



Local Plan Review

Integrated Impact Assessment

Proposed Submission

November 2017

Local Plan Review Integrated Impact Assessment (IIA) Addendum – February 2018

Following representations made during Regulation 19 consultation and ensuing minor modifications to the plan, the following amendments to the Proposed Submission version (dated November 2017) of the Integrated Impact Assessment prepared to accompany Local Plan Review are noted.

Habitat Regulations Assessment (HRA)

In light of recently revised Natural England advice following the 2017 Wealden judgement¹ relevant to the handling of the assessment of 'in combination' effects within the HRA process, an HRA Screening Assessment has been prepared (as Appendix 6) which looks at the potential for in-combination and cumulative effects the plan may have on nearest European sites, specifically the Epping Forest SAC and Lee Valley SPA/ Ramsar sites. This supersedes commentary in the main document on sites and policies relating to SAC impacts. Given evolving information on impact and discussions concerning a proposed Strategic Solution, plus ongoing advice about how to best translate the updated advice in practice, this document may see further updates/refinement. An addendum to Natural England's representation confirms this ongoing positive dialogue.

Proposed Minor Amendments to Thematic Policies

As factual amendments, and improvements to clarity and consistency, or embedded in further evidence base review including feedback from statutory consultees responsible for the historic and natural environment, the proposed minor amendments to thematic policies that form part of the Submission Local Plan are considered to have neutral (as they are inconsequential) or positive (as they enhance policy efficacy) effects on IIA objectives when inserted within the existing comprehensive plan-framework which adequately accounts for mitigation where appropriate.

Strategic Site S18 (Limmo) and S12 Canning Town Riverside: proposed minor amendments

Following representations from TfL regarding their landholdings, the boundary of the Limmo peninsular strategic site (S18) is proposed to be amended to include land south of the Lower Lea crossing, and the boundary of the Canning Town Riverside (S12) site is proposed to be amended to include land south of the A13. The changes enhance connectivity to and along the river (supporting delivery of the Lea River Park vision) and expand options for masterplanning of for instance, the configuration of open space and enhanced access to nature, and reduction of the barrier effects of these two major road crossings. In S18, the land in question is a designated SINC (Site of Importance for Nature Conservation), however plan policies SC4 and INF6

¹ <http://www.landmarkchambers.co.uk/news.aspx?id=4798>

make clear that the functional integrity of such sites is protected (requiring adverse impacts to be avoided or mitigated) Given the likely positive effects of the allocation in relation to other IIA objectives notably accessibility and place-making and the potential for enhancement of the SINC (given SC4's promotion of biodiversity) that inclusion provides, the change is considered acceptable in IIA terms.

Contents

Introduction	3
A1 Identifying Relevant Policies, Plans & Programmes	7
A2 Collecting Baseline Information	8
A3 Identifying Local Sustainability Issues	12
A4 Developing the IIA Framework.....	15
A5 Consulting on the Scope of the IIA	22
Stage B-D Developing/refining options & consultation	24
Next Steps	31
Appendix 1 PPP Review.....	32
Appendix 2 Scoping Responses	67
Appendix 3 Thematic IIAs.....	75
Appendix 4 Sites IIAs.....	104
Appendix 5 Equalities Impact Assessment.....	378
Appendix 6 Habitat Regulations Assessment.....	421

Introduction

What is the Local Plan Review?

- 1.1 Newham's Local Plan currently comprises the Core Strategy (2012), Detailed Sites & Policies DPD (2016), Joint Waste Plan (2012) and Gypsy & Traveller Accommodation DPD (2017).
- 1.2 Given current expectations for a consolidated Local Plan¹, the review will combine the Core Strategy and DSPDPD into a single document. The review provides an opportunity to update policies where necessary and update or add to site allocations/designations where their status has moved on since the drafting of the Core Strategy.
- 1.3 The review will not be a complete overhaul of the Local Plan as many elements are still working well and in large part the Council's vision for the Borough (including strategic objectives such as Resilience and Convergence) has not changed so much that an entirely revised Local Plan is required. Many of the impacts of the plan that this IIA will seek to assess have therefore already been considered under previous SA and IIA processes and found to be positive; the IIA will however seek to provide a full appraisal of the new consolidated Local Plan. For the expected timeline of production for the revised Local Plan please refer to the Council's published Local Development Scheme and Local Plan webpage.

What is an Integrated Impact Assessment?

- 1.4 An Integrated Impact Assessment (IIA) fulfils statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes subject to preparation or adoption by a local, regional, or national authority. The IIA approach incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations. An IIA also fulfils requirements for Health Impact Assessment, Equalities Impact Assessment, and Habitats Regulations Assessment. The integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work, particularly as the various types of impact assessment deal with many of the same issues.
- 1.5 Based on the 2005 ODPM document A Practical Guide to the Strategic Environmental Assessment Directive, the main stages of impact assessment are:
 - A) Set the context and objectives; establish baseline and decide scope
 - B) Develop / refine options and assess effects
 - C) Prepare the (IIA) report
 - D) Consult on the draft plan and IIA
 - E) Monitor effects of the plan

¹ http://planningguidance.communities.gov.uk/blog/guidance/local-plans/preparing-a-local-plan/#paragraph_012

The IIA Process

The move towards Integrated Impact Assessment

- 2.1 The IIA approach incorporates a number of assessments of the social, environmental and economic impacts of planning policies, incorporating: the statutory requirements of Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Habitats Regulation Assessment (HRA). The IIA addresses all of the Council's legal duties to carry out impact assessments of a plan within one integrated process. Integrating the assessments in this way ensures a comprehensive approach that informs the development of plan policies. As many of the issues considered in the assessments overlap in practice, an integrated approach is thought to produce better recommendations and outcomes. The IIA is an iterative process that considers the impacts of emerging policies and proposes alterations to them or mitigation for any adverse impacts that may be identified.

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 2.2 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan. When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.
- 2.3 Sustainability Appraisals should be carried out in accordance with Government Guidance 'A Practical Guide to the SEA Directive, ODPM, 2005' and the 'National Planning Policy Framework (NPPF) 2012' and Planning Practice Guidance (PPG). Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

Health Impact Assessment (HIA)

- 2.4 Health Impact Assessment (HIA) is a systematic approach to predicting the magnitude and significance of the potential health and wellbeing impacts, both positive and negative, of new plans and projects. The approach ensures decision making at all levels considers the potential impacts of decisions on health and health inequalities. HIA is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore looks at how health and social inequalities might be reduced or widened by a proposed plan or project.
- 2.5 While HIA is not a statutory requirement of the Local Plan preparation process, the physical environment is shaped by planning decisions which can facilitate or deter a healthy lifestyle, affect the quality and safety of the environment, encourage or discourage employment and training opportunities, enhance or impair social networks and nurture or

neglect opportunities for a rich community life. An HIA identifies actions that can enhance positive effects on health, reduce or eliminate negative effects, and reduce health and social inequalities that may arise through planning decisions. It considers how and to what extent proposed policies are likely to affect the health of people in Islington and recommends changes to improve outcomes.

Equalities Impact Assessment (EqIA)

- 2.6 An Equalities Impact Assessment (EQIA) is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. This Act places a general duty on the council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. EQIA is therefore an essential tool for demonstrating the Council has complied with the law by shaping the way decisions are taken and thereby improving outcomes. It enables a good understanding of needs and differential impacts that our policies may have on different groups. An EqIA response / checklist is included at **Appendix 5**.

Habitats Regulations Assessment (HRA)

- 2.7 Habitats Regulations Assessment (HRA) to meet Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive') is required in relation to development plans. The Directive seeks to provide legal protection of habitats and species that are of European significance. Specifically, it establishes a network of sites throughout the European Union known as *Natura 2000*. The Directive requires that any plan or project not directly connected with or necessary to the management of a designated habitats site, but likely to have a significant effect thereon, either individually or in combination with other plans or projects, is to be subject to a Habitats Regulations Assessment (HRA) of its implications for the site in view of the site's conservation objectives. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. In October 2005 the European Court of Justice ruled that this requirement extended to land use plans and is now set out in the *Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 1994* (as amended 2007).
- 2.8 As per the methodology of the Core Strategy HRA it is concluded that no pathways of impact leading to likely significant effects on any European sites would be created through the additional policy options or additional site allocations within the Borough. The nearest Natura 2000 site is Epping Forest SAC.

Assessment Stages

- 2.9 The stages required for an effective IIA process are set out in the table below along with the associated stage of plan preparation. The tasks are taken from the 2005 ODPM guidance previously referenced and are consistent with those undertaken for the Core Strategy and DSPDPD sustainability appraisals. Note that stage A is completed via this Scoping Report with tasks A1 to A5 represented in the structure of this document.

Required stages for effective IIA	Work stage / output
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>A1: Identifying other relevant policies, plans and programmes</p> <p>A2: Collecting baseline information</p> <p>A3: Identifying sustainability issues and problems</p> <p>A4: Developing the IIA framework</p> <p>A5: Consulting on the scope of the IIA</p>	<p>Pre-production / Evidence Gathering IIA Scoping report</p>
<p>Stage B: Developing and refining options and assessing effects</p> <p>B1: Testing the DPD objectives against the SA framework</p> <p>B2: Developing the DPD options</p> <p>B3: Predicting the effects of the DPD</p> <p>B4: Evaluating the effects of the DPD</p> <p>B5: Considering the ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: Proposing measures to monitor the significant effects of implementing the DPD</p>	<p>Local Plan Production IIA Production</p>
<p>Stage C: Preparing the Sustainability Report</p> <p>C1: Preparing the SA Report</p>	<p>IIA Report</p>
<p>Stage D: Consulting on the draft SPD and SA Report</p> <p>D1: Public participation on the options of the DPD and the IIA report</p> <p>D2: Assessing significant changes</p> <p>D3: Making decisions and providing information</p>	<p>Local Plan / IIA Consultation & Examination</p>
<p>Stage E: Monitoring the significant effects of implementing the DPD</p> <p>E1: Finalising the aims and methods for monitoring</p> <p>E2: Responding to adverse effects</p>	<p>Local Plan Adoption and monitoring IIA Report (Adoption)</p>

A1 Identifying Relevant Policies, Plans & Programmes

- 3.1 This section establishes the plans, programmes or strategies relevant to the preparation of a Local Plan and the IIA process. It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Newham.
- 3.2 The policy framework is constantly evolving: at a national level, the National Planning Policy Framework and Guidance are now in place (replacing and simplifying swathes of former national policy and guidance documents); at a regional level, the London Plan and associated Supplementary Planning Guidance are subject to on-going review – a 'direction of travel' document for London Plan review has for example recently been published by the Mayor of London. At a sub-regional level, planning decisions in Newham are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as more studies, corporate surveys, and Authority Monitoring reports are produced. Two key strategies important to highlight are the Mayor of Newham's Resilience Agenda and the Convergence Strategy of the 'Growth Boroughs' (with its stated aim that within 20 years of the 2012 Games, the host communities should have the same social and economic chances as other London boroughs).
- 3.3 Due to its length, a table listing the documents considered relevant is included at Appendix 1 – comments are welcomed with regard to whether any key policies, plans and programmes are missing or whether updated versions are available but not cited. Note that nothing above EU level is listed.

A2 Collecting Baseline Information

- 4.1 Task A2 establishes the baseline conditions in Newham that are relevant to the Local Plan and its associated IIA. The undertaking of Local Plan review follows the development of the Core Strategy (2012) and the DSPDPD (2016), as such the data capture and analysis derived from the preparation of those two documents' evidence base provides a starting point for the consideration of issues and information relevant to an updated Local Plan
- 4.2 The baseline is however constantly evolving; for example, the regeneration of Newham, changing economic conditions and improved data capture and analysis mean that the ongoing analysis of statistics and information is necessary as the Local Plan is progressed. The Authority Monitoring Report (AMR) is updated via annual topic-based bulletins to provide the most up-to-date baseline picture of Newham across the broad themes of the Core Strategy and DSPDPD. The AMR bulletins look at a range of economic, social and environmental data, and include analysis, more information can be found at: <http://www.newham.gov.uk/Pages/Services/Local-plan.aspx>
- 4.3 It is worth noting that the creation of the London Legacy Development Corporation (LLDC) has removed a portion of land around Stratford from the remit of the London Borough of Newham as Local Planning Authority. All decisions made within the LLDC area will be subject to their own Local Plan, more information on which can be found at: <http://queenelizabetholympicpark.co.uk/planning-authority>

Borough Portrait

- 4.4 In addition to the summary picture given here, the www.newham.info website provides a range of data about the Borough (including the July 2016 version of their 'Key Facts' document), further information on Equalities groups can also be found in the published [Equalities and the LDF \(2011\)](#).
- i) Newham has historically been one of the most disadvantaged boroughs in London. Since the steady decline of the docks beginning in the 1960s it has suffered from high unemployment and a high turnover in population, changing from a primarily white working class area in the 1980s and 1990s to the area with the highest concentration of Black and Minority Ethnic (BME) groups in the country, making up over 73% of the population in 2014 – a significant increase from 61% in 2001 (GLA 2013, Round Ethnic Group Projections). Forty-one per cent of the population over three years-old do not have English as their main language (Census, 2011). Within the population, Indian is the largest group with a 14% share, followed by Bangladeshi (13%), Black African (12%) and Pakistani (10%) (GLA 2012, Round Ethnic Group Projections).
- ii) The overall population of London grew from the 1990s, but Newham's grew at an even faster rate than average, rising from 216,300 in 1991 to 323,400 in 2013 (GLA 2013, Demographic Projections). This growth partially helps explain why Newham has the highest average household size in London (three in 2011, compared with just over two nationally,

and two and a half in London) (Census, 2011), and the steep rise in population density, from 69 in 2001 to 89 in 2011 people per hectare (GLA 2013, Demographic Projections). This is still far below the density of crowded inner boroughs like Islington, Camden or Kensington and Chelsea, or neighbouring boroughs such as Hackney or Tower Hamlets.

