this objective

2.4.1 Assessing the Effects of the Local Plan

The findings of the options assessments were fed back to the plan-makers. The options were subsequently developed and refined.

The Local Plan has been assessed against the SA Objectives in order to determine the overall sustainability performance of the document. The following elements of the Local Plan have been assessed:

- Vision and Objectives
- Strategic Policies and Detailed Policies
- Sub Areas Policies and Site Allocations

The detailed appraisal used SA matrices where each objective, policy or site allocation was assessed against the SA Objectives. Commentary and recommendations, such as mitigation measures were provided to improve the Local Plan's sustainability performance.

2.4.2 Mitigation

Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified.

As the Local Plan has been developed in parallel to SA process, mitigation measures have been incorporated on a continual basis.

2.4.3 Appraisal of Cumulative and Synergistic Effects

The SEA Directive requires *inter alia* that cumulative effects should be considered. It stipulates consideration of "*the likely significant effects on the environment...*" and that "*These effects should include secondary, cumulative, synergistic...effects*" (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).

- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect.
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

The potential for cumulative, synergistic or secondary or indirect effects as a result of the Local Plan has been inherently considered within the appraisal, the findings of which are presented in Section 4.7.

2.4.4 Appraisal of Transboundary Effects

The SEA Directive also requires SAs to consider the transboundary effects of the plan on other EU member states. These effects have been noted where appropriate throughout the assessment.

2.4.5 Technical Limitations and Uncertainties

During the assessment of the Local Plan, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts.

In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas, and could potentially be filled through the use of the monitoring framework.

Finally, the Local Plan essentially acts as a guidance document for the future development of the LLDC area. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured.

2.5 Stage C: Preparation of the SA Report

This SA Report presents the findings of the assessment to-date including the information collated in Stage A and during scoping, and documents the entire SA process. The results of the appraisal together with any mitigation measures proposed are recorded in the remaining chapters of this document. The SA Report also includes a separate NTS.

2.6 Stage D: Consultation on the Local Plan and the SA Report

This SA Report has now been issued for the informal consultation alongside Local Plan to key stakeholders for comment. Following the close of the consultation period, LLDC will review the feedback and revise the plan as appropriate. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the Local Plan formal consultation in the summer of 2014, when the Local Plan and the draft SA will be issued to all key stakeholders (including statutory consultees and the public).

2.7 Stage E: Monitoring the Significant Effects of Implementing the Local Plan

The SEA Directive requires that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified and remedial action is implemented accordingly.

Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5. Monitoring will be undertaken following adoption of the Local Plan.

3 APPRAISAL OF THE ALTERNATIVES

3.1 Vision and Objectives

Alternative Visions and Objectives were considered during the development of the Local Plan. Table 3-1 below lists the preferred option and alternatives as well as the reasons why the alternatives were not chosen. The more detailed assessment of alternative options is presented in Appendix C. In some cases, no alternatives were considered as this would result in a policy approach that would not be in general conformity with the London Plan. These objectives are listed below:

- Objective 5 - health and wellbeing,
- Objective 6 - urban design and design quality,
- Objective 7 - creating inclusive places
- Objective 11- climate change and energy
- Objective 12 – open space and biodiversity
- Objective 14 - convergence

Table 3-1 Summary Appraisal of Vision and Objectives

Preferred Vision and Objectives	Alternatives not selected	Reasons why not selected	SA Comments
Vision: Creating jobs and communities – proposes a new capital for East London where new centres and neighbourhoods reconnect communities and provides for development that focuses on economic growth.	Alternative 1: Emphasis on housing delivery with lower emphasis promoting business and employment growth	Emphasis on housing delivery would not represent the economic growth function of the area.	The preferred option performed particularly well against the economic objectives (SA Objectives 6, 7, and 8). Alternative 1 is less likely to contribute to economic objectives because it sets out a housing led approach to growth. Both alternatives scored positively against 1 SA Objective 4 but alternative 1 recorded a higher score.
Objective 1, Business growth	Alternative 1: Prioritising housing delivery over business growth.	Emphasis on housing delivery would not represent the economic growth function of the area.	Same as above.
Objective 2 – Jobs	Alternative 1: Alternative as for the Plan Vision, which is prioritising housing delivery over business growth	A different balance in approach would reduce the ability to optimise employment growth and access to jobs	Same as above

Preferred Vision and Objectives	Alternatives not selected	Reasons why not selected	SA Comments
Objective 3: Housing – to secure a wide range of housing types....	Alternative 1: Alternative as described in the Local Plan Vision as a whole – where the focus is on economic growth but also include a series of well-connected neighbourhoods	-	The preferred objective and the alternative both scored positively against SA 4 (housing). They also have indirect positive effects on SA 3 (health and well-being).
Objective 4, Education – to secure provision of excellent education facilities and opportunities... to meet the needs and aspirations of its population and contribute to meeting the education and training needs of the population in surrounding areas	Alternative 1 –Provision of education facilities that only serves the projected population from the new development in the area	This alternative would not aid integration of new and existing communities and would not be consistent with the Strategic Regeneration Framework ‘convergence’ agenda.	The preferred option would benefit more people and would have a higher score against SA Objective 2 (improve levels of educational attainment for all age groups and all sectors of society).
Objective 8 – Creating Neighbourhoods – to expand and create new neighbourhoods...with good links to the amenities and facilities available in the wider area.	Alternative 1 – To focus development around only the existing communities within and around the LLDC area.	This alternative is not seen as a viable approach as the scale and type of development will result in new communities only around existing ones.	The preferred option performed better against the SA Objective 5, since it would ensure that there are good links to amenities and facilities whereas the alternative may not have as good access and may put pressure on facilities and amenities within the existing communities.
SA Objective 9 – Area characters and the historic environment – to create a new place in London comprising of distinctive neighbourhoods	Alternative 1 – to treat the Legacy Corporation area as a single character area.	This alternative would not reflect the existing differences in character and place, for example, between Hackney Wick and Stratford.	The preferred option performs better against SA Objectives 10 (To protect and enhance townscape character and quality) and 11 (To protect and enhance the cultural heritage resource)
SA Objective 10 – Sustainability – to draw together the strands of	Alternative 1: Focused only on environmental	This would reflect the corporate Environmental Policy	The preferred option performs well against social, economic and

Preferred Vision and Objectives	Alternatives not selected	Reasons why not selected	SA Comments
<p>economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area....</p>	<p>sustainability.</p>	<p>of the LLDC but not its wider regeneration remit that includes contributing to delivery of the aspirations of the Strategic Regeneration Framework.</p>	<p>environmental objectives. The alternative will perform better against the environmental SA Objectives: 9 (biodiversity), 10 (townscape character), 11 (cultural heritage), 12 (water features and resources), 13 (climate change), 14 (air quality) and 15 (sustainable use of natural resources) but will score negatively against the social and economic objectives.</p>
<p>Objective 13 –Transport and Connectivity – to seek to maximise growth within the boundaries of existing transport capacity and that of committed projects to improve capacity, while maximising opportunities for local movement...and facilitating local connectivity...</p>	<p>Alternative 1: Growth in transport capacity provision beyond current planned levels to further increase potential development capacity.</p>	<p>This alternative would involve delivery of uncommitted and unidentified transport projects and would not allow achievement of the balance development scenario set out in the vision and would change the overall character and balance in development types and required infrastructure and amenities required.</p>	<p>Both options will have positive effects on the SA Objective 5 – to improve sustainable access to jobs, basic goods, services and amenities for all groups. However, the alternative 1 could have negative effects on SA Objective 15, to ensure sustainable use of natural resources since resources will be used inefficiently. Also, if the transport infrastructure is developed before other elements – such as housing, this may have a negative effect on SA Objective 10, the townscape character.</p>

3.2 Alternative Policies

Alternative Policies were considered during the development of the Local Plan. Appendix D provides details on the preferred options and alternatives as well as the reasons why the alternatives were not chosen. In many cases, no alternatives were considered as this would result in a policy approach that would not be in general conformity with the London Plan or with other high tier planning documents. Some of the alternative options considered are 'business as usual' options where the alternative is not to include the policy in question in the Local Plan. A summary of the 'business as usual' option is provided in Section 3.4.