- iii) Newham has had historically high unemployment – more than double the national average in 1991 (Census, 1991). Thirty-one per cent of children lived in out-of-work families in 2012, compared with 19% across England (GLA 2013, Tax Credits), and the Income Support claimant rate was higher than in London or England in 2013 (GLA 2014, Income Support Claimants). Although official unemployment has fallen faster than the London and national average (from 13.1% in 2010-10% in 2015) and the rate of employment is now comparable with the national average, median pay is significantly lower, at only three quarters of the national average (NHPS, July 2016). There is a significant gender gap in employment levels, with working-age women more likely to define themselves as unemployed compared to working-age men (13% compared to four per cent – NHPS, July 2016). Nearly a quarter of working age residents (23%) have not worked in the last 12 months (NHPS, 2014). Underemployment is also an issue in Newham, particularly among part-time workers, one-third (33%) of whom would like to work longer hours at their current rate of pay (NHPS, 2016). The number of part-time jobs rose from 23,000 in 2009 to 28,300 in 2012 (NOMIS). Since 2007 Workplace, Newham’s job brokerage service, has helped over 20,300 residents into work. Half of the residents helped into work by Workplace are long-term unemployed (Newham Workplace, 2014).
- iv) Household incomes in Newham remain significantly below the national average. The median net equivalised household income before housing costs in Newham equates to £358 per week compared to the national level of £453 per week (NHPS 2016). This is exacerbated further by high housing costs meaning that median net equivalised household income *after* housing equates to £278 per week compared to £386 nationally (NHPS 2016).
- v) Housing is a dominant problem in Newham, and across London, but the level of poverty and low income in Newham make pressures on the poorest particularly acute. The share of owner occupiers has fallen (43% in 2001; 28% in 2012) along with the share of social housing tenants (37% in 2001; 34% in 2012). But there has been a steep rise in private renting, more than doubling since 2001 from 17% to 37%. In 2012 there were 16,600 more private rented properties than in 2001, and the figure is rising. Private rents have also risen and private tenants have seen incomes after housing costs fall since 2009 (NHPS, 2014). The proportion of owner occupiers (29%) is far below the London average of 50%, and less than half the national average (64%). Meanwhile house prices, remain far below the London average (£236,000 compared with £404,000).
- vi) Newham’s educational gains are the most striking achievement of the last decade. London schools have improved their GCSE attainment with five A*-C grades including English and Maths at a faster rate than the national average. Newham has accelerated its improvements since 2008, overtook England in 2011 and 2012, is rapidly catching up with London as a whole, and does well on measures of value-added (DoE, 2014). However, 42 per cent of residents have no formal qualifications. This compares to just nine per cent of people living in London and 13 per cent in the UK, and represents an increase on 2013 levels (when it was 35%). At the same time, just a quarter of Newham residents (25%) have

a Higher Education qualification, compared with almost half of Londoners (46%) and over a third of people in the UK (36%) (NHPS 2016).

- vii) Newham is growing and its demographic make-up, its economy and its educational attainment are changing. It is the poorest London borough through a combination of:
- low-paid, low-skilled work with one-fifth earning less than the minimum wage;
 - a fast growing, highly insecure and often poor quality private rented market with renters' income levels falling as a share of the national median (NHPS, 2014);
 - a high level of benefit dependency, both among those in work and those not working.
- viii) Just over half (56%) of Newham residents receive some benefits (NHPS, 2016). Fifty-one per cent of children in Newham live in households in poverty before housing costs (this rises to two-thirds when housing is considered). Comparing this to national figures (which find that 17% of children live in poverty) suggests that children in Newham are three times more likely to live in poverty (NHPS 2016).
- ix) Absolute poverty levels have fallen since 2013, almost two-in-five households in Newham (37%) are in absolute poverty before housing costs, compared to 44% in 2013. But, again poverty levels still far exceed the national incidence of 17% (NHPS 2016). One in five households suffer fuel poverty (18%) (NHPS, 2016). One in eight (12%) are at least two months behind with their rent or mortgage. Only one in eight residents (11%) say they are "comfortable"; a quarter of all residents (26%) are struggling to manage financially; and a third (32%) are just "getting by".
- x) There are four Grade 1 and six Grade2* Listed Buildings in the Borough; eleven Listed Buildings (incorporating all grades) on Historic England's Heritage at Risk Register; and an additional 192 entries on the Local List. The nature of the built environment including architectural styles; heritage assets; and strengths, weaknesses, opportunities, and threats in each part of the Borough are explored further in the Character Study (first published 2011 and updated 2017).

Table 2: Key sources of baseline information

- Understanding Newham 2015 – Ipsos MORI findings from Wave 8 of the Newham Household Panel Surveys (NHPS, July 2016)
- Gypsy & Traveller Accommodation Assessment (March 2016)
- Core Strategy and supporting documents including Statement of Consultation (2012)
- Authority Monitoring Reports (updated via annual bulletins)
- Newham's Biodiversity Resource
- Newham Biodiversity Action Plan
- Employment Land Review
- LBN Strategic Flood Risk Assessment 2017 + [Environment Agency Flood Zone Maps](#)
- Food Outlet Mapping in the London Borough of Newham

Table 2: Key sources of baseline information

- Newham Strategic Housing Market Assessment
- Newham Affordable Housing Economic Viability Assessment
- Community Infrastructure Study
- Town Centre and Retail Study
- Newham Character Study
- Air Quality Action Plan
- Economic Development Strategy
- Housing Newham Strategy
- Joint Strategic Needs Assessment (NHS Newham and Newham Council)
- Local Implementation Plan
- Sustainable Community Strategy
- Greater London Archaeological Advisory Service (GLAAS) *London Borough of Newham - Archaeological Priority Areas Appraisal* (July 2014)

A3 Identifying Local Sustainability Issues

- 5.1 Task A3 looks at the sustainability issues most affected by development in Newham which the Local Plan and IIA should respond to. These have been identified through monitoring, engagement with stakeholders, and development of the Local Plan evidence base.
- 5.2 The sustainability issues are set out in the structure of the five existing Local Plan themes in recognition that the thematic structure of the plan is likely to stay largely the same. Setting the sustainability issues out in this way will allow for easy reading of the IIA alongside the draft plan.
- 5.3 The Local Plan will include spatial policies (including allocation of sites) and detailed policies for the purposes of development management. As the document advances, further and more detailed sustainability issues will be identified; as such, the IIA accompanying the Issues and Options and Proposed Submission stages of the Local Plan may include assessment of policies that seeks to address sustainability issues not yet identified here, as issues emerge throughout the plan-making period.
- 5.4 The broad sustainability issues identified are set out in Table 3.

Table 3: Sustainability issues and problems	
Successful Places	
<p>Sustainability issues and problems:</p> <ul style="list-style-type: none"> • Improving the quality of the built environment. • Improving the health of Newham residents by promoting healthy lifestyles. • Maintaining local distinctiveness and protecting and enhancing place-making assets including the historic environment and social / cultural assets • Improving town and local centres. • Improving movement corridors and linear gateways. 	<p>Key sources:</p> <ul style="list-style-type: none"> • Authority Monitoring Report Bulletins • Newham Character Study • Food Outlet Mapping in the London Borough of Newham • Town Centre and Retail Study • Core Strategy Consultation Statement
Jobs, business and skills	
<p>Sustainability issues and problems:</p> <ul style="list-style-type: none"> • Improving the borough’s economy through regeneration. • Improving land use efficiency through 	<p>Key sources:</p> <ul style="list-style-type: none"> • Authority Monitoring Report Bulletins • Employment Land Review

Table 3: Sustainability issues and problems	
<p>managed release of surplus employment land.</p> <ul style="list-style-type: none"> Improving the educational attainment, skills and aspirations of Newham’s residents 	<ul style="list-style-type: none"> Economic Development Strategy Core Strategy Consultation Statement
Homes	
<p>Sustainability issues and problems:</p> <ul style="list-style-type: none"> Providing the right mix and balance of housing types, sizes and tenures. Providing affordable housing. Providing accommodation for those with specialist need. Improving existing housing stock. 	<p>Key sources:</p> <ul style="list-style-type: none"> Authority Monitoring Report Bulletins Newham Strategic Housing Market Assessment Newham Affordable Housing Economic Viability Assessment Equalities and the LDF Core Strategy Consultation Statement
Sustainability and climate change	
<p>Sustainability issues and problems:</p> <ul style="list-style-type: none"> Mitigating and adapting to climate change. Ensuring high standards of sustainable design are achieved in the built environment. Improving resource efficiency in the built environment (including energy, waste, water). Improving resilience to flood risk. Protecting, enhancing and creating habitats for biodiversity. 	<p>Key sources:</p> <ul style="list-style-type: none"> Authority Monitoring Report Bulletins Newham’s Biodiversity Resource: Evidence Base for the LDF Newham Biodiversity Action Plan Strategic Flood Risk Assessment Equalities and the LDF Core Strategy Consultation Statement
Infrastructure	
<p>Sustainability issues and problems:</p> <ul style="list-style-type: none"> Improving the transport network. Improving recycling and the management of waste. Providing opportunities for heat and power networks. Address existing open space deficiencies and improving existing open spaces. 	<p>Key sources:</p> <ul style="list-style-type: none"> Authority Monitoring Report Bulletins Community Infrastructure Study Local Implementation Plan Equalities and the LDF Core Strategy Consultation Statement

Table 3: Sustainability issues and problems

- | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <ul style="list-style-type: none">• Improve existing waterways and riparian environments• Providing adequate community facilities and infrastructure.• Promoting local access whilst managing impacts | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

A4 Developing the IIA Framework

- 6.1 Task A4 sets out the IIA objectives; these have evolved through SA/SEA previously undertaken for the Local Plan but have been updated in line with recent changes to corporate strategy and other contextual changes (such as changes in development plan terminology). The Core Strategy SA scoping report proposed 18 sustainability objectives that were refined following statutory and stakeholder engagement. This IIA scoping report consolidates and updates those objectives for the purposes of Local Plan review resulting in 3 overarching, cross-cutting outcome-oriented objectives, 3 core spatial outcome objectives, and 7 more traditional 'impact' objectives. Inevitably however, all overlap to some extent.
- 6.2 The 13 objectives set out below reflect the move towards integration of impact assessments; objectives and associated prompt questions can be linked to Habitats Regulations Assessment (objective 12), Equalities Impact Assessment (particularly but not exclusively objectives 1, 3, 6) and Health Impact Assessment (particularly objective 2).
- 6.3 Each of the objectives has been linked to the monitoring framework set out for the Core Strategy, which established a comprehensive set of indicators to be examined through the Authority Monitoring Report Bulletins. Whilst indicators may be subject to some updates based on availability of information and resources today, the framework of indicators is expected to be largely similar. As the Local Plan is progressed, the IIA will appraise policy options and site allocations against these objectives.
- 6.4 The framework of objectives is set out in Table 4 below; for the purposes of the IIA, the decisions being appraised will be in the site allocations and designations and formation of the development management policies within the revised Local Plan.

Table 4 - OBJECTIVES (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

Note: the monitoring indicator framework will be updates as part of the Local Plan Review

<p>1. To reduce poverty and promote equality of opportunity</p> <p>a) Will it reduce poverty in those areas and communities / equalities groups most affected (social and spatial convergence)?</p> <p>c) Will it improve access to low-cost transport and other facilities?</p> <p>d) Will it help tackle fuel poverty?</p> <p>e) Will it provide good quality education facilities, including life-long learning for all?</p> <p>f) Will it help promote access to employment opportunities for all local people?</p> <p>g) Will it promote economic, personal and community resilience (as per Newham’s Resilience Agenda)?</p> <p>h) Will it increase the numbers of higher paid jobs in the borough?</p> <p>i) Will it help to provide employment in the most deprived areas and stimulate regeneration?</p> <p>j) Will it help reduce overall unemployment, particularly long-term unemployment?</p> <p>k) Will it support healthier lifestyles for all?</p> <p>l) Will it provide for successful neighbourhoods for all?</p>	<p>J-OUT2</p> <p>i) Jobs, employment and activity Rates</p> <p>ii) Low earnings and deprivation (proxy)</p> <p>iii) Proportion of working age population qualified to level 2 or more</p>
<p>2. To support healthier lifestyles</p> <p>a) Will it facilitate an increase in physical activity including sports and active travel?</p> <p>b) Will it increase [relative] access to healthy food?</p> <p>c) Will it improve the quality of housing for all?</p> <p>d) Will it improve access to jobs for all and otherwise reduce poverty?</p> <p>e) Will it improve access to high quality health facilities and encourage provision in areas of need?</p> <p>f) Will it help improve mental and emotional health, reducing social exclusion?</p> <p>g) Will it help to reduce the number of people dying prematurely from preventable causes?</p> <p>h) Will it reduce exposure to poor air quality across all groups?</p>	<p>SP-OP2</p> <p>i) No of new takeaways permitted</p> <p>ii) Controlling environmental nuisance and health impacts</p> <p>SP-OUT2</p> <p>i) Mortality rate</p> <p>ii) Rates of physical activity, childhood obesity and mortality linked to circulatory diseases</p> <p>Plus relevant transport, open space etc. indicators</p>
<p>3. To create successful neighbourhoods</p> <p>a) Will it help to make people feel positive about the area they live in?</p> <p>b) Will it help reduce the number of vacant and derelict buildings?</p> <p>c) Will it help reduce disturbance from noise?</p> <p>d) Will it improve safety and security, and reduce crime, fear of crime and anti-social behaviour?</p> <p>e) Will it provide for a well maintained and inclusive public</p>	<p>SP-OUT1</p> <p>i) Crime and fear of crime</p> <p>ii) Environmental nuisance levels</p> <p>S-OUT1</p> <p>i) Levels of out-migration to other UK authorities</p> <p>ii) Satisfaction with the area</p>

Table 4 - OBJECTIVES (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

Note: the monitoring indicator framework will be updates as part of the Local Plan Review

<p>realm and other public facilities? f) Will it encourage an active and connected, strong and cohesive community (personal and community resilience)? g) Will it provide for access to the mix of housing, jobs and infrastructure people that meets local needs and provides for quality of life?</p>	
<p>4. To ensure people have access to a choice of good quality, well located housing that meets their needs</p>	<p>H-OUT1 a) Homeless Households in temporary accommodation b) Number of Households on the Local Authority waiting list</p> <p>H-OUT2 Housing quality (stock condition)</p> <p>H-OUT3 Housing affordability</p>
<p>a) Will it increase the supply of housing? b) Will it help people on moderate and lower incomes house themselves? c) Will it enable families to house themselves? d) Will it allow residents with specific needs to house themselves appropriately? e) Will it encourage development of an appropriate density, standard, size and mix? f) Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle, taking into consideration exposure to potential environmental hazards? g) Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?</p>	<p>J-OUT1 i) Businesses by sector ii) New business formation and Survival a) Rate of Business Formation per 10,000 b) 3 year business survival rate iii) Vacancy rates on Employment Land</p> <p>J-OUT2 i) Jobs, employment and activity Rates ii) Low earnings and deprivation (proxy) iii) Proportion of working age population qualified to level 2 or more</p> <p>SP-OUT4 i) Vacancy Levels and non-retail uses in primary frontages in town centres</p>
<p>5. To foster sustainable economic growth</p>	
<p>a) Will it encourage business start-ups and support the growth and continuing health of successful businesses, town and local centres in the area? d) Will it help to diversify the economy? e) Will it focus growth in locations with appropriate access and other facilities? g) Will it develop the workforce skills necessary to support and grow Newham's economy? e) Will it support the development of green industries? e) Will it encourage the transportation of freight by means other than road?</p>	

Table 4 - OBJECTIVES (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

Note: the monitoring indicator framework will be updates as part of the Local Plan Review

<p>6. To ensure inclusive access to a range of high-quality community facilities and open space</p> <p>a) Will it enable improved, inclusive access to a range of community facilities and open space? b) Will it enable deficiencies of access to community facilities and open space to be positively addressed? c) Will it improve the quality of community facilities and open space? d) Will it improve visibility of community facilities and perceived openness to all? e) Will it improve access to low-cost transport and other facilities, including those in other boroughs where appropriate? f) Will it help to sustain the provision of community facilities and open space that meets local needs?</p>	<p>INF-OUT5</p> <p>i) Distribution of key community facilities in the borough ii) Other data concerning infrastructure sufficiency (e.g. childcare sufficiency assessment)</p> <p>INF-OP8</p> <p>i) Net new community infrastructure floorspace in new and established neighbourhoods ii) Provision of multi-purpose community facilities</p> <p>INF-OUT4</p> <p>ii) Satisfaction with Parks (proxy)</p> <p>INF-OP6/7</p> <p>i) Open space losses and gains ii) Open space improvements iii) Blue ribbon improvements - to access etc</p>
<p>7. To promote resource-efficient development, design and construction</p> <p>a) Will it encourage the generation and use of renewable energy? b) Will it encourage energy efficiency? c) Will it reduce CO2 and other greenhouse gas emissions? d) Will it encourage the re-use of resources? e) Will it encourage sustainable construction methods and procurement? f) Will it encourage water efficiency and drought resilience? g) Will it help avoid overheating in the built environment? h) Will it encourage the reuse or improvement of buildings and land that are vacant, under utilised or in disrepair? c) Will it make the best use of scarce land resources?</p>	<p>SC-OP1/2: BREAAM and Code for Sustainable Homes Scores of major consents</p> <p>SC-OUT1</p> <p>i) Water consumption per capita ii) CO2 emissions (proxy for energy) iii) Environmental performance of housing stock</p> <p>H-OP1</p> <p>ii) Housing density</p> <p>J-OUT1</p> <p>iii) Vacancy rates on Employment Land</p> <p>See also waste indicators</p>
<p>8. To improve air and water quality</p> <p>a) Will it improve air quality? b) Will it reduce emissions of greenhouse gases? c) Will it help to reduce emissions of PM10 and NO2?</p>	<p>SC-OUT2</p> <p>ii) River water quality</p>

Table 4 - OBJECTIVES (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)

Note: the monitoring indicator framework will be updates as part of the Local Plan Review	
d) Will it reduce traffic volume and congestion? e) Will it improve the quality of waterbodies? f) Will it reduce discharges to surface and ground waters? g) Will it improve the water systems infrastructure (e.g. water supply and sewerage)?	SP-OUT2 iii) Air Quality Exceedences
9. To increase the proportion of journeys made by sustainable modes of transport	INF-OUT1 i) Modal shift
a) Will it encourage development at locations that enable walking, cycling and/or the use of public transport? b) Will it encourage the provision of infrastructure for walking, cycling and/or public transport? c) Will it encourage access for all to public transport? e) Will it make journeys by sustainable modes of transport easier, safer and more pleasant?	a) Walking mode share b) Cycling mode share cycling trips originating in borough ii) Traffic volume and congestion (proxy)
10. To minimise the production of waste across all sectors and promote the proximity principle.	INF-OUT2 ii) Transport related CO2 emissions
a) Does it encourage the reduction, reuse, and recycling of waste (in that order of priority)? b) Does it provide for the future demand for waste management infrastructure in-line with the above hierarchy and proximity principle? c) Does it promote and facilitate a circular economy? d) Does it maximise efficiencies for transporting waste?	INF-OUT3 i) Proportion of waste dealt with within the borough/ELWA area ii) Waste arising by management type Plus relevant resource-efficiency indicators
11. To minimise and reduce flood risk	Currently no relevant outcome indicators - though should include flood incidents (to be developed)
a) Will it promote the use of sustainable urban drainage systems? b) Does it take into account potential flood risk, minimising the risk of harm to people and property? c) Will it improve drainage without the worsening of flood risk in any location? d) Is the policy/allocation in line with the sequential test (steering development away from flood risk as far as possible)?	Proxy output indicators however are: SC-OP3 i) Planning permissions granted contrary to EA advice ii) Flood protection projects delivered as part of consents and otherwise
12. To enhance and protect existing habitats and biodiversity.	SC-OP4 ii) Changes in areas of biodiversity

Table 4 - OBJECTIVES (questions to consider in appraising a policy, site allocation or other spatial proposal/ possible key outcome indicators linked to the Core Strategy monitoring framework)	
Note: the monitoring indicator framework will be updates as part of the Local Plan Review	
a) Will it protect and enhance natural habitats in the borough, particularly those of priority species (includes terrestrial and aquatic)? b) Will it provide for the protection of biodiversity in the borough? c) Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs? d) Will it improve soil quality?	importance Plus more periodic species monitoring
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	SP-OP3 (ii) Building for Life 12 Assessments of schemes SP-OP5 iii) Protected trees lost SP-OUT3 Historic buildings and monuments at risk
a) Will it protect and enhance sites, features and areas of historical value? b) Will it conserve and enhance the significance of heritage assets and their settings? c) Will it conserve and enhance townscape character? d) Will it promote high quality design and sustainable Construction methods? e) Will it respect visual amenity and the spatial diversity of communities? f) Will it enhance the quality of the public realm? g) Will it improve the wider built environment and sense of place? h) Will it enable enhancement of the public realm and local distinctiveness?	

Compatibility of IIA objectives

6.5 The compatibility of the IIA objectives has been assessed to identify where potential conflicts may arise. Most of the objectives have a positive or neutral effect when tested against the other IIA objectives. The neutral outcomes occurred where there was no link between the two objectives or where both positive and neutral effects were possible. Some natural conflicts also emerged where two objectives were shown to be not compatible with each other. These generally occur where an objective that requires development (such as housing or employment provision) is tested against environmental objectives (such as biodiversity). Achieving sustainable development is inevitably a balancing act.

6.6 The compatibility of the IIA objectives is shown in Table 6.

Table 5: Compatibility of the IIA objectives												
Key												
✓ Objectives are compatible												
X Objectives are not compatible												
(blank) Objectives have neutral compatibility												
2	✓											
3	✓	✓										
4	✓	✓	✓									
5	✓	✓										
6	✓	✓	✓	✓	X							
7	✓	✓			✓							
8		✓	✓	✓	✓		✓					
9	✓	✓	✓	✓	✓	✓	✓	✓				
10					X		✓					
11		✓		X		✓	✓					
12		✓	X	X	X	X		✓		✓	✓	
13			✓		✓						✓	✓
	1	2	3	4	5	6	7	8	9	10	11	12

A5 Consulting on the Scope of the IIA

7.1 Task A5 requires consultation on the scope of the IIA. The Environmental Assessment of Plans and Programmes Regulations 2004 require that **English Heritage**, the **Environment Agency** and **Natural England** be consulted for a period of five weeks, the Scoping Report was also sent to **Public Health**, the relevant **Clinical Commissioning Group (CCG)** and the **London Enterprise Panel**. The consultation ran from Monday 31st October 2016 to Monday 5th December 2016, the report along with instructions on how to respond was sent to consultees by email and hosted at www.newham.gov.uk/planningconsultations.

Response to Scoping Consultation

7.2 Responses were received from the three statutory consultees, these are included in full at **Appendix 2** and summarised below.

Respondent	Comments	LPA Notes
Environment Agency	Reflect updated flood risk guidance / climate change allowances	Not relevant to this in-house IIA process, strategic flood risk is assessed by the SFRA which is currently being updated, necessary changes will be incorporated to the plan as per the Issues & Options identified. The plan will also make reference to following the latest EA / Gov advice for site-specific FRAs. The sequential test of sites is also completed through the SFRA, not this IIA.
	Incorporate the sequential approach	The sequential test is done as part of the SFRA not this IIA.
	Revise objective to remove 'minimise', leaving only 'reduce flooding'	The way the IIA objective has been handled demonstrates that 'using opportunities offered by new development to reduce the causes and impacts of flooding' is what is being responded to. Many sites will not be capable of reducing flooding from all sources (particularly tidal) therefore the proposed revision is considered unreasonable.
	Newer versions of WFD management cycle and Thames River Basin Management Plan	Will be updated in the PPP review and checked for impacts on IIA process. Latest versions will be referenced in the revised Local Plan where relevant.
Historic England	Borough portrait has little detail about qualitative characteristics	A wealth of information is provided in the Newham Character Study (identified in Table 2 above); the suggested facts re heritage assets have been added to the borough profile.

	Heritage should be a separate objective.	The LPA is of the view the IIA adequately fulfils its role in assessing impacts on heritage, the wording is sufficiently explicit so as to ensure heritage is not overlooked or disregarded: <i>To enhance character, protecting, conserving and enhancing heritage and other character assets.</i>
	Specifically ask 'will it conserve and enhance the significance of heritage assets and their settings'	This is done through the IIA, for example the assessment of individual site allocations. The wording has been added to the prompt questions above, though is similar to those already listed.
	Suggests there is compatibility between heritage objective and objectives 5 (foster sustainable economic growth) and 12 (habitats & biodiversity).	Noted and amended, specifically with regard to the potential local economy benefits of valued heritage assets.
	Updated Tall Building guidance, now Advice Note 4 (Dec 2015) plus other Good Practice Advice	References updated.
Natural England	Notes the following as relevant to the plan area: green infrastructure strategies, biodiversity plans, rights of way improvement plans, shoreline management plans, coastal access plans, river basin management plans, AONB and national park management plans, relevant landscape plans and strategies.	No specific implications for the IIA process have been indicated, therefore no changes made at this stage. The items described will be reviewed for impacts they may have on the plan itself.
	Advice about plan monitoring indicators.	Not relevant to the IIA process itself but rather to plan review and the plan's embedded monitoring framework. The LPA will investigate the feasibility of suggested indicators going forward.