The detailed appraisal against the SA objectives of the preferred policy options and alternatives is presented in Appendix E and a summary of the findings is presented in Table 3-2 below.

Table 3-2 Summary Appraisal of Policies and Alternatives

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
Strategic Policy SP1: Business, Economy and Employment.	Alternative 1: Emphasis on housing delivery with lower emphasis promoting business and employment growth	Emphasis on only housing delivery would not provide a balanced approach to new development, meeting both employment needs and housing needs within east London and more widely	The preferred option performs particularly well against the economic objectives (SA Objectives 6, 7, and 8). Alternative 1 is less likely to contribute to economic objectives because it sets out a housing led approach to growth.
Policy BEE.4 Employment uses in other locations	Alternative 1: Not protecting the existing employment floorspace, outside of specifically designated areas Alternative 2: Promoting change to housing	Potential loss of a significant level of employment generating floorspace.	Same as above.
Policy BEE.5 Mixed use locations.	Alternative 1: Encouraging a housing focus in all locations outside of the protected employment areas	Emphasis on only housing delivery would not provide a balanced approach to new development, meeting both employment needs and housing needs within east London and more widely	Same as above.
Policy BEE.7: Town, Neighbourhood and Local Centres.	Alternative 1: Designate the existing centre at Stratford and not promote new more local centres.	Lack of coherence in retail and service provision for local communities; it would also leave only a partly designated neighbourhood centre at Hackney Wick/Fish Island.	The preferred option performs well against the economic objectives (SA Objectives 7 and 8). Alternative 1 is less likely to contribute to economic objectives because it concentrates employment and retail activities only at one existing centre.
Policy BEE.11: Schools	Alternative 1: A policy that only includes criteria for accessibility and safety of the school and its location (i.e. not addressing the need for a proposed school).	The existing planned provision is potentially capable of meeting planned growth, alongside uncertainty of the level of child yield from the significant amount of new development.	As uncertainty exists of the number of children / pupils in the new residential areas it is considered that the preferred option offers an element of flexibility to base any provision on future demand. The preferred option performs well against health and sustainability access SA objectives 3 and 5.
Strategic Policy SP2: Housing	Alternative 1: Maximisation of housing delivery with prioritisation of housing over other uses	It would fail to meet the economic and employment objectives set for the area	Alternative 1 is less likely to contribute to economic objectives because it sets out a housing led approach to growth.
Policy H3: Affordable housing	Alternative 1: All affordable housing provision to be on-site	Alternative 1 would not provide flexibility in the minority of cases where off-site provision of the required quantum of affordable	There would be no significant difference between the alternative and the preferred option with regards to

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
		housing is more appropriate or more achievable in the light of viability	performance against SA objectives. The preferred option is more likely to encourage investment in new residential developments; however the level of certainty of prediction is rather low.
Policy HBE.6: Local Identity	Alternative 1: Propose a number of separate policies, for example an individual policy on conservation areas, tall buildings, and listed buildings.	Holistic approach is better suited to the diverse townscape characteristics that fall within its area.	There would be no significant difference between the alternative and the preferred option with regards to performance against SA objectives as essentially the two options will equally contribute to the SA objectives.
Strategic Policy 5: Natural Environment	Alternative 1: Focus on protecting and enhancing the Natural Environment	The Local Plan recognises the strategic value of an effective series of Green Grid and Blue Ribbon networks as part of the Natural Environment in the LLDC area and within the wider London context	There would be no significant difference between the alternative and the preferred option with regards to performance against SA objectives. The preferred option is more specific in its definition therefore it provides more clarity with regards to its purpose.
Policy NE1: Integrating the built and natural environment.	Alternative 1: State in the second paragraph of the policy: “maximising opportunities” for inclusion of habitat and species, rather than “maximising the provision”.	Proposal for development would be able to set up the opportunity to include habitat and species within a development, rather than actually providing new areas of habitats and species.	Both options will have positive effects on the SA Objective 9 – to protect and enhance biodiversity. The preferred option will provide more opportunities for mitigation measures within proposals of new developments which may encourage investment in the areas yet to be developed.
Policy NE4: Flood Risk.	Alternative 1: Specify the level of reduction in surface water run-off required in certain instances, e.g. 50%.	Due to the variety in topography in the Legacy Corporation area and the costs that developers could therefore incur by stipulating such a reduction, there is a risk that this would make certain sites and schemes undeliverable. As a result, whilst stipulating a reduction in surface water run-off and appropriate flood risk management measures, the option chosen is seen as favourable.	Depending on the location of the site the preferred option would provide more flexibility for developers to implement flood risk mitigation measures. Therefore it is considered that the preferred option is more likely to encourage investment in new residential developments and performs well against housing and economic SA objectives without detracting from flood risk SA objectives 12 and 13.
Policy NE5: Biodiversity	Alternative 1: State the importance of not breaking any existing habitat, rather than outlining the importance of not breaking any existing wildlife corridor.	Due to the context of the LLDC area, where different habitats join and evolve to form unique and significant wildlife corridors through the area and East London, and in support of the Strategic Policy for achieving an effective series of Green Grid	The preferred option performs well against biodiversity SA objective 9 as it ensures that both important wildlife corridors and valuable habitats are protected. In that sense the preferred option would