Stages B to D: Developing & Refining Options / Consulting on the draft IIA

- 7.3 Stage B of the IIA process is commenced via the appraisal of options (for each thematic area and main site allocations) published as part of the ‘Issues and Options’ / Reg.18 consultation (February to April 2017). As such the ‘I&O stage IIA’ constituted the first iteration of stage C1 (preparation of the report), following this first consultation (and as policy options are refined) the IIAs were updated and are presented here in **Appendices 3 and 4**. For more detail regarding the refinement of policy and spatial allocations options (taking in to account the IIA as well as consultation feedback and further evidence, and explaining dropped and new sites) please refer to the associated **Options Appraisal** document.
- 7.4 Comments received in relation to the I&O draft IIA are summarised below along with associated commentary and resulting actions. Though these representations are not provided in full here (as relevant comments were primarily found within larger submissions), they can be provided by the LPA on request. While the IIAs attached to this document appraise the Proposed Submission policies and site allocations, the previous iteration will similarly remain available via the Council’s website.
- 7.5 **IIAs are grouped as follows:**

Appendix 3 - Thematic IIAs

(Refer to each section for details of the policies appraised)

- Successful Places
- Jobs, Business and Skills
- Homes
- Sustainability & Climate Change
- Strategic & Sustainable Transport
- Social Infrastructure

Appendix 4 - Site IIAs

New Strategic Sites – Individual IIAs:

Community Neighbourhood	Site Name
Royal Docks	S09 Silvertown Landing
Royal Docks	S07 Central Thameside West
Royal Docks	S20 Lyle Park West
Royal Docks	S23 Connaught Riverside (‘Thameside Middle’)
Royal Docks	S04 North Woolwich Gateway
Canning Town and Custom House	S12 Canning Town Riverside
Canning Town and Custom House	S06 Coolfin North
Beckton	S01 Beckton Riverside
Beckton	S02 Alpine Way
East Ham	S03 East Ham Western Gateway

Existing Strategic Sites – individual IIAs:

Community Neighbourhood	Site Name
Canning Town and Custom House	S11 Parcellforce
Canning Town and Custom House	S18 Limmo
Green Street	S27 Queens Market
Stratford and West Ham & Plaistow	S29 Plaistow North

Existing Strategic Sites – limited changes, collective IIA (see Core Strategy IIA for further information):

Community Neighbourhood	Site Name
Stratford and West Ham	S05 Stratford Central
Stratford and West Ham	S10 Abbey Mills
Royal Docks	S21 Silvertown Quays
Canning Town and Custom House	S08 Thames Wharf
Canning Town and Custom House	S13 Manor Road
Canning Town and Custom House	S14 Canning Town Central
Canning Town and Custom House	S15 Canning Town East
Canning Town and Custom House	S28 Custom House/Freemasons Road
Canning Town and Custom House	S30 Royal Victoria West
East Ham	S25 East Ham Market

New non-strategic sites – individual IIAs

Allocation typology	Site Name
Housing	HSG14 Hartington Close/ Vandome Rd
Housing	HSG22 Balaam Street Garage
Housing	HSG23 Balaam Leisure Centre
Housing	HSG32 Abbey House
Housing	HSG33 15-21 Leytonstone Road
Housing	HSG35 Rosebery Avenue
Housing	HSG36 Prince Regent Lane (Falcon Carriage)
Community Facility	CF06 Bow County Court
Community Facility	CF10 Royal Road
Community Facility	CF16 Tunmarsh Centre
Community Facility	CF18 NCFE Welfare Road
Community Facility	CF23 Former Rainbow Centre
Community Facility	CF24 Former Upton Centre / One Love Site
Community Facility	CF25 Manor Park Community Centre
Community Facility	CF26 Katherine Road Community Centre
Community Facility	CF27 Barking Road Centre
Community Facility	CF28 Newham Leisure Centre
Local Mixed Use Area	LMUA3 Nursery Lane
Local Mixed Use Area	LMUA8 Atherton Mews
Local Mixed Use Area	LMUA13 Bridge Road Depot
Local Mixed Use Area	LMUA14 Beeby Road
Local Mixed Use Area	LMUA15 Esk Road
Local Mixed Use Area	LMUA16 Kudhail Industrial Complex

New non-strategic sites – Community Facilities, collective IIA:

Site Name
CF01 Tollgate Medical Centre
CF02 West Beckton Health Centre
CF03 Lord Lister Health Centre
CF04 East Ham Memorial Hospital & Shrewsbury Road Medical Centre
CF05 Balaam Street Practice
CF07 Scott Wilkie Primary School
CF08 Eleanor Smith Lawson Close
CF09 Eastlea Secondary & Star Primary
CF11 Brampton Manor Academy
CF12 Langdon Academy
CF13 Forest Gate Community School
CF15 Eleanor Smith Primary School (North Road)
CF17 Colegrave Primary School
CF19 Sarah Bonnell School
CF20 Newham Sixth Form College
CF21 Odessa Infant School and St James Primary
CF22 Maryland Children's Centre and Primary School

Comments on the I&O stage IIA:

Representations	LPA Commentary	Action
Environment Agency		
Suggestion that 'key sources' should refer to EA flood maps and not just our own SFRA as they are updated quarterly	Appropriate.	Reference added to Table 2
Comments that Table 4 (setting out IIA objectives, relevant appraisal questions, and possible indicators to be embedded in the Local Plan) could specify querying whether an allocation or policy steers development away from flood risk as far as possible and is in line with the sequential test. Also suggests potential indicators including number of new developments incorporating SUDS, number of properties affected by a flood event, number of developments located in flood risk areas	<p>A principle embedded in the Local Plan is that within sites, schemes should direct most vulnerable uses to least vulnerable locations (in terms of flooding). The site allocations themselves are considered by the Sequential Test, to be published alongside the IIA as part of proposed submission documents. That said the questions are logical and will be clarified in the IIA framework.</p> <p>The 'number of developments' within a flood risk area is not considered an accurate measure of flood risk mitigation (nor is it clear how that would be quantified when a single large development might replace a number of properties); developments are encouraged to become more flood resilient and the flood risk areas within Newham are already heavily developed.</p> <p>While amount of run-off diverted from centralized drainage systems might be a more</p>	<p>Added to example appraisal questions</p> <p>No change</p> <p>Add indicators to the Local Plan monitoring framework</p>

	<p>meaningful measure of the impact of SUDS, that would be impossible to monitor. An indicator regarding the proportion of developments within CDAs incorporating SUDS features will be added, along with an indicator regarding the proportion of major developments delivering greenfield run-off at consent stage. The frequency and severity of surface water flood incidents (as already flagged in Table 4) is a useful indicator that is already monitored by the LLFA.</p> <p>As per LLFA reporting, the number of properties affected by flood events will be monitored. Where those properties are from consents within the plan period, further investigation should occur (it is considered likely that the majority of properties affected would be older).</p>	<p>Add to Local Plan monitoring framework</p>
<p>A request for it to be emphasised throughout the Local Plan that any new development be carried out in such a way as to reduce the risk of flooding to people.</p>	<p>This is now embedded in policy SC3 as drafted, no change to the IIA is considered necessary.</p>	<p>Check wording of Local Plan policies to ensure the principle of all development 'minimising' flood risk is fully embedded; also check the plan expresses the need and methods of reducing flood risk overall (i.e. through improved development resilience and flood defence / drainage infrastructure improvement).</p>
<p>Historic England</p>		
<p>The level of detail provided in the borough portrait is still quantitative and does not provide a broad understanding of qualitative heritage characteristics of the borough and associated contributions to the economic, social and environmental wellbeing of the area.</p>	<p>This is explored in more depth in the Character Study, to avoid repetition of work a link will be added</p>	<p>Edit to Borough Portrait part x.</p>

<p>Disappointed that heritage assets and the historic environment are not explicitly identified as a sustainability issue. Concern that without explicit reference to heritage issues or clarification of the term ‘place-making assets’, the heritage objective in table 4 is disconnected from the preliminary identification of issues.</p>	<p>Reasonable observation</p>	<p>Edit to Table 3</p>
<p>Natural England</p>		
<p>Consider impact on Thames biodiversity as part of site allocations’ IIA. Further to objective 12, new Marine Conservation Zones and marine species relevant to this part of the Thames should be considered. Site IIAs should also establish a biodiversity baseline using a suitable metric (examples given).</p>	<p>Available information suggests there are no MCZs relevant to Newham. Impacts on Thames ecology are already considered under objective 12 which flag the need to protect and enhance habitats and adjacency to designated SINCS.</p>	<p>No change</p>
<p>Other</p>		
<p>English Cities Fund commented that the summary IIA of proposed changes to the S13 Manor Road allocation is flawed. Specifically that there is no evidence of open space deficiency (based on the Council’s 2010 Open Space Assessment), or that the viability impacts of the change would be minor.</p>	<p>S13 contains an existing park; re-provision of that park (i.e. a park of at least comparable quantum and quality) is not new, it is specified in the strategic site allocation in place since 2012. The only part of the proposed allocation that <i>is</i> new (and thus the subject of this IIA) is the addition of the specification ‘central’. Policy principles dictate that redevelopment of any open spaces should enhance quality, part of that would be improving access by centralizing, rather than marginalizing, the space. This principle is not considered new.</p> <p>S13 is within an area of district park deficiency as per maps included in the Detailed Sites and</p>	<p>No change</p>

	<p>Policies DPD; these are based on current London Plan methodology (Table 7.2) rather than LBN's out-of-date 2010 Open Space Assessment. The presence of the existing park (Malmesbury Road Park) is the reason the location is not also Small Open Space deficient.</p> <p>The IIA is sound and does not examine development viability; this is done via the Viability Report prepared to accompany Local Plan Review.</p>	
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Next Steps

- 7.6 This Proposed Submission version of the IIA report constitutes the second iteration of 'Stage C' and will be subject to consultation for a period of 6 weeks along with the Proposed Submission Draft Local Plan and associated supporting documents. The consultation will be publicised as per the Statement of Consultation and available via www.newham.gov/planningconsultations
- 7.7 Any clarifications or changes between this version and submission version will be tracked.

APPENDIX 1 – REVIEW OF RELEVANT PLANS, POLICIES & PROGRAMMES

This summary looks at the European, national, regional, and local level and incorporates legislation, regulations, strategies, directives, plans, policies and programs that are pertinent to the formation of a Local Plan. Each document is summarized and the links to associated IIA objectives indicated.

EUROPEAN

Please note that simplified names for documents are given in some cases for the sake of clarity, the EU reference provided indicates the specific version relied upon.

EU STRATEGIES	Summary
Biodiversity Strategy to 2020 (2012)	The European Commission adopted an ambitious new strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020. There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted. The six targets cover: full implementation of EU nature legislation to protect biodiversity; better protection for ecosystems, and more use of green infrastructure; more sustainable agriculture and forestry; better management of fish stocks; tighter controls on invasive alien species; a bigger EU contribution to averting global biodiversity loss. The new Biodiversity Strategy follows on from the 2006 Biodiversity Action Plan.
Biodiversity Action Plan (2006)	The EU Biodiversity Action Plan addresses the challenge of integrating biodiversity concerns into other policy sectors in a unified way. It specifies a comprehensive plan of priority actions and outlines the responsibility of community institutions and Member States in relation to each. It also contains indicators to monitor progress and a timetable for evaluations. The European Commission has undertaken to provide annual reporting on progress in delivery of the Biodiversity Action Plan. A baseline report was prepared in 2010 to take stock of the 2006 Biodiversity Action Plan and assess the impact it has had on Europe's biodiversity. The report produced by the European Environment Agency, provides the latest facts and figures on the state and trends of different biodiversity and ecosystems components in the EU.
European Landscape Convention (ratified by the UK Government in 2006)	The European Landscape Convention (ELC) is the first international convention to focus specifically on landscape, and is dedicated exclusively to the protection, management and planning of all landscapes in Europe. The ELC was signed by the UK government on 24 February 2006, ratified on the 21 November 2006, and became binding on 1 March 2007. The convention highlights the need to recognize landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy, including cultural, economic and social policies.
EU Sustainable Development Strategy 2002 (reviewed 2009)	The overall aim of the EU Sustainable Development Strategy is to identify and develop action to enable the EU to achieve a continuous long-term improvement of quality of life through the creation of sustainable communities able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion.
EU DIRECTIVES	Summary

Air Quality Directive (2008/50/EC)	<p>This Directive is on ambient air quality and cleaner air for Europe and includes the following key elements:</p> <ul style="list-style-type: none"> - The merging of most of existing legislation into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives. - New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target - The possibility to discount natural sources of pollution when assessing compliance against limit values - The possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.
Environmental Noise Directive (2002/49/EC)	<p>The Environmental Noise Directive or END concerns noise from road, rail and air traffic and from industry. It focuses on the impact of such noise on individuals, complementing existing EU legislation which sets standards for noise emissions from specific sources. The Directive requires:</p> <ul style="list-style-type: none"> - the determination of exposure to environmental noise, through noise mapping - provision of information on environmental noise and its effects on the public - adoption of action plans, based upon noise mapping results, which should be designed to manage noise issues and effects, including noise reduction if necessary - Preservation by the member states of environmental noise quality where it is good. <p>The Directive requires mapping and action planning in relation to noise from major roads, major railways, and airports and in agglomerations (large urban areas).</p>
Natural Habitats Directive (1992/43/EEC)	<p>The main aim of this Directive is to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. While the Directive makes a contribution to the general objective of sustainable development; it ensures the conservation of a wide range of rare, threatened or endemic species, including around 450 animals and 500 plants. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right.</p>
Conservation of Birds Directive (2009/147/EC)	<p>This Directive ensures far-reaching protection for all of Europe's wild birds, identifying 194 species and sub-species among them as particularly threatened and in need of special conservation measures.</p>
Energy Performance of Buildings Directive (2002/91/EC)	<p>The objective of this Directive is to promote the improvement of the energy performance of buildings within the Community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness considering;</p> <p>This Directive lays down requirements as regards :</p> <ul style="list-style-type: none"> (a) the general framework for the energy performance of buildings; (b) the application of minimum requirements on the energy performance of new buildings; (c) the application of minimum requirements on the energy performance of large existing buildings that are subject to major renovation; (d) energy certification of buildings; and (e) regular inspection of boilers and of air-conditioning systems in buildings and in addition an assessment of the heating installations in which boilers are more than 15 years old.

Environmental Impact Assessment Directive (2014/52/EU)	<p>The newly amended Environmental Impact Assessment (EIA) Directive (2014/52/EU) entered into force on 15 May 2014 to simplify the rules for assessing the potential effects of projects on the environment. It is in line with the drive for smarter regulation, so it reduces the administrative burden. It also improves the level of environmental protection, with a view to making business decisions on public and private investments more sound, more predictable and sustainable in the longer term.</p> <p>It applies to a wide range of defined public and private projects, which are defined in Annexes I and II. All projects listed in Annex I are considered as having significant effects on the environment and require an EIA. For projects listed in Annex II, the national authorities have to decide whether an EIA is needed. This is done by the "screening procedure", which determines the effects of projects on the basis of thresholds/criteria or a case by case examination.</p>
Flood Risk Directive (2007/60/EC)	This Directive requires Member States to assess if all water course and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. This Directive also reinforces the rights of the public to access this information and to have a say in the planning process.
Groundwater Directive (2006/118/EC)	<p>This Directive establishes specific measures as provided for in Article 17(1) and (2) of Directive 2000/60/EC in order to prevent and control groundwater pollution. These measures include in particular:</p> <p>(a) criteria for the assessment of good groundwater chemical status; and</p> <p>(b) criteria for the identification and reversal of significant and sustained upward trends and for the definition of starting points for trend reversals.</p> <p>This Directive also complements the provisions preventing or limiting inputs of pollutants into groundwater already contained in Directive 2000/60/EC, and aims to prevent the deterioration of the status of all bodies of groundwater.</p>
Landfill Directive (1999/31/EC)	<p>The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills.</p> <p>The Directive is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.</p>
Renewable Fuels for Transport Directive (2003/30/EC)	Objective to promote the use of bio-fuels or other renewable fuels to replace diesel or petrol for transport purposes in each Member State, with a view to contributing to objectives such as meeting climate change commitments, environmentally friendly security of supply and promoting renewable energy sources
Renewable Energy Directive (2009/28/EC)	The Directive on renewable energy sets ambitious targets for all Member States, such that the EU will reach a 20% share of energy from renewable sources by 2020 and a 10% share of energy specifically in the transport sector. It also improves the legal framework for promoting renewable electricity, requires national action plans that establish pathways for the development of renewable energy sources including bio-energy, creates cooperation mechanisms to help achieve the targets cost effectively and establishes the sustainability criteria for bio-fuels.
Strategic Environmental Assessment (SEA) Directive (2001/42/EC)	Provides for the high level of protection of the environment and contributes to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. Requirements of the Directive must be met in the SEA/SA of the Local Plan; the plan must be assessed in accordance with the Directive.

Urban Waste Water Directive (91/271/EEC)	The Council Directive 91/271/EEC concerning urban waste-water treatment was adopted on 21 May 1991. Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of Domestic waste water, Mixture of waste water and Waste water from certain industrial sectors (see Annex III of the Directive)
Waste Framework Directive (2008/98/EC)	To set up a system for the coordinated management of waste within the European Community in order to limit waste production. Member states must promote the prevention, recycling and conversion of wastes with a view to their reuse.
Water Framework Directive (2000/60/EC)	The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. It indicates the importance of applying and developing SUDS policy. (2015-2021 = second management cycle)
Industrial Emissions Directive (2010/75/EU)	This directive commits European Union member states to control and reduce the impact of industrial emissions on the environment.

NATIONAL

UK LEGISLATION	Summary
Air Quality Standards Regulations (2010)	These regulations transpose into English law the requirements of Directives 2008/50/EC and 2004/107/EC on ambient air quality.
Building Regulations: England & Wales	<p>Part L - Conservation of fuel and power</p> <p>The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect in 2013 and 2014. DCLG has published:</p> <p>The 2013 edition of Approved Document L1A, Conservation of fuel and power in new dwellings, is the current edition for use in England. It came into effect on 6 April 2014 and replaces the 2010 edition (incorporating further 2010 amendments).</p> <p>Part G - Sanitation, hot water safety and water efficiency</p> <p>The 2015 edition contains changes to the water efficiency requirements. In particular, it introduces an optional requirement of 110 litres/person/day where required by planning permission, and an alternative fittings-based approach to demonstrating compliance. It also includes the water-efficiency calculation methodology for new dwellings, approved by the Secretary of State. This edition incorporates previous amendments. It replaces the 2010 edition of Approved Document G, as amended. The changes reflect amendments to regulations 36 and 37 of the Building Regulations 2010 and regulation 20 of the Building (Approved Inspectors) Regulations 2010. There has been no amendment to the requirements in Part G of Schedule 1 to the Building Regulations 2010.</p> <p>Part H - Drainage and waste disposal</p> <p>The 2015 edition of Approved Document H (Drainage and Waste Disposal) contains changes to guidance on waste disposal. It also incorporates previous amendments. The 2015 edition takes effect on 1 October 2015 for use in England*. The 2002 edition, as amended, will continue to apply to work started before 1 October 2015 or work subject to a building notice, full</p>

Climate Change Act (2008)	The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by: <ul style="list-style-type: none"> - setting ambitious, legally binding targets - raking powers to help meet those targets - strengthening the institutional framework - enhancing the UK's ability to adapt to the impact of climate change - establishing clear and regular accountability to the UK Parliament and to the devolved legislatures
Community Infrastructure Levy Regulations (2010) (as amended)	The Community Infrastructure Levy (the levy) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes new or safer road schemes, flood defences, schools, hospitals and other health and social care facilities, park improvements, green spaces and leisure centres.
Civil Contingencies Act 2004 (CCA)	Legislation that aims to provide a single framework for civil protection. The Act and accompanying non-legislative measures, delivers a single framework for civil protection in the country. The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office's initiative to develop wider community resilience to threats and hazards. Part 1 of the Act and supporting Regulations and statutory guidance establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. They are required to: <ul style="list-style-type: none"> • assess the risk of emergencies occurring and use this to inform contingency planning; put in place emergency plans; • put in place Business Continuity Management arrangements;
The CROW Act 2000	An Act to make new provision for public access to the countryside; to amend the law relating to public rights of way; to enable traffic regulation orders to be made for the purpose of conserving an area's natural beauty; to make provision with respect to the driving of mechanically propelled vehicles elsewhere than on roads; to amend the law relating to nature conservation and the protection of wildlife; to make further provision with respect to areas of outstanding natural beauty; and for connected purposes.
Energy Act 2011	The Energy Act provides for some of the key elements of the Coalition's Programme for Government and its first Annual Energy Statement. It is a first step in our legislative programme, and further legislation has been sought to implement, for example, the findings of the Electricity Market Reform Programme. The Act provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to our framework to enable and secure low-carbon energy supplies and fair competition in the energy markets.
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts
Environmental Noise (England) Regulations 2006 (as amended)	The regulations transpose the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Growth and Infrastructure Act 2013	An Act to make provision in connection with facilitating or controlling the following, namely, the provision or use of infrastructure, the carrying-out of development, and the compulsory acquisition of land; to make provision about when rating lists are to be compiled; to make provision about the rights of employees of companies who agree to be employee shareholders; and for connected purposes
Human Rights Act 1998	An Act to give further effect to rights and freedoms guaranteed under the European Convention on Human Rights

Local Democracy, Economic Development and Construction Act 2009	The Act seeks to create greater opportunities for community and individual involvement in local decision-making. It also provides for greater involvement of local authorities in local and regional economic development
Local Government Act 2000	This act received Royal Assent in July 2000 and is made up of three parts: <ul style="list-style-type: none"> - Part I introduces a new power for local authorities to promote the economic, social or environmental wellbeing of an area. - Part II requires that all local authorities move away from the traditional committee style of decision making in which all members had a formal decision-making role, to one of four executive models. These are; leader or cabinet, mayor or cabinet, mayor or council manager, or alternative arrangements. - Part III introduces a new ethical framework for councils, including a requirement to adopt a code of conduct for members and implement a standards committee. The general functions of the standards committee are to promote and maintain high standards of conduct within the local authority, and to assist members of the authority to observe the code of conduct.
Localism Act (2011)	An Act to make provision about the functions and procedures of local and certain other authorities; to make provision about the functions of the Commission for Local Administration in England; to enable the recovery of financial sanctions imposed by the Court of Justice of the European Union on the United Kingdom from local and public authorities; to make provision about local government finance; to make provision about town and country planning, the Community Infrastructure Levy and the authorisation of nationally significant infrastructure projects; to make provision about social and other housing; to make provision about regeneration in London; and for connected purposes.
Equality Act (2010)	This act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. This makes the law easier for people to understand and comply with. The act also strengthened protection in some situations. The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment. The protected characteristics are: Age Disability gender reassignment marriage and civil partnership pregnancy and maternity race religion or belief sex sexual orientation
Flood and Water Management Act (2010)	This Act provides a more comprehensive management of flood risk for people, homes and businesses, protects water supplies to the consumer and helps safeguard community groups from unaffordable rises in surface water drainage charges. The Act introduces into law the concept of flood risk management rather than 'flood defence' and provides the framework for delivery of flood and coastal erosion risk management through national and local risk strategies. The Act establishes a SuDS approving body (SAB). The SAB will have responsibility for the approval of proposed drainage systems in new developments and redevelopments (in accordance with National Standards for Sustainable Drainage). The Act requires Lead Local Flood Authorities (LLFA's) to maintain a register and record important flood risk management strategies and to investigate flooding to determine which authority has
London Squares Preservation Act, 1931	This act identifies a London Squares which are to be provided protection from development.
Natural Environment White Paper (2011)	The Natural Environment White Paper recognises that a healthy natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing. It sets out how the value of nature can be mainstreamed across our society by facilitating local action; strengthening the connections between people and nature; creating a green economy and showing leadership in the EU and internationally. It set out 92 specific commitments for action.
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act was published by Parliament and is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.

The Neighbourhood Planning (General) Regulations (2012)	The Regulations set out the procedure for the designation of neighbourhood areas and neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders). A separate instrument will be brought forward in relation to neighbourhood planning referendums.
The Neighbourhood Planning (General) (Amendment) Regulations 2015	These Regulations amend the Neighbourhood Planning (General) Regulations 2012 which made provision for neighbourhood planning as provided in the Localism Act 2011
Planning Act (2008)	The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new stream-lined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy (CIL).
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on-site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning (Listed Buildings and Conservation Areas) Act (1990)	This Act consolidates certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest.
Pollution Prevention and Control Act (1999)	This Act gives the Secretary of State the power to make regulations providing for a new pollution control system to meet the requirements of European Council Directives on Integrated Pollution Prevention and Control and for other measures to prevent and control pollution.
Sustainable Communities Act (2007) (Amendment 2010)	The Sustainable Communities Act 2007 provides local authorities and local communities with the opportunity to ask central government to devolve more power to them in order to improve the sustainability of their local area. The amendment improves the process to allow communities a greater say in how their proposed changes can happen
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales
The Town and Country Planning (Environmental Impact Assessment) Regulations (2011)	These regulations are used to determine whether a planning application will require an Environmental Impact Assessment (EIA). These Regulations replace the Town and Country Planning (Environmental Impact assessment (England and Wales) Regulations 1999 (SI No. 293) ("the 1999 regulations") and subsequent amending instruments. The Town and Country Planning (Environmental impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales.
The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995	These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.