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
		and Blue Ribbon networks, it was decided that it is important to emphasise both the protection of wildlife corridors and habitats.	more strongly support the achievement of the SA objective.
Policy NE9: Metropolitan Open Land	Alternative 1: When defining the area of MOL on the Policies Map replicate the areas of MOL already designated within borough Local Plans.	Reviewing the areas identified as MOL based on the London Plan policy criteria and identifying new areas was chosen as a preferred option as the area appropriate for MOL designation has been increased due to the introduction of the Queen Elizabeth Olympic Park.	The preferred option performs well against health biodiversity and townscape SA objectives (3, 9, and 10) with some indirect beneficial effects on reducing the flood risk in area and improving the air quality in the long term. The preferred option is considered to be more sustainable than the alternative due to the increased size of designated Metropolitan Open Land.
Policy NE10: Local Open Space	Alternative 1: Only designating Local Open Spaces that already have some form of local protection in existing plans.	The level of change in the area has resulted in the delivery of new appropriate open spaces.	Same as above.
Policy NE12: Play Space	Alternative 1: Focus solely on playgrounds or playing fields, with the policy relating specifically to these sites.	This would not to capitalise on the opportunities for play across the public realm and not make use of the variety of open spaces where play can be encouraged.	There would be no significant difference between the alternative and the preferred option with regards to performance against SA objectives. Alternative 1 would result in similar effects as the Preferred Option. The alternative is more narrowly focused on formal play areas and not on other areas of public open space. Therefore, there may be slightly lower benefits in terms of health and access to amenities.
Strategic Policy SP7: Transport and Connectivity	Alternative 1: Support more suburban scale of development with more space provided for private cars.	This was considered not to capitalise on the areas connectivity by not making use of the high public transport capacity. It would also be difficult to accommodate such an increase in the volume of private cars on the surrounding road network.	The preferred option will have positive effects on the SA Objective 5 – to improve sustainable access to jobs, basic goods, services and amenities for all groups. In addition, it will contribute indirectly to the achievement of SA objective 14 (air quality) as it will encourage people to use already well developed public transport network in the area and reduce the need to travel by private car.
Policy T2: Strategic Transport Improvements	Alternative 1: Not having a policy seeking to secure stopping international trains, a rail link to High Speed 2 or improved	These Strategic Transport Improvements are considered necessary to make Stratford and an even better place to work, live and invest.	The preferred option performs very well against economic and employment SA objectives (7 and 8) as well as sustainable access SA objective 5 as it

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
	connections to airports		encourages business development and investment and will reduce the overall deprivation levels in the area in the long term.
Policy T3: Parking and Parking Standards	<p>Alternative 1: Adopt the existing borough standards for the corresponding parts of the LLDC area.</p> <p>Alternative 2: Develop separate LLDC specific standards without reference to the London Plan.</p>	<p>Impractical within such a small area, and the wider boroughs standards may not necessarily be reflective of the character of the smaller individual parts of the LLDC area.</p> <p>Following the London Plan standards with a criteria based policy which adapts it to local circumstances was a sensible one given the small size of the LLDC area and would meet the objectives of having parking provided to standards appropriate to the scale, type and location of development.</p>	There would be no significant difference between the alternative and the preferred option with regards to performance against the SA objectives. The preferred option performs slightly better against SA objective 5 as parking standards will be tailored to local needs and circumstances.

3.3 Alternative Options Sub Areas/Site Allocations

Alternative options were also considered with regards to the identified four Sub Areas in the Local Plan and a number of Site allocations within these Sub Areas. It was recognised that certain limitations exist for considering more alternatives with regards to the proposed Sub Areas and Site Allocations as planning permissions have already been granted for the majority of sites. Details on the preferred options and alternatives of the four Sub Areas and Site Allocations are provided in Appendix D, as well as the reasons why the alternatives were not chosen. Where an alternative option to the Sub Area policy/site allocation was considered, the performance of the preferred option and alternative were assessed against the SA objectives using the sustainability matrix in Appendix G. Each proposed site allocation was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

A summary of the sustainability appraisal results of the preferred and alternative options is provided in the following sections.

Sub Area 1

No specific alternatives for the Sub Area Vision were considered as these were explored and discounted through the AAP preparation process in line with consultation responses, evidence and sustainability appraisal. The Legacy Corporation's vision for Sub Area 1 refines this already established approach.

The only alternative option within the Sub Area policies is related to Policy SA1.4 Heritage-led Regeneration where an alternative option would be to encourage purely residential or employment-led regeneration. However, it was considered more appropriate that no one use should predominate in the Sub Area in accordance with other policies in the Local Plan.

Sustainability Comments: The preferred option performs particularly well against SA objectives 10 and 11 relating to the enhancement of townscape quality and protection of cultural heritage. Alternative 1 is less likely to contribute to SA objectives 10 and 11 because purely housing-led or employment-led approach may result in loss of the distinct sense of place of the area.

Each proposed site allocation in Sub Area 1 was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

Sub Area 2

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

Sustainability Comments: Each proposed site allocation in Sub Area 2 was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

Sub Area 3

An alternative option for the Sub Area 3 Vision was not to propose the extension of the existing town centre which would encompass the retail, leisure and commercial district of Westfield Stratford. It was discounted as this would weaken the case for Stratford as a whole being defined as a Metropolitan Centre within the London Plan. It would also weaken the case for improving links between these locations and the areas of Stratford outside of the Legacy Corporation area.

Sustainability comments: The preferred option is in accordance with other policies previously considered in the Local Plan. The alternative option is less likely to contribute to the economic objectives because it offers fewer employment and retail opportunities within the LLDC area.

Promoting only residential and subsidiary uses within the Sub Area was an alternative option for policy SA3.2 Cultural and Education facilities. The alternative was discounted as it was considered that it would not reflect the overall vision and strategy set out within the Local Plan and would not maximise the economic growth element of that strategy.

Sustainability comments: The alternative option performs well against SA objective 4 because it sets out a housing led approach to growth. However, the preferred option would contribute to the achievement of more SA objectives as it is likely to result in positive effects with regards to health, education, and overall deprivation levels.

An alternative option of not permitting interim uses of land (SA3.3: Interim Leisure, Cultural and Event Uses) has been discounted as this will risk the land being unutilised and provide a poor quality and unattractive environment along key routes in the area.

Sustainability comments: The alternative option may result in some negative effects with regards to the economic SA objectives as the land would be underutilised and is likely to create an unattractive business environment prior to the delivery of later phases of permanent development.

Site Allocations

Within the Site Allocations included in Sub Area 3 the following alternatives were considered and rejected in the assessment process:

- Chobham Farm South: The alternative option of allocating the site for development without the completion of a link to the town centre bridge was rejected as this link will help to improve access and the range of options for acceptable forms of development.

Sustainability comments: The preferred option performs well against SA objective 5 related to sustainable access to amenities for all groups. The alternative option is less likely to contribute to the achievement of the economic SA objectives because it provides limited opportunities for development of the site thus attracting less investment in the area. Moreover, it may result in worsening of the deprivation levels due to restricted access to amenities.

- Stratford Waterfront East (PDZ1): The option of only reflecting the approved form of development in this location, with no additional flexibility was discounted as the provision of greater flexibility provides an opportunity for accommodating specific significant proposals within the final form of development that could contribute to the wider economic and culturally significant role of this location (i.e. the retained Olympic Venues and Parkland).

Sustainability comments: The preferred option performs well against SA objective 3 and 4 related to health benefits and housing supply. In addition, the preferred option is more likely to contribute to the achievement of the economic SA objectives through the flexible option to introduce conference centre, institutional or educational uses on the site.

- Rick Roberts Way: The alternative of only reflecting the Legacy Communities Scheme permitted floorspace scenario was discounted as the identification of the Gas Holder site opens the potential for a wider and more comprehensive development scenario. It also reflects the flexibility of location for the school that is built into the Legacy Communities Scheme Planning Permission.

Sustainability comments: The preferred option performs well against SA objectives 2, 3 and 4 related to an improved education attainment, health benefits and housing supply. In addition,

some positive effects on biodiversity are likely to occur through the remediation of contaminated land in the south section of the area. The alternative will result in similar effects as the preferred option with unknown performance against SA objective 9 (biodiversity) as it is unclear from the description whether the contaminated land will be remediated in the long term. It would be beneficial to include more information about the potential access to amenities from the surrounding areas.

Sub Area 4

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

Sustainability Comments: Each proposed site allocation was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

3.4 Appraisal of the 'No Plan' / 'Business as Usual' Option

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

In the absence of more detailed LLDC specific policy, there is likely to be much greater uncertainty over requirements that proposals for new development will need to address. Whilst the Core Strategies, Land Allocations DPDs and AAPs of the four London Local Authorities would provide a significant guidance to development types and locations, there is a need to ensure that policy is consistent and up to date across the LLDC area as a whole to provide certainty about how development should be designed (as provided through the Local Plan).

There would therefore be a greater likelihood of development being less sustainable and of adverse environmental, social or economic effects occurring. Whilst the Core Strategy and Land Allocations DPDs should help direct inappropriate development away from environmentally sensitive locations, the Local Plan has a key role to play in, for example, micro-sitting, the scale or form of development, energy and materials use, the appearance of structures, parking, access to sustainable transport, the impact on local environmental and built heritage features amongst a number of other issues. In particular, without a consistent set of planning guidance in this form, there would be a greater likelihood of a number of smaller adverse effects occurring which could lead to greater overall cumulative effects.

Similarly, there would be a lower likelihood of opportunities being met in order to alleviate the area's existing social and economic issues. For example, there would be less guidance on the type of housing that should be developed to meet identified needs, or on measures to help improve the sustainable access to community facilities.

It is also likely that the planning and consenting process would be slower given that decisions would need to rely more upon a wider suite of policy and guidance where it is available (e.g. national, regional, international).

4 APPRAISAL OF THE LOCAL PLAN

4.1 Introduction

This section outlines the results of the appraisal of the Local Plan including details of mitigation measures that could be implemented to improve the performance of the plan.

4.2 Appraisal of the Vision for the Legacy Corporation Area

The LLDC Local Plan contains a Vision that indicates how the borough will look in 2031. The Vision comprises:

Creating Jobs and Communities

Driving the transformation of east London, the world class sporting venues, parklands, and internationally recognised business and leisure opportunities within the Legacy Corporation area will be complemented by inward investment into leading edge 21st Century industries, including creative and design businesses and institutions, higher education and research activity, making Stratford a major new commercial and office district of more than metropolitan importance. A place of major cultural and leisure attractions, with clusters of creative industry and smaller scale bespoke manufacturing alongside new neighbourhoods and community facilities, the Legacy Corporation area will create new employment and business opportunities for east Londoners and, with exceptional new schools, health and community facilities, a place of choice for them to live and work.

Centred around Queen Elizabeth Olympic Park, as one of London's most dynamic and unique urban districts, the Legacy Corporation area will become a new capital for East London, where new centres and neighbourhoods reconnect communities, attract visitors and investment, and provide a focus for development that will bring economic growth, new jobs and new homes, in a well designed built environment that is accessible to and useable by all. The London 2012 legacy of infrastructure, restored waterways and well designed open spaces will set the bar for environmental quality and set the scene for sustainable growth. This will enable local communities to develop, grow and integrate, providing a platform for community innovation and enterprise.

In addition to excellent education, health and other community infrastructure being available within the area, development will have driven an improvement in the quality and accessibility of the existing local environment and contributed to the mitigation of climate change through delivery of sustainable buildings and open spaces, the availability of locally generated heat and power and the high level of accessibility to public transport, local shops and services.

Taken together, the many aspects of the Legacy Corporation area will make a substantial contribution to enabling East London residents to achieve at least the London average in key social and economic indicators of quality of life.

4.2.1 Results of the SA of the Vision

There is an emphasis within the Vision to create 'a new capital for East London, where new centres and neighbourhoods reconnect communities' that 'will bring economic growth, new jobs and new homes' which would positively fulfil many of the social and economic SA Objectives, as creating such a place would improve local housing, encourage economic growth and increase employment opportunities. This would be particularly beneficial for surrounding areas which currently suffer with elevated levels of deprivation. Levels of deprivation would further benefit from provision of high quality education opportunities and facilities, from early years to higher education and research within the LLDC area. Ultimately the creation of neighbourhoods would also contribute to creating happy and healthy communities. However, the Vision does not specifically mention that affordable housing will form part of new residential development which has been identified as a specific need in the area.

The Vision affirms that the LLDC area is one of London's most dynamic and unique urban districts that will provide cultural and leisure attractions, along with world class sporting venues. This would not only benefit economic growth in the LLDC area but would also offer health benefits and facilitate much needed general regeneration of surrounding areas.

Climate change would also benefit under the Vision through promoting adjacency of homes and jobs along with a commitment to maximise connectivity of the LLDC area with surrounding areas through sustainable transport links. This may also encourage a model shift encouraging people to leave their private cars at home and opt for a more sustainable travel choice i.e. walking, cycling or taking the train to access the LLDC area.

With regards to the environment (other than mitigation against climate change) the Vision seeks to ensure that the LLDC area provides a well-designed built environment that is readily accessible and provides areas of open space. However, it does not explicitly mention the need to protect and enhance the natural environment such as watercourses, wildlife sites (or local wildlife) and other Green Infrastructure. In addition the Vision does not specifically mention the need to protect the historic environment (including heritage assets), a need to protect and enhance townscape character and quality (although this is indirectly inferred to) or protect and enhance the quality of water features and resources.

4.2.2 Recommendations and Mitigation Potential

It is recommended that the Vision is amended to ensure the following:

- The Vision could be strengthened to ensure it includes a commitment to ensuring an element of affordable housing is provided within the LLDC area i.e. 'provide a focus for development that will bring economic growth, new jobs and new homes (*including an element of affordable homes*) in a well-designed built environment'. However, it is recognised this need is provided within the Objectives and that the Local Plan should be read as a whole.
- There should also be a clear commitment within the Vision to the protection and enhancement of biodiversity resources, heritage assets and townscape character and quality. However, as above, it is recognised this need is provided within the Objectives and that the Local Plan should be read as a whole.