The Town and Country Planning (General Permitted Development) (England) Order 2015	The main purpose of this Order is to grant planning permission for certain classes of development without any requirement for an application to be made under Part III of the Town and Country Planning Act 1990.
The Town and Country Planning (Compensation) (England) Regulations (2012)	The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 (“GPDO”)
The Town and Country Planning (Compensation) (England) (Amendment) Regulations (2014)	The Town and Country Planning (Compensation) (England) (Amendment) Regulations 2014 (“the Compensation Regulations”) amend the Town and Country Planning (Compensation) (England) Regulations 2013 to limit the circumstances in which compensation is payable in the event that the new permitted development rights are withdrawn.
The Town and Country Planning (Local Planning) (England) Regulations 2012	These regulations amend the Town and Country Planning (Local Development) (England) Regulations 2009, in response to the enactment of the Localism Act 2011
The Town and Country Planning (Major Infrastructure Project Inquiries Procedure) (England) Rules 2005	These rules outline the procedures to be followed for local inquiries into 1) applications for planning permission or 2) the approval of local planning authorities for major developments deemed to have national or regional importance.
The Town and Country Planning (Modification and Discharge of Planning Obligations) Regulations 1992	This Regulation gives further detail to the procedure for appeals against enforced planning obligations.
The Town and Country Planning (Tree Preservation) (England) Regulations 2012	Local planning authorities protect trees in the interests of amenity by making Tree Preservation Orders (TPOs). Provisions are spread across primary and various secondary legislation and different rules apply depending on when the TPO is made.
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	This amendment introduces a definition of houses in multiple occupations into the Use Classes Order.
The Town and Country Planning (Use Classes) Order 1987	This Order revokes and replaces the Town and Country Planning Order 1972 as amended by the Town and Country Planning Order 1983.
The Wildlife and Countryside Act (1981) - as amended	Consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version).
UK PLANNING FRAMEWORK	<i>Summary</i>

National Planning Policy Framework (NPPF) (2012)	The Government has produced a simple national planning policy framework setting out their priorities for the planning system in England in a single, concise document covering all major forms of development proposals handled by local authorities. All the national planning policies set out in PPSs, MPSs, PPGs and MPGs, have been superseded by the NPPF. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
National Planning Practice Guidance (NPPG) (2014)	On 6 March 2014 the Department for Communities and Local Government (DCLG) launched this planning practice guidance web- based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents cancelled when this site was launched. For the first time, planning practice guidance is now available entirely online in a usable and accessible way
Planning Policy for Traveller Sites (2015)	Planning Policy for Traveller Sites provides guidance and advice on both plan-making and decision taking in relation to gypsy and traveller accommodation. In August 2015, DCLG updated the Planning Policy for Traveller Sites to reflect the new planning definition of Gypsies and Traveller, restricting it to only those who lead a nomadic lifestyle.
GOVERNMENT STRATEGIES	<i>Summary</i>
Air Quality Strategy (2007)	The Strategy: sets out a way forward for work and planning on air quality issues; sets out the air quality standards and objectives to be achieved; introduces a new policy framework for tackling fine particles; identifies potential new national policy measures which modeling indicates could give further health benefits and move closer towards meeting the Strategy's
Biodiversity – The UK Action Plan (1994)	The Action Plan is the UK Government's response to the Convention on Biological Diversity (CBD) signed in 1992. It describes the UK's biological resources and commits a detailed plan for the protection of these resources. The first lists of Priority Species and Habitats were published by Government in 1995 as part of the UK Biodiversity Action Plan (UK BAP). They included over 300 species of which 11 were butterflies and 53 were moths.
Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system.- Government circular	This circular provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.
Conserving Biodiversity – the UK approach (DEFRA 2007)	This statement has been prepared by the UK Biodiversity Standing Committee ¹ on behalf of the UK Biodiversity Partnership. Its purpose is to set out the vision and approach to conserving biodiversity within the UK's devolved framework for anyone with a policy interest in biodiversity conservation. It sets out an approach to biodiversity conservation that is designed not only to meet the commitment to halt the loss of biodiversity by 2010, but to guide action well into the second decade of the 21st century at a time when the challenges faced by the natural environment are great.

<p>Department of Health Public Health Strategy – healthy lives, healthy people (July 2011)</p>	<p>This policy statement sets out the progress the government has made in developing the new public health system. In doing so the paper sets out how the government expect the reformed public health system to work including</p> <ul style="list-style-type: none"> • clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare; • proposals for who is responsible for commissioning the different public health services; • the mandatory services local authorities will be required to provide; • the grant conditions we expect to place on the local authority public health grant; • establishing Public Health England as an Executive Agency to provide greater operational independence within a structure that is clearly accountable to the Secretary of State for Health;
<p>The Sustainable Development Strategy for the NHS, Public Health and Social Care System</p>	<p>This strategy outlines a vision and three goals based on the challenges outlined above to aim for by 2020. It describes the opportunities to reduce our environmental impacts, improve our natural environment, increase readiness for changing times and climates and strengthen social cohesion. It also explores how this can be taken forward as a system and outlines specific areas of focus that can be used to guide action.</p>
<p>Departments of Health and Transport- Active Travel Strategy 2010</p>	<p>The Department of Health and Department for Transport jointly published a new Active Travel Strategy. The strategy highlights plans to put walking and cycling at the heart of local transport and public health strategies over the next decade. The guiding principles for the strategy are that walking and cycling should be everyday ways of getting around – not just for their own sake but also because of what they can do to improve public health, tackle congestion, reduce carbon emissions and improve the</p>
<p>Healthy Weight Healthy Lives: Government Strategy for England (2008) A Cross</p>	<p>This cross-government strategy is the first step in a sustained programme to support people to maintain a healthy weight. It will be followed by a public annual report that assesses progress, looks at the latest evidence and trends, and makes recommendations for further action.</p>
<p>Biodiversity 2020: A strategy for England’s wildlife and ecosystem services and its outcomes and actions</p>	<p>This new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea</p>
<p>Noise Policy Statement for England (DEFRA 2010)</p>	<p>This statement sets out the long term vision of Government noise policy, which is to promote good health and a good quality of life through the management of noise within the context of Government policy on sustainable development. The policy seeks to make explicit the implicit underlying principles and aims regarding noise management and control that are to be found in existing policy documents, legislation and guidance.</p>

Plan for Growth (March 2011)	<p>The Government’s economic policy objective is to achieve strong, sustainable and balanced growth that is more evenly shared across the country and between industries. The Plan for Growth contains four overarching ambitions that will ensure the progress is made towards achieving this economic objective. The ambitions are:</p> <ol style="list-style-type: none"> 1. to create the most competitive tax system in the G20; 2. to make the UK one of the best places in Europe to start, finance and grow a business; 3. to encourage investment and exports as a route to a more balanced economy;
Mainstreaming sustainable development (2011)	<p>This document sets out the Coalition Government’s vision for sustainable development and a package of measures to deliver it through the Green Economy, action to tackle climate change, protecting and enhancing the natural environment, and fairness and improving wellbeing, and building a Big Society</p>
Strategic Review of Health Inequalities in England Post 2010 (The Marmot Review)	<p>In November 2008, Professor Sir Michael Marmot was asked by the Secretary of State for Health to chair an independent review to propose the most effective evidence-based strategies for reducing health inequalities in England from 2010. The strategy will include policies and interventions that address the social determinants of health inequalities.</p> <p>The Review had four tasks</p> <ol style="list-style-type: none"> 1 Identify, for the health inequalities challenge facing England, the evidence most relevant to underpinning future policy and action 2 Show how this evidence could be translated into practice 3 Advise on possible objectives and measures, building on the experience of the current PSA target on infant mortality and life expectancy 4 Publish a report of the Review’s work that will contribute to the development of a post-2010 health inequalities strategy
Construction 2025 (2013)	<p>This Strategy is aimed at providing clarity around the existing policy framework and signaling the future direction of Government policy. It aims to realize the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> • Providing clarity to business on the Government’s position by bringing together diverse regulations and initiatives relating to sustainability; • Setting and committing to higher standards to help achieve sustainability in specific areas; • Making specific commitments by industry and Government to take the sustainable construction agenda forward
Adapting to climate change: national adaptation programme (2013)	<p>The National Adaptation Programme sets out what government, businesses and society are doing to become more climate ready. It contains a register of actions which includes all the actions agreed in the programme so far. It also aligns risks identified in the Climate Change Risk Assessment to actions being undertaken or to be undertaken and the timescales according to each</p>
The Carbon Plan: Delivering our low carbon future (2011)	<p>This plan sets out how the UK will achieve de-carbonization within the framework of our energy policy: to make the transition to a low carbon economy while maintaining energy security, and minimizing costs to consumers, particularly those in poorer households.</p>

UK Renewable Energy Strategy (2009)	<p>The Renewable Energy Strategy sets a path towards increasing UK generation of renewable projects. It sets out the actions the Government is taking to ensure the targets of producing 15% of UK energy needs from renewable energy sources by 2020 are met. To achieve this the strategy calls for:</p> <ul style="list-style-type: none"> - 30% of electricity supply to come from renewable sources, including 2% from micro generation - 12% of heat supply to come from renewable sources - 10% of transport supply from renewable sources
UK Sustainable Procurement Action Plan (2007)	<p>The Government launched a package of actions to deliver the step change needed to ensure that supply chains and public services will be increasingly low carbon, low waste and water efficient, respect biodiversity and deliver wider sustainable development goals.</p> <p>The Action Plan puts in place clear lines of accountabilities and reporting, and develops plans to raise the standards and</p>
Future Water: The Government's Water Strategy for England (2011)	<p>This includes: sustainable delivery of secure water supplies, an improved and protected water environment, fair, affordable and cost- reflective water charges, reduced water sector greenhouse gas emissions and more sustainable and effective management of surface water.</p>
Waste Management Plan for England (2013)	<p>The waste management plan for England (WMPE) provides an analysis of the current waste management situation in England and fulfils the mandatory requirements of article 28 of the revised Waste Framework Directive (rWFD). The plan does not introduce new policies or change the landscape of how waste is managed in England. Its core aim is to bring current waste management policies under the umbrella of one national plan.</p>
National Flood and Coast Erosion Management Strategy (July 2011)	<p>Objectives are to:</p> <ul style="list-style-type: none"> - ensure a clear understanding of the risks of flooding and coastal erosion - set out clear and consistent plans for risk management - manage flood and coastal erosion risks in an appropriate way - ensure that emergency plans and responses to flood incidents are effective - help communities to recover more quickly and effectively after incidents.
National Flood Emergency Framework	<p>In planning and preparing for a flooding emergency, the Government's strategic objectives are to:</p> <ul style="list-style-type: none"> - protect human life and alleviate suffering; and, as far as possible, property and the environment; - support the continuity of everyday activity and the restoration of disrupted services at the earliest opportunity; and - Uphold the rule of law and the democratic process.
Prevention is better than cure: the role of waste prevention in moving to a more resource efficient economy (2013)	<p>This document sets out the Waste Prevention Programme for England. It articulates the actions for government and others which together will move us towards reducing waste. The aim of the Programme is to improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.</p>

NHS Five Year Forward View (2014)	The NHS Five Year Forward View was published on 23 October 2014 and sets out a vision for the future of the NHS. It has been developed by the partner organisations that deliver and oversee health and care services including NHS England, Public Health England, Monitor, Health Education England, the Care Quality Commission and the NHS Trust Development Authority. Patient groups, clinicians and independent experts have also provided their advice to create a collective view of how the health service needs to change over the next five years if it is to close the widening gaps in the health of the population, quality of care and the funding of services.
UK GUIDANCE	<i>Summary</i>
A Practical Guide to the Strategic Environmental Assessment Directive	Practical guidance, published in September 2005, on applying European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”.
BREEAM (2008)	BREEAM addresses wide-ranging environmental and sustainability issues and enables developers and designers to prove the environmental credentials of their buildings. It uses a straightforward scoring system that is transparent, easy to understand and supported by evidence-based research; has a positive influence on the design, construction and management of buildings and sets and maintains a robust technical standard with rigorous quality assurance and certification
Environment Agency - Creating a better place. Our corporate strategy (2010-2015)	This strategy sets out the Environment Agency’s aims for the period to 2015 and describes the role they will play in being part of the solution to the environmental challenges society faces. It sets out how the EA will continue to review their priorities and ways of working to ensure value for money whilst creating a better place for people and the environment.
Environment Agency – Climate Change, adapting for tomorrow (2009)	This report shows how the Environment Agency are working, often in partnership with others, to help communities and businesses adapt, while still protecting the natural environment.
Environment Agency – Building a better environment. A guide for developers (2006)	This guide provides advice on making sure development contributes to the long-term environmental quality of our country. The guide gives practical advice on each of the environmental issues that may affect a site. This ranges from how you can reduce flood risk through to creating quality green space in your development. It gives pointers for building sustainable, cost-effective homes, helping create an environment in which people will really want to live. It also provides examples of sites where this good practice has already been applied.
Environment Agency: guidance for developments requiring planning permission and environmental permits 2012	This guidance sets out how the Environment Agency will respond to planning consultations that require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2010 (EPR).
Environment Agency Policy paper: Preliminary flood risk assessments and flood risk areas (2011) and Map of Flood Risk areas in England	The Environment Agency (EA) is responsible for managing flood risk from main rivers, the sea and reservoirs. Lead local flood authorities, unitary authorities or county councils, are responsible for local sources of flood risk, in particular surface water, groundwater and ordinary watercourses. To manage flood risk both EA and lead local flood authorities must follow a 6 year cycle of planning. The current planning cycle runs from 2010 to 2015.