4.3 Appraisal of the Objectives

The Local Plan contains 14 Objectives to deliver the Vision outlined in the section above. They comprise:

1. **Business growth:** secure provision of a significant range of types and sizes of work space to enable a range of businesses to locate, develop and expand within the Legacy Corporation Area, with significant business hubs developing in particular locations within the Plan period, providing a platform for community innovation and enterprise, while maximising the opportunities provided to utilise the Queen Elizabeth Olympic Park and transformed Olympic venues as an international visitor attraction that will support business growth across the area.
2. **Jobs:** secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.
3. **Housing:** secure a wide range of housing types, including a significant element of family homes through the development of suitable sites within the Legacy Corporation area that are affordable for those on a wide spectrum of incomes, balancing the aspirations of new communities and helping to meet the housing need generated in the surrounding areas and more widely across London.
4. **Education:** secure provision of excellent education facilities and opportunities, ranging from nursery and early years to Further and Higher Education, including employment skills and training, within the Legacy Corporation Area that meet the needs and aspirations of its population and contribute to meeting the education and training needs of the population in surrounding areas.
5. **Health Culture and wellbeing,** seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games and a strong sense of cultural wellbeing through participation in recreation, creative and cultural activities .
6. **Urban Design & Design Quality:** achieve an excellent quality of design for new buildings and within the wider urban landscape, including streets and public spaces and other open spaces, maintaining and, where necessary, improving the quality of those spaces, with a focus on the character of the location and its integration and connections with its surroundings.
7. **Creating inclusive places:** seek to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.
8. **Creating Neighbourhoods:** to expand existing and create new neighbourhoods which are good places to live and work and provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.
9. **Area characters and the historic environment:** To create a new piece of London comprising of distinctive neighbourhoods, which draw upon the existing character of established areas, including their cultural assets, and respect the historic aspects of the built environment, particularly where there are conservation areas, and nationally and locally listed buildings.
10. **Sustainability:** to draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimises the opportunity for negative environmental and social effects.

- 11. Climate change and energy:** contribute to the Mayor’s target of achieving “an overall reduction in London’s carbon dioxide emissions of 60% (below 1990 levels) by 2025”⁵, by improving the energy efficiency of buildings, increasing the use and availability of decentralised energy within the Legacy Corporation Area and minimising the need for vehicular travel.
- 12. Open space and biodiversity:** using the open space, waterways and biodiversity legacy of the Queen Elizabeth Olympic Park to tie the area effectively into the London Green and Blue Grids, protecting and seeking enhancement of identified locations.
- 13. Transport and Connectivity:** seek to maximise growth within the boundaries of existing transport (including highway, rail and waterway) capacity and that of committed projects to improve that capacity, while maximising the opportunities for local movement by foot and bicycle, facilitating improved local connectivity where required to achieve this.
- 14. Convergence:** contribute to meeting the aims of the Convergence Objectives of:
- Creating wealth and reducing poverty;
 - Supporting healthier lifestyles; and
 - Developing successful neighbourhoods.

4.3.1 Results of the SA of the Objectives

Table 4-1 presents the compatibility of the Local Plan Objectives against the SA Objectives.

Table 4-1 Compatibility of the SA Objectives and the Objectives

SA Objectives	LLDC Local Plan Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1 To reduce crime, disorder and fear of crime	✓	✓	✓	✓	0	✓	0	✓	0	✓	0	0	0	✓
2 To improve levels of educational attainment for all age groups and all sectors of society	✓	✓	0	✓	0	0	0	0	0	✓	0	0	✓	✓
3 To improve physical and mental health and wellbeing for all and reduce health inequalities	0	0	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓
4 To ensure housing provision meets local needs	0	0	✓	0	✓	0	0	✓	0	✓	0	0	0	✓
5 To improve sustainable access to jobs, basic goods, services and amenities for all groups	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

⁵ London Plan (July 2011), Policy 5.1 Climate Change Mitigation

SA Objectives	LLDC Local Plan Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
6 To reduce poverty and social exclusion whilst promoting social inclusiveness and equality	✓	✓	✓	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓
7 To encourage sustainable economic growth, inclusion and business development	✓	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓
8 To increase employment opportunities for all residents in the local area	✓	✓	0	✓	✓	0	0	✓	0	✓	0	0	✓	✓
9 To protect and enhance biodiversity	?	0	?	0	✓	✓	0	0	0	✓	0	✓	✓	0
10 To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	?	0	?	0	✓	✓	?	✓	✓	✓	0	✓	✓	0
11 To protect and enhance the cultural heritage resource	?	0	?	0	✓	✓	0	0	✓	✓	0	0	0	0
12 To protect and enhance the quality of water features and resources and reduce the risk of flooding	✗	0	✗	0	0	0	0	0	0	✓	0	✓	0	0
13 To limit and adapt to climate change	✗	✓	✗	0	0	✓	0	✓	0	✓	✓	0	✓	0
14 To protect and improve air quality	?	✓	?	0	0	✓	0	✓	0	✓	✓	0	✓	0
15 To ensure sustainable use of natural resources	?	0	?	0	0	0	0	0	0	✓	0	0	0	0

Key

✓ = Objectives are compatible

✗ = Objectives are potentially incompatible

0 = There is no link between Objectives

? = The link between the objectives is uncertain

Sustainability Comments

Each of the Objectives was assessed against the SA Objectives in a compatibility matrix to determine their compatibility and to identify any potential areas where new Objectives need to be established or the existing ones clarified.

On the whole the Objectives and the SA Objectives were either compatible or no links between the Objectives could be established. However, a number of potential conflicts were identified relating to Objectives a 'business growth' and c 'housing'. This was because business growth within the LLDC area and housing growth would both increase water consumption and may also exacerbate current flood risk issues.

In addition to areas of potential conflict, some areas of uncertainty were also identified against Objectives 1 - 'business growth' and 3 - 'housing' against the following SA Objectives:

- SA Objective 9 'To protect and enhance biodiversity';
- SA Objective 10 'To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)';
- SA Objective 11 'To protect and enhance the cultural heritage resource';
- SA Objective 14 'To protect and improve air quality'; and
- SA Objective 15 'To ensure sustainable use of natural resources'.

Compatibility was assessed as uncertain, as business growth and new housing have the potential to lead to adverse effects on biodiversity resources, townscape character and quality, heritage assets, increase traffic movement if not appropriately developed and an increase in the use of natural resources and waste production. However, the Objectives should be read as a whole and not individually, therefore biodiversity, heritage assets, townscape resources and air quality would all be protected through other Objectives. Objective 10 'Sustainability', although not explicitly mentioned may also ensure business growth and new housing development minimises natural resource use and maximises opportunities to reduce waste production.

4.3.2 Recommendations and Mitigation Potential

It is recommended that the Objectives are amended to ensure the following:

- Within the Objective there is no clear commitment to ensuring SuDS are incorporated into new development to ensure flood risk within the LLDC area is not exacerbated nor is there specific reference to minimising the use of water resources. It is therefore recommended that these elements are incorporated into the Objectives.
- In addition, there should be a clear commitment that business growth and new housing development minimises the use of natural resource use and maximises opportunities to reduce waste production.

4.4 Assessment of Policies

The LLDC Local Plan contains a series of Strategic and Detailed Policies designed to guide development in the LLDC area. [Table 4-2](#) presents the groups of policies that have been assessed.

Table 4-2 Strategic and Detailed Policies of the LLDC Local Plan

Strategic and Detailed Policies	
SP1: Business, Economy	BEE1 Business & Employment hubs

Strategic and Detailed Policies	
and Employment	BEE2 Strategic Industrial Land
	BEE3 Locally Significant Industrial Sites and Other Industrial Locations
	BEE4 Employment uses in other locations
	BEE5 Mixed use locations
	BEE6 Managed and affordable workspace
	BEE7 Town, Neighbourhood and Local Centres
	BEE8 Retail and commercial uses outside of designated centres
	BEE9 Jobs and skills and employment training
	BEE10 Higher Education, Research and Development
	BEE11 Schools
	SP2 Housing
H2 Residential Development Principles including Alterations and extensions	
H3 Affordable Housing	
H4 Specialist Housing needs	
H5 Houses in Multiple Occupation (HMO)	
H6 Institutional investment in the Private Rented Sector	
SP3: The Built Environment SP4: The Historic Environment	HBE1 Designating Protected Views
	HBE2 Inclusive Design
	HBE3 Designating Conservation Areas
	HBE4 Local Listing
	HBE5 Archaeology
	HBE6 Local Identity
	HBE7 Energy Hierarchy
	HBE8 Sustainable Design and Construction
SP5: Infrastructure to Support Growth and Convergence	IN1 New and Existing Community Infrastructure
	IN2 Energy Infrastructure and heat networks
	IN3 Water Supply and Sewerage Infrastructure
	IN4 Waste Management
SP6: The Natural Environment	NE1 Integrating the built and natural environment
	NE2 The natural environment and Health and Well-being
	NE3 The Waterways
	NE4 Flood Risk
	NE5 Biodiversity
	NE6 Land Quality and Contaminated Land

Strategic and Detailed Policies	
	NE7 Air Quality
	NE8 The All London Green Grid
	NE9 Metropolitan Open Land (MOL)
	NE10 Local Open Space
	NE11 Parks and Parklands
	NE12 Play Space
SP7: Transport and Connectivity	T1 Local Connectivity
	T2 Strategic Transport improvements
	T3 Parking and Parking Standards
	T4 Provision for pedestrians and cyclists
	T5 Transport Assessments and Travel Plans
	T6: Road Hierarchy
	T7 Transport Improvements
	T8 Supporting Transport Schemes
	T9 The Transport function of the Waterways

Each of the Policies was assessed against the SA Objectives using the appraisal matrix Table 2-5 to identify any significant adverse or beneficial effects. The more detailed appraisal of the Policies is included in Appendix F and the summary of the sustainability comments is provided in the section below.

4.4.1 Sustainability comments

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

The policies relating to Business, Economy and Employment perform very well against the sustainability criteria used in the appraisal and would lead to both direct and indirect benefits. Direct benefits would occur in relation to improved employment opportunities, economic inclusion, long-term economic benefits and an improved education attainment for all age groups. Other indirect benefits will occur as a result of the creation of improved public realms attracting more visitors, residents and businesses, which could indirectly benefit crime and health, and also reduction in carbon emissions in the long-term through the promotion of mixed use developments. Indirect benefits in terms of greenhouse gas emissions and air quality could also be realised through the implementation of travel plans for new schools and by focussing new leisure facilities in locations where public transport is available.

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

The housing policies directly seek to ensure the provision of a range of housing types including affordable housing, ensuring both market and affordable housing needs are met, which could indirectly encourage inward investment and economic growth. Many of the policies seek to ensure access to services including by public transport. It is ensured that the needs of specific sectors of the community such as older people and students are met, which could provide indirect benefits for their health and well-being. Gypsy and traveller sites provision is also catered for.

The built environment policies positively support many of the environmental sustainability criteria, particularly through the requirement for the sustainable design construction of new developments, maximising energy efficiency, and utilising low carbon technologies. The policies therefore directly seek to reduce carbon emissions and ensure adaptation to climate change, and indirectly contribute to a reduction in the use of natural resources and waste generation. The policies also seek to ensure that new development is well connected to other amenities and facilities, is well integrated with the existing townscape, and does not have adverse impacts on (and where possible improves) the quality of the built and natural environment. Such provisions can offer a number of social and economic benefits, for example relating to accessible jobs and encouraging inward investment. In addition, encouraging the use of public transport, walking and cycling are also beneficial by providing opportunities for individuals to pursue healthy lifestyles. The policies clearly require the design of new development to take account of existing environmental assets and reflect local townscape.

The historic environment related policies clearly provide for significant protection of the area's heritage assets and their settings, which can also benefit townscape character. The preservation of heritage assets can also encourage additional residents, employees and tourists, and act as an important learning resource.

The policy seeking to protect community infrastructure and services ensures that facilities and infrastructure are available to cope with the demand that new development will generate, water, waste and energy infrastructure could all help contribute to the long-term sustainability of the LLDC area. The energy enhancing policy contributes positively to the sustainability criteria used in the appraisal through the promotion renewable energy generation, which could generate indirect benefits to the local economy.

The policies relating to integrated water management focus upon protecting the area's water resources, and ensuring that flood risk is effectively managed as part of the development process. The protection of water quality is particularly important as there are a number of rivers across the LLDC area (Waterworks River, River Lee, River Roding) and there are flood risk issues associated with some localised areas that fall within Flood Zone 2 and 3. Flooding can have significant adverse effects on the economy and human health and wellbeing by affecting homes, buildings and services, and resulting in significant remedial costs. These policies would therefore indirectly benefit the local economy by reducing the risk of flooding pressure on the district's economy and services.

The policies relating to green infrastructure seek to ensure the existing green infrastructure network of the LLDC area is protected, which would indirectly benefit health and wellbeing. There is also potential for green spaces such as allotments to be used to promote healthy lifestyles and eating, as well as educational benefits. In addition, green infrastructure can be important green travel links (cycle routes) and enhancing these links across the LLDC area could help contribute to greater levels of walking and cycling which would have air quality, climate change as well as health benefits in the long-term. Positive environmental impacts upon water resources, soil resources, biodiversity and townscape should also occur if the policies were implemented.

The policies relating to the connectivity across the LLDC area positively contribute a number of sustainability criteria (e.g. health, access, economy, air quality) by ensuring local services are

located in areas where there is a choice of travel options (walking, cycling and public transport) and are accessible to all. Whilst the focus of this policy is not upon environmental issues, by ensuring that new services are well located in relation to existing centres, it may help to reduce the number of journeys made by car which could indirectly benefit air quality (although this depends upon the travel choices of individuals). Sustainable transport links would also improve access to existing services and facilities, and would encourage economic development and inclusion.

4.4.2 Recommendations and Mitigation Potential

It is recommended that the Policies are amended to ensure the following:

- Within the housing policies there is no clear commitment to ensuring SuDS are incorporated into new development to ensure flood risk within the LLDC area is not exacerbated nor is there specific reference to minimising the use of water resources. It is therefore recommended that these elements are incorporated into the policies.
- Safety by design principles should also be incorporated into the housing policies to ensure that crime levels do not increase as a result of the planned growth of the area and the influx of a significant number of new residents.
- There should be a clear commitment that business growth and new housing and infrastructure developments minimise the use of natural resources and maximises opportunities to reduce waste production.
- It would be beneficial if the water management policy is more explicit about the main use of the waterways as that will determine the potential effects on biodiversity throughout the plan period.
- Renewable energy infrastructure should be more explicitly promoted where appropriate to mitigate the effect of increased energy demand related to the planned level of growth.
- The LLDC area is largely located within an Area of Archaeological Importance. Therefore it is likely that major infrastructure works will have an adverse effect on archaeological resources. Detailed impact assessment of Cultural heritage assets may be required before any construction works commence.
- The Local plan includes a policy which ensures that there is no loss of any waste management facilities but does not include measures to reduce waste sent to landfill. Currently a high percentage of the waste in the area goes to landfill and landfill waste is a large source of anthropogenic methane. Reuse, recycle or compost of materials should be encouraged.