Environment Agency Green roof Toolkit	<p>Environment Agency on-line toolkit which sets out guidance for site specific opportunities, green roof design and technical assessment</p> <p>The vision is that developers will promote the use of green roofs to:</p> <ul style="list-style-type: none"> - create a better and more sustainable London - deliver better quality places to live and work - create a low-carbon city - adapt to and mitigate the effects of climate change
Environment Agency: Groundwater Protection: Principles and Practice (GP3)	The GP3 document is a key Environment Agency reference for LPAs, developers and land owners. It sets out our approach to groundwater protection and management and what we want others to do. It covers our high-level approach, the technical background to our work and an introduction to the tools we use. It also describes the legal framework the EA works within and the approaches and positions it takes to regulate and influence certain activities and issues.
Environment Agency: Guiding Principles for Land Contamination (2010)	The GPLC documents were developed initially for landowners, developers, advisors and practitioners involved in redevelopment and evaluation of land contamination. These documents refer to relevant UK guidance and highlight specific steps and considerations involved in evaluating risks associated with land and water contamination.
Water for Life (2011) Government White paper	The Water White Paper focuses on the challenges facing the water sector, including maintaining water supplies, keeping bills affordable and reducing regulation. It recognises the need to protect rivers, streams and lakes from pollution and unsustainable abstraction, and acknowledges the critical importance of water supply and sewerage infrastructure.
Forestry Commission – The case for trees	This document aims to inspire people involved in planning policy and practice to become champions and advocates for trees.
Neighbourhood Planning (2013)	Information on what neighbourhood planning is, why it matters, how it works, and sources of advice and support available for communities.
English Indices of Deprivation	The Index of Multiple Deprivation combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England. This allows each area to be ranked relative to one another according to their level of deprivation.
Model Procedures for the Management of Contaminated Land- Environment Agency.	<p>The Model Procedures for the Management of Land Contamination, CLR 11, have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination.</p> <p>The process involves identifying, making decisions on, and taking appropriate action to deal with land contamination in a way that is consistent with government policies and legislation within the UK.</p>

Natural England: A Natural Development (2009)	The Natural Development Project launched on 3 November 2009 to demonstrate how both large and small scale development can incorporate green infrastructure in practice. Natural England and key players in the development sector formed a partnership to understand how to value, design and create quality green infrastructure. The partnership aims to demonstrate how – at different scales and locations – the contribution of the natural environment in regeneration can move from that of traditional landscaping to one of providing vital spaces for people, wildlife, health, wellbeing, and climate change adaptation. The Natural Development project will provide a focus for our engagement with real sites and enable us to practically demonstrate positive planning with developers. It will work to highlight opportunities and overcome barriers to success and enable sharing of best practice to support the mainstreaming of green infrastructure in development and
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	This document contains policies and guidance for the sustainable management of the historic environment.
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	This guidance focuses on SEA/SA for development plans, building on existing Government advice; it is equally applicable to the preparation of SEAs for other types of documents, such as Local Transport Plans and Water Resource Management Plans.
Historic England Advice Note 4 – Tall Buildings (Dec 2015)	This Historic England Advice Note updates previous guidance by English Heritage and CABE, produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process.
Conservation Bulletin 47: Characterisation, English Heritage (2005)	A bulletin that explores the subject of characterization and sets out some examples of studies of local character.
Understanding Place: Historic Area Assessments in a Planning and Development Context, English Heritage (2010)	Sets out guidance for undertaking Historic Area Assessments to inform plan making and development management.
Understanding Place Historic Area Assessments: Principles and Practice, English Heritage (2010)	Sets out guidance for how to undertake assessments for historic areas in order to produce a Historic Area Assessment.
Valuing Places: Good Practice in Conservation Areas, English Heritage (2011)	Sets out a series of exemplary case studies for managing change in the historic environment.
The Setting of Heritage Assets, English	Sets out guidance for managing change within the settings of heritage assets.
Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, English Heritage (2011)	Sets out a method for understanding and assessing heritage significance of views.

Understanding Place: Character and context in local planning, English Heritage	Sets out case studies for how historic characterization can be used to inform plan making and development management decisions.
Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage (2011)	Sets out guidance for managing change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management.
Good Practice for Local Listing Consultation	Sets out best practice guidance for identifying buildings and structures suitable for local listing and for managing the list.
Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS (2010)	Sets out guidance for producing Heritage Impact Assessments for World Heritage Sites in order to evaluate the impact of potential development on the Outstanding Universal Value. This may also provide a guide for assessing general impact of development on heritage assets and their settings.
National Institute for Health and Clinical Excellence (NICE):Alcohol-use disorders: preventing harmful drinking	The guidance identifies how government policies on alcohol pricing, its availability and how it is marketed could be used to combat such harm. Changes in policy in these areas are likely to be more effective in reducing alcohol-related harm among the population as a whole than actions undertaken by local health professionals.
National Institute for Health and Clinical Excellence (NICE): Prevention of Cardiovascular disease at the population level	The guidance is for government, the NHS, local authorities, industry and all those whose actions influence the population's cardiovascular health (that is, can help keep people's hearts healthy and prevent strokes). The guidance comprises two sets of recommendations aimed at national policy makers and local practitioners respectively. Recommendations 1 to 12 outline a national framework for action. They break new ground for NICE by focusing on legislative, regulatory and voluntary changes – including further development of existing policies.
National Institute for Health and Clinical Excellence (NICE): Preventing unintentional injuries among children and young people aged under 15: road design and modification	This is one of three pieces of NICE guidance published in November 2010 on how to prevent unintentional injuries among under-15s. A second publication covers unintentional injuries in the home and a third covers strategies, regulation, enforcement, surveillance and workforce development. The guidance covers 20 mph limits, 20mph zones and engineering measures to reduce speed or make routes safer.
National Institute for Health and Clinical Excellence (NICE): Promoting physical activity: active play and sport for pre-school and school-age children and young people in family, pre-school, school and community settings	This guidance is for all those who are involved in promoting physical activity among children and young people, including parents and carers. The NICE recommendations give advice on: <ul style="list-style-type: none"> • how to promote the benefits of physical activity and encourage participation • high level strategic planning • the importance of consultation with children and young people and how to set about it • planning and providing spaces, facilities and opportunities • training people to run programs and activities • How to promote physically active travel such as cycling and walking.

National Institute for Health and Clinical Excellence (NICE): Promotion and creation of physical environments that support increased levels of physical activity	This guidance offers the first evidence-based recommendations on how to improve the physical environment to encourage physical activity. It is for NHS and other professionals who have responsibility for the built or natural environment. This includes local transport authorities, transport planners, those working in local authorities and the education, community, voluntary and private sectors. The seven recommendations cover strategy, policy and plans, transport, public open spaces, buildings and schools.
Planning sustainable cities for community food growing (2014)	This guide brings together in one place examples of planning policies around the UK that support community food growing. It is aimed primarily at planning authorities to help them to use food growing as a way of creating healthy communities.
No health without mental health: implementation framework (2012)	The Framework sets out what a range of local organizations can do to implement No Health Without Mental Health, and improve mental health outcomes in their area. It also outlines what work is underway nationally to support this, and how progress will be measured.
Local action on health inequalities: evidence papers (2014)	This research shows the evidence supporting action to reduce health inequalities.
Obesity: working with local communities; NICE guidelines [PH42]	This guidance aims to support effective, sustainable and community-wide action to prevent obesity. It sets out how local communities, with support from local organizations and networks, can achieve this.
Physical activity: walking and cycling NICE guidelines [PH41] (2012)	This guideline sets out how people can be encouraged to increase the amount they walk or cycle for travel or recreation purposes. This will help meet public health and other goals (for instance, to reduce traffic congestion, air pollution and greenhouse gas emissions).

REGIONAL

REGIONAL PLAN	Summary
The London Plan (March 2016)	The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. It forms part of the development plan for Greater London. London boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.
City for all Londoners – Mayor of London (consultation document October 2016)	The consultation document sets out the strategic ambitions and direction of travel for the Mayor of London. With the forthcoming London Plan Review the publication is a statement of the Mayors ambitions and vision for the city including accommodating London's growth, housing, the economy, environment, transport and public space to create a city for all Londoners. The document also outlines the Capital's top challenges and opportunity areas across priority policy areas alongside any forthcoming changes. There are three stages of consultation on this document. The document commits to further expansion in detailed strategies on land use and growth (London Plan)m transport, housing, economic development, the environment, policing and crime, culture and health inequalities.
GLA STRATEGIES / SPGs + OTHER REGIONAL GUIDANCE	

Air Quality Strategy (2010)	This strategy sets out a framework for delivering improvements to London’s air quality and includes measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues. Over the last few years, a number of innovative measures have been introduced to help improve air quality in London. Nevertheless, air pollution remains a problem in the capital, as is clear from the fact that European Union targets for air quality standards that were intended to be met in 2004 and 2005 have still not been achieved.
The control of dust and emissions from construction and demolition - Best	The GLA and London Councils have produced ‘Best Practice Guidance’ to control dust and emissions from construction and demolition. The Guidance will be used to inform the planning process within London boroughs; assisting developers in understanding the methods available to them and what London boroughs might expect. The Guidance will be reviewed regularly, in order to update new best practice in dust and emissions management.
A Digital Inclusion Strategy for London (2015)	This strategy outlines why digital exclusion is an issue for London and how the Mayor can work with partners to address the barriers people face to getting online. It provides data on the numbers and groups of people that are digitally excluded. It then explains the cost of digital exclusion to the individual, society and the economy. The Mayor is keen to use his office to work with partners to ensure as many Londoners who want to get online, have the opportunity to do so.
Equal Life Chances for All (2015)	The Equal Life Chances for All framework 2014 highlights the Mayor’s commitment to tackling inequality; improving life chances, and removing barriers that prevent people from reaching their full potential. The GLA will ensure that equality is mainstreamed into everything the organisation does, including how it obtains goods and services.
Mayors Annual Equality Report 2013/2014	The Mayor’s Annual Equality Report 2013/2014 highlights the progress made during the financial year April 2013 to March 2014 towards achieving the GLA’s revised equality objectives. It also gives the latest figures and trends for the indicators of progress.
Equal Life Chances for All – Measures Report (2011)	The Equal Life Chances for all Measures report sets out the most recent trends on measures of the delivery of policies and programmes directly under the control of the Mayor and his partners as well as statistical measures outside the Mayor’s direct influence.
Poverty in London: 2012/13	The number of Londoners living in poverty has seen little change over the last few years and remains at around 2.2 million people, or 28 per cent of all those living in the region, averaged over three years 2010/11-2012/13. Around 300,000 children in Inner London are living in poverty, with a further 400,000 in Outer London. The Inner London child poverty rate remains significantly higher than for any other region, at 45 per cent. Inner London also stands out as having exceptionally high rates of material deprivation among pensioners – more than double the rate for any other region with almost one in four unable to have or take part in the social norms for that population group for reasons of poverty, health or isolation.
A Fairer London: The 2014 Living Wage in London	This is the tenth London Living Wage report from the GLA, and calculates the wage for 2014 at £9.15 per hour (a 4.0 per cent increase on the 2013 wage). In the Mayor’s ‘2020 Vision’ for London he pledged to make the Living Wage the norm across the capital. There are now over 400 accredited London Living Wage employers plus a number who have chosen not to be accredited. Accredited Living Wage employers alone have now provided over 20,000 London workers the benefits of the Living Wage since 2011.