4.5 Assessment of Sub Areas and Site Allocations

The Local Plan identifies four Sub Areas for future development within the boundaries of the LLDC area. Each Sub Area description includes details of the opportunities for change, as well as the infrastructure needed to support growth. The Vision, policies and site allocations relating to each Sub Area were assessed against the SA Objectives using the appraisal matrix Table 2-5 to identify any significant adverse or beneficial effects. The more detailed appraisal of the Sub Areas is included in Appendix G and a summary table is provided in [Table 4-3](#) below.

Table 4-3 Summary Appraisal Sub Areas and Site Allocations

SA Objectives	LLDC Local Plan Sub Areas and Site Allocations																							
	Sub Areas				Site allocations																			
	1	2	3	4	Sweetwater	East wick and iCity	Neighbourhood centre	Chapman Road	Fish Island South	Fish Island North	Chobham Farm	East Village	Chobham Manor	Stratford Town Centre Extension	Chobham Farm South	Stratford Waterfront East	Stratford Waterfront West	Greater Carpenter District	Bridgewater Road	Rick Roberts Way	Bromley-by-Bow	Pudding Mill	Sugar House Lane	Three Mills
1 To reduce crime, disorder and fear of crime	+/-	-	-	-	0	0	0	0	+	+	0	0	0	+/-	0	0	0	0	0	0	+/-	+/-	+/-	0
2 To improve levels of educational attainment for all age groups and all sectors of society	+/-	+	+	+/-	0	0	0	0	+	+	0	0	0	0	?	?	?	+	0	+	+/-	0	0	+
3 To improve physical and mental health and wellbeing for all and reduce health inequalities	+	+	+	+	0	0	0	0	+	+	+	+	+	0	0	+	+	+	+/-	+	+	+	+	0
4 To ensure housing provision meets local needs	+	++	++	++	+/-	+/-	0	+	0	0	++	++	++	+	+	+	+	+	+	+	++	++	++	0
5 To improve sustainable access to jobs, basic goods, services and amenities for all groups	+	+	+	+	0	0	0	0	+	+	0	0	0	0	++	?	?	+	+	?	+	+	+	0
6 To reduce poverty and social exclusion	+	+	+	+	+	+	0	0	+	+	0	0	0	0	+	+	+	+	0	+	+	+	+	0

SA Objectives	LLDC Local Plan Sub Areas and Site Allocations																							
	Sub Areas				Site allocations																			
	1	2	3	4	Sweetwater	East wick and iCity	Neighbourhood centre	Chapman Road	Fish Island South	Fish Island North	Chobham Farm	East Village	Chobham Manor	Stratford Town Centre Extension	Chobham Farm South	Stratford Waterfront East	Stratford Waterfront West	Greater Carpenter District	Bridgewater Road	Rick Roberts Way	Bromley-by-Bow	Pudding Mill	Sugar House Lane	Three Mills
whilst promoting social inclusiveness and equality																								
7 To encourage sustainable economic growth, inclusion and business development	+	+	+	+	+	+	+	0	+	+	0	0	0	+	0	+	0	+	0	0	+	++	+	0
8 To increase employment opportunities for all residents in the local area	+	+	+	+	+	+	+	0	+	+	0	0	0	+	0	+	0	+	0	+	+	+	+	0
9 To protect and enhance biodiversity	+/-	+/-	+/-	+/-	0	0	0	0	+/-	+/-	0	0	0	+/-	0	+/-	+/-	0	+/-	+	0	0	+	0
10 To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	0	0	0	0	0	0	0	0	+/-	+/-	0	0	0	0	0	+	+	+	0	0	0	++	0	++
11 To protect and enhance the cultural heritage resource	0	0	0	?	0	0	0	0	+/-	+/-	0	0	0	0	0	0	0	0	0	0	0	0	0	++

SA Objectives	LLDC Local Plan Sub Areas and Site Allocations																							
	Sub Areas				Site allocations																			
	1	2	3	4	Sweetwater	East wick and iCity	Neighbourhood centre	Chapman Road	Fish Island South	Fish Island North	Chobham Farm	East Village	Chobham Manor	Stratford Town Centre Extension	Chobham Farm South	Stratford Waterfront East	Stratford Waterfront West	Greater Carpenter District	Bridgewater Road	Rick Roberts Way	Bromley-by-Bow	Pudding Mill	Sugar House Lane	Three Mills
12 To protect and enhance the quality of water features and resources and reduce the risk of flooding	+/-	-	-	-	0	0	0	0	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	0
13 To limit and adapt to climate change	+/-	+/-	+/-	+/-	0	0	0	0	0	0	0	0	0	0	0	+/-	+/-	+/-	+/-	?	+/-	+/-	+/-	0
14 To protect and improve air quality	+/-	+/-	+/-	+/-	0	0	0	0	-	-	0	0	0	0	0	+/-	+/-	+/-	+/-	0	+/-	+/-	+/-	0
15 To ensure sustainable use of natural resources	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	+/-	+/-	0	+/-	+/-	+/-	+/-	+/-	0

4.5.1 Sustainability comments

All four Sub Areas will have a positive contribution to meeting housing demands with planned housing growth of approximately 20 000 new residential units within the plan period. Along with the allocation of land for residential use, there is a significant floorspace allocated for employment and office use which will result in direct benefits in relation to improved employment opportunities, economic inclusion, and business development. Sub Area 3 provides the greatest opportunities to achieve the SA objectives relating to reduction of poverty and economic growth with the promotion of education and research facilities and the provision of retail and office space.

Positive effects are also identified with regards to enhancement of biodiversity and remediation of contaminated land in Sub Area 3 and 4. Although the four Sub Areas are already well-served by public transport, further transport infrastructure improvements will have a positive direct effect on access and connectivity across the LLDC area. Crime levels may increase with the influx of significant number of new residents in the short term; however the potential negative effects are likely to be reduced in the long term as increased employment opportunities will lead to improved living standard, with a positive effect on deprivation rates and reduction of crime.

The Sub Areas will also slightly improve overall levels of deprivation though providing new affordable decent housing, new essential facilities which are accessible via walking / cycling and the provision of some commercial / employment opportunities. The Olympic Stadium located in Sub Area 3 will provide a wide range of facilities which may encourage more sport activities thus reducing health inequalities. Further infrastructure improvements of roads, tube stations and bridges will improve the access of the expanding resident population to public transport. These opportunities will offer benefits to those from more deprived communities in the area. Townscape quality and local character will be protected through the implementation of policies relating to the height and density of new buildings and specific heritage-led regeneration policies.

Twenty site allocations were identified in the Local Plan and assessed against the SA objectives. On the whole, the majority of site allocations performed very well against housing and health objectives through the provision of a significant number of new homes and facilities to encourage healthy lifestyles. Positive effects are identified with regards to improvement of educational attainment in five site allocations through the provision of secondary school, library, and the conservation of existing heritage assets. At present there is uncertainty whether the potential to develop Chobham Farm South, Stratford Waterfront East, and Stratford Waterfront West with regards to education and research will be realised. Sustainable access and connectivity will be improved at half of the proposed sites which may result in further investment and economic benefits in these locations. However, there is limited information provided with regards to access issues and improvements for the rest of the sites with some uncertain/unknown potential effects against the SA objectives. Positive effects with regards to business and employment opportunities are identified at ten site allocations through the provision of employment/office/retail floorspace, new hotel, and a new District Centre.

Negative effects are primarily related with the close proximity of some sites in Sub Area 3 to water courses, with potential risks for flooding.

4.5.2 Recommendations and Mitigation Potential

It is recommended that the Sub Areas are amended to ensure the following:

- Increased energy demand from new developments may result in adverse effects caused by increase of greenhouse emissions. Achieving high levels (5 or 6) of the Code for

Sustainable Homes would serve to minimise any increase in carbon emissions associated with new development.

- Sustainable Drainage Systems (SuDS) to be incorporated into new development which can cope with future climate change issues.
- Although the LLDC area is considered to be very urban with few areas that provide valuable spaces for wildlife, the wetlands and rivers that cross the area provide habitat for species and where expanding neighbourhoods result in loss of habitat from landtake compensation measures should be sought.
- The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. Reuse/recycle of materials must be sought where possible. Opportunities should be sought to reuse any vacant dwellings.

Additional information or reference to the relevant policy in the plan would provide more clarity on how the Sub Area / Site Allocation will contribute to the achievement of the SA objectives.

4.6 Delivery and Implementation

These policies relate to enforcement issues and how enforcement will be undertaken by the Legacy Corporation. They are, therefore, more procedural and enforcement has to be undertaken in line with prevailing legislation and guidance. For this reason they have not been formally assessed through the SA process.

4.7 Cumulative Effects

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

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

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

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

- Increase in use of resources from water and energy consumption.
- Loss of habitats through landtake.
- Increase in landfill waste.

- Increase in road traffic in major roads and worsening of air quality from traffic generation and dust from construction activities.

5 MONITORING FRAMEWORK

5.1 Introduction

This section provides an outline monitoring framework and advice for monitoring the significant effects of implementing the Local Plan. Monitoring is an ongoing process integral to the implementation of the Local Plan, and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

5.2 Approach

The monitoring framework has been developed to measure the performance of the Local Plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives and indicators that were developed for the SA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The monitoring framework has been designed to focus mainly on significant sustainability effects including those:

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

There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore be important.

5.3 Proposed Monitoring Framework

Table 5-1 provides a framework for monitoring the effects of the LLDC Local Plan and determining whether the predicted sustainability effects are realised. The framework is structured using the SA Objectives and includes the following elements:

- The potentially significant impact that needs to be monitored or the area of uncertainty
- A suitable monitoring indicator

The impacts predicted in the SA will not be realised until development occurs through the LLDC Local Plan and other related planning documents (e.g. the Core Strategy and the Land Allocations DPD of each Local authority in the LLDC area). The monitoring framework presented in Table 5-1 can then be updated to include targets as and when they are developed.

Table 5-1 Monitoring Framework

Sustainability Objective	Significant Effect	Sustainable Development Indicator
To reduce crime, disorder and fear of crime	Increased crime rates due to increase of population in the short term.	Number of thefts/ crimes in the area per year.
To improve levels of educational attainment for all age groups and all sectors of society	Improved skills among working age residents.	Number and types of training programmes completed and jobs created. Qualifications of working age residents.
To improve physical and mental health and wellbeing for all and reduce health inequalities		Increase in community perception of being in "good health" from 2011 Census.
To ensure housing provision meets local needs	Increased housing development.	Number/percentage increase in new housing developments completed. Number of new build affordable dwellings completed as a percentage of total housing completions. Percentage of new homes built to Lifetime Homes standards.
To improve sustainable access to jobs, basic goods, services and amenities for all groups	Improved access to services and amenities Improved public transport and increased walking and cycling.	Index of multiple deprivation. Level and types of planning obligations relating to facilities provision received. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre. Percentage of completed retail, office and leisure development in town centres. Number of new housing and business developments incorporating Green Travel Plans. Mode for journey to work. Number of passengers using rail and underground stations.
To reduce poverty and social exclusion whilst	Reduced social exclusion and inequalities deprivation, including	General Index of multiple

Sustainability Objective	Significant Effect	Sustainable Development Indicator
promoting social inclusiveness and equality	access to services and amenities.	deprivation. Overall satisfaction with local area.
To encourage sustainable economic growth, inclusion and business development	Increased investment in the LLDC area.	Increase in number of VAT registered businesses. Reduction in unemployment rates. Amount of land developed for employment by type.
To increase employment opportunities for all residents in the local area	Increased investment in the LLDC area.	Increase in number of VAT registered businesses. Reduction in unemployment rates. Amount of land developed for employment by type.
To protect and enhance biodiversity	Improvement in quality and provision of open spaces.	Amount of land provided as green infrastructure.
	Increased pressure on open spaces, biodiversity and habitats.	Change in extent (hectares) of priority habitats and species (number). Meeting BAP targets.
To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	Improved townscape and public realm.	Area of townscape considered of low quality. Percentage of residents who are satisfied with their neighbourhood. Percentage of eligible open spaces managed to green flag award standard. Percentage of people living within 200m of open space.
To protect and enhance the cultural heritage resource	Increased number of listing buildings 'at risk'. Potential impact on setting of listed buildings and Conservation Areas.	Number of heritage assets 'at risk'.

Sustainability Objective	Significant Effect	Sustainable Development Indicator
To protect and enhance the quality of water features and resources and reduce the risk of flooding	<p>Increased water use.</p> <p>Deterioration of the ecological and chemical quality of watercourses.</p>	<p>Number of new developments utilising SuDS and water re-use to minimise water consumption.</p> <p>Number of developments meeting Code for Sustainable Homes Level 5 or 6 Standards.</p> <p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</p> <p>Water and Groundwater quality (EA)</p>
To limit and adapt to climate change	Increased resource use, waste generation and CO2 emissions	<p>Number of new developments with Code for Sustainable Homes level 5 or 6 and BREEAM 'excellent' rating.</p> <p>Number of properties within flood zones.</p> <p>Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</p> <p>New housing developments incorporating SuDS.</p> <p>Renewable energy capacity installed by type.</p>
To protect and improve air quality	Reduced air quality.	<p>Exceedances of statutory targets.</p> <p>Number of AMQAs.</p>
To ensure sustainable use of natural resources	Increased resource use and waste generation.	<p>Percentage of housing on previously developed land.</p> <p>Number of used vacant buildings.</p> <p>Proportion of waste sent to landfill.</p>

6 NEXT STEPS

6.1 Next Stages in the SA Process

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

6.2 How to Comment

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

London Legacy Development Corporation

Level 10, 1 Stratford Place

Montfichet Road

Olympic Park

London

E20 1EJ

Alternatively they can be viewed at LLDC's Planning website:

planningpolicy@londonlegacy.co.uk

Appendix A

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

Appendix B



Baseline Data

Vision and Objectives Options Appraisal

Alternative Options Policies and Sub Areas

Policy Options Sustainability Appraisal

Sustainability Appraisal Matrices Policies

Sustainability Appraisal Matrices Sub Areas and Site Allocations