Accessible London: Achieving an Inclusive Environment SPG (2014)	This SPG provides guidance on the implementation of London Plan Policy 7.2 An inclusive environment and of other policies in the Plan with specific reference to inclusive design. It also provides guidance on Lifetime Neighbourhoods to support London Plan Policy 7.1 Building London's neighbourhoods and communities. One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, is able to participate and enjoy all that the city has to offer. To help achieve this aim the London Plan 2011 includes a number of policies which promote an inclusive environment to help ensure that all of London's diverse communities can contribute to London's growing economy and enjoy a high quality of life.
Violence Against Women and Girls Strategy 2013-2017	This strategy covers the following forms of violence against women and girls: • Domestic violence and abuse • Female Genital Mutilation (FGM) • Forced marriage • 'Honour'-based violence • Prostitution and trafficking • Sexual violence including rape • Sexual exploitation • Sexual harassment • Stalking • Faith-based abuse. This strategy is focused on the needs of women and girls and is a deliberate response to the disproportionate impact of VAWG crimes on women and girls.
Police and Crime Plan 2013	The Police and Crime Plan 2013-2016 outlines the Mayor's mission, priorities and objectives for tackling crime and making London safer.
2013 Round Ethnic Group Population Projections	The White population of Greater London is projected to be fairly stable at about 4.9 million over the next decade and increase very slightly thereafter, reaching 5.1 million in 2041. The BAME population of Greater London is projected to increase from 3.3 million in 2011 to 5.2 million in 2041. By the Census year 2011 the Black African population (576 thousand) had surpassed the Indian population
Hate Crime Reduction Strategy	The strategy sets out plans to boost confidence across all communities in reporting hate crime, develop ways to prevent offences and reduce repeat victimization and outlines how agencies can work together to ensure swift and sure justice for victims. Hate crime is defined as any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic, specifically race,
London Enriched (2009) and update (2013)	London Enriched is the Mayor's refugee integration strategy, setting out a vision for refugee integration in the capital, focusing on the right of refugees to live in dignity and security, sharing with other Londoners the same life chances and opportunities to contribute.
An evidence base on migration and integration in London	The report begins with a literature and demographic review presenting a picture of migration in London and the key issues around migrant integration. This draws together the state of the academic and policy literature with as recent as possible primary data provided by the GLA and UK Border Agency and original data analysis conducted by COMPAS. The work was conducted over two months in Spring 2010. The report presents the broad contours of
Planning for Equality and Diversity in London SPG (2007)	This SPG: <ul style="list-style-type: none"> - provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to equalities issues and addressing the needs of London's diverse communities; - sets out some of the tools for promoting equality and diversity in planning processes; - highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context; - sets out overarching principles and the key spatial issues for planning for equality; and examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these
Responding to the needs of faith communities: Report and evidence (2008)	CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned by the GLA in late 2007 to explore the needs of faith communities in relation to places of worship in London. This document reports on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London.

An A to Z of Planning and Culture (October 2015) – The Mayor of London	The short document aims to facilitate culture in the planning process including Section 106, policy, planning decision and stakeholder involvement. Prepared on the back of greater focus on facilitating culture across London. The guidance highlights how culture can be embedded in Local Plans, opportunities to sustain and protect culture within London e.g. cultural infrastructure) alongside case studies and best practice examples.
Culture SPG (TBC) – Mayor of London	Not yet published. This document is being prepared. The Mayor has indicated that culture is a priority including the night time economy. Awaiting details on this so the progression of this document should be noted.
Town Centres SPG (2014) – The Mayor of London	The SPG sets out how Town Centers can facilitate arts, culture, leisure and the night time economy to become vibrant and thriving hubs and better accommodate culture. It sets to encourage Boroughs to develop cultural quarters, facilitate the creative industries and address gaps in cultural facilities. Culture is set out in Chapter 1.
Cultural Metropolis 2014 - The Mayor's culture strategy for London	The Mayor's Cultural Strategy sets out the vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. It recognises the significance of the cultural and creative sectors in making London a successful world city, and puts forward a case for its continued support and investment. It includes an update on the policy achievements and next steps in: Maintaining London's position as a world city of culture, Widening the reach, Education and skills, Infrastructure, environment and the public realm. It provides a recap of the cultural triumphs and cultural legacy from the Games.
Culture on the high street guide 2013	The Culture on the High Street guide will help local authorities, town centre managers and business improvement districts to improve the quality and ambition of culture on our high street.
Culture & regeneration - What evidence is there of a link and how could it be measured? (2011)	Despite much research, there have been few comprehensive evaluations of culture-led regeneration schemes and so a good evidence base does not exist. A review of the limited evidence shows mixed results and much uncertainty of the impact of culture-led regeneration. Current evaluation measures are not appropriate for understanding the long-term and dynamic changes that regeneration schemes may cause and instead these schemes should be monitored, focusing on both people and places.
Shaping Neighbourhoods: Character and Context SPG (2014)	This guidance sets out an approach and process to help understand the character and context of a place so that its results can inform the planning and design process, and guide change in way which is responsive to individual places and locations. A separate non-technical summary sets out the main messages of the SPG. A supporting list of data and research resources is provided as a living document that will be updated as appropriate.
Streetscape Guidance: A guide to better London Streets (2009)	The Streetscape Guidance provides advice on improving and managing the Transport for London Road Network (TLRN) and promotes consistency of approach and excellence in design and workmanship. The document highlights relevant policies and guidance, sets out specific design principles and guidelines including a palette of materials and products, and acts as a best practice resource for London boroughs and other partners.
London View Management Framework	The London View Management Framework is a key component of the Mayor's strategy to preserve London's character and built heritage. It outlines the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.
Building for Life 2012	Building for Life 12 (BfL 12) is the industry standard for the design of new housing developments.
Housing 2016 (London Plan SPG)	This Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan ¹ and the 2016 Minor Alterations to the Plan (MALP). It replaces the 2012 Housing SPG.

Social Infrastructure 2015 (London Plan SPG)	This document contains guidance to support London Plan Policy 3.16 on the Protection and Enhancement of Social Infrastructure, as well as policies 3.17 Health and Social Care Facilities, 3.18 Education Facilities and 3.19 Sports Facilities. It particularly focuses on those elements of social infrastructure that face the biggest strategic challenges - specifically health, education, sport, faith and burials. It is anticipated that some of the approaches in this document will be refined once new provision models for health and education facilities have bedded in further.
Accessible London: Achieving an inclusive environment 2014 (London Plan SPG)	The Accessible London SPG provides advice to boroughs, developers, designers and planning applicants on implementing inclusive design principles effectively and on creating an accessible environment in London, with particular emphasis on the access requirements of disabled and older people.
Town Centres 2014 (London Plan SPG)	This SPG provides guidance on the implementation of London Plan Policy 2.15 Town Centres and of other policies in the Plan with specific reference to town centre development and management. It also provides guidance on Policy 2.16 Strategic Outer London Development Centres and their potential to be developed as business locations with distinct strengths of greater than sub regional importance. To support the policies in the London Plan this SPG includes guidance on: Supporting the evolution and diversification of town centres; Delivering mixed use housing intensification; Quality matters; Promoting Accessibility and Connectivity; Town centre regeneration and initiatives; Proactive town centre strategies; Strategic Outer London Development Centre implementation guidelines.
Character and Context 2014 (London Plan SPG)	This Supplementary Planning Guidance (SPG) sets out an approach to understanding character and context so that this evidence can help to guide change in the planning and design process in a way which is responsive to individual places and locations. It is key to the implementation of many of the policies in Chapter 7 of the London Plan, particularly Policies 7.4 and 7.1.
London Planning Statement 2014 (London Plan SPG)	Sets out general principles of fundamental importance to the planning system in London.
Preparing Borough Trees and Woodland Strategies 2013 (London Plan SPG)	This Tree and Woodland Strategy Supplementary Planning Guidance (SPG), prepared jointly with the Forestry Commission, gives guidance on the implementation of the London Plan Policy 7.21 to protect, maintain and enhance trees and woodland in London. It also takes forward the
Play and Informal Recreation 2012 (London Plan SPG)	This Supplementary Planning Guidance relates to the implementation of London Plan Policy 3.6, but also a range of policies on shaping neighbourhoods (see Chapter 7 of the London Plan). It provides the opportunity for more detailed guidance that cannot be covered in the Plan. It proposes benchmark standards that were developed for the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation in 2008, and in the light of consultation with London boroughs, play specialists and designers, builds on the experience of implementing that earlier guidance. The benchmark standards provided in this guidance are flexible enough to meet the varying needs of children and young people across London.

Planning for Equality and Diversity in London 2007 (London Plan SPG)	This SPG provides more detailed guidance on how to implement the key London Plan policies relating to addressing the needs of London's different communities, to ensure that implementation of the London Plan achieves the Mayor's vision. As context to this guidance, the SPG also highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination.
London's Economy Today 2016	Regular update on the state of London's economy. The report highlights key economic projections in relation to growth in employment sectors, increase in London's job market and implication for supply and demand for labour.
City for all Londoners – Mayor of London (consultation draft October 2016)	The Mayor Sets out in this consultation document (October 2016) the strategic ambitions and direction of travel across London. Some of the key economic messages are: ensuring provision for industrial and retail activity and promote viable locations for office space, consideration for surplus industrial land for housing alongside feasible options for industry and housing to coexist in certain locations and to support small and medium sized businesses by protecting existing workspace in new affordable locations.
London's Digital Economy (2012)	This report draws together a variety of data sources to highlight London's position in the digital arena. The report looks at uptake and use of digital technologies by businesses and households.
Retail in London: Looking forward (2015)	Through reading the main report you will: Find out how developments such as changing consumer behavior and technological advances have altered the playing field for London's retailers - See how retailers have adapted by implementing measures such as 'Click-and-Collect' or 'Dark Stores' - Gain an understanding of what these adaptations may mean for the role retail plays in London, ranging from the employment it provides to the land it uses.
Jobs and Growth Plan (London Enterprise Panel) 2014	It will help to deliver jobs and growth for London through: Skills and employment: to ensure Londoners have the skills to compete for and sustain London's jobs; Micro, small and medium sized enterprises: to support and grow London's businesses; Digital creative, science and technology: for the capital to be recognized globally as world leading hub; for science, technology and innovation - creating new jobs and growth; and Infrastructure: to keep London moving and functioning.
London Labour Market Projections (2013)	This report outlines GLA Economics' latest employment projections and shows that jobs in London are projected to grow by more than 850,000 by 2036. The report also provides future projections for both the occupations and qualifications of those employed in London. The report looks at the level of turnover in the labour market with the analysis suggesting that just over half a million people left their occupation in London in 2012. The report also considers the projected increase in London's population and considers the extent to which the demand for, and supply of, labour is likely to be in balance in the longer term.
Alcohol Consumption in the nighttime economy (2012)	The night-time economy (NTE) is activity which occurs between the hours of 6pm to 6am and involves the sale of alcohol for consumption on-trade (e.g. bars, pubs and restaurants). This work looks at the most effective ways to mitigate the costs associated with alcohol in the NTE. It is combined with a tool which estimates (currently measurable) pros and cons for each London Local Authority. The policy options assessed cover pricing, licensing, premise design and operations, public realm design, service interventions, and community mobilisation.
London's Super Connected City Plan (2012)	London's Super Connected City Plan is ambitious and innovative. It will underpin the capital's aspiration for contiguous ultrafast connectivity, provide the digital infrastructure needed for the new economy and help East London realise its full economic potential. Successful delivery of this plan will be critical to realising the Mayor of London's prime objective: economic growth for London, and job creation for Londoners.

Mayor's Economic Development Strategy (2010)	The Mayor's vision is for London to be the best big city in the world. The Economic Development Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.
Economic Evidence base (2010)	This document aims to provide an economic evidence base to support the three Mayoral strategies that have recently been revised (the London Plan, the Economic Development Strategy and the Transport Strategy).
GLA Employment Time Series (2010)	Historic and projected employment data by sector and borough. The objectives are: To provide a sectoral breakdown of both historic employment data and the latest GLA Economics employment projections for London to 2031 using at least the established 'RTP definitions' of Offices, Industry and Other and; To provide the sectoral breakdown above for all London Boroughs plus sub-totals showing the Central Activities Zone (CAZ), Isle of Dogs (IOD), rest of Inner London, Outer London and the sum Total for London.
London Office Policy	The London Office Policy Review is the most recent in a series of independent reviews of office market trends commissioned by the GLA. It includes robust Monitoring Benchmarks and associated time series data to illustrate key trends and market relationships and their bearing on
London Business Survey (2014)	The 2014 London Business Survey is an innovative survey designed by the Office for National Statistics, on behalf of the London Enterprise Panel and the GLA. The survey covers a wide range of topics including the profile of London business, their performance and outlook, workforce, trade, and London as a place to do business.
Land for Industry and Transport SPG (2012)	This draft document sets out proposed guidance to supplement the policies in the 2011 London Plan relating to land for industrial type activities and transport. The SPG provides advice on how to implement these policies, in particular Policy 2.17 on Strategic Industrial Locations, Policy 4.4 on Managing Industrial Land and Premises; and Policy 6.2 on Providing Public Transport Capacity and Safeguarding Land for Transport. Once adopted it will replace the 2004 Industrial Capacity SPG.
London Industrial Land Demand and Release Benchmarks, Roger Tym & Partners (2012)	The Industrial Land Demand and Release Benchmarks Study assesses future demand for industrial land across London and compares it with the current and planned supply. The aim of the study is to provide evidence to inform London-wide and local planning policy in order to ensure that London has the right quantity and quality of industrial land to support its economy and its population while using the land efficiently. Where there is evidence of an over-supply, the study estimates how much land may be released to other uses and makes recommendations for the management of surplus capacity.
Understanding the demand for and supply of visitor accommodation in London to 2036	GLA Economics was asked by the Greater London Authority (GLA) London Plan team to update work surrounding the demand for serviced visitor accommodation to see whether the existing London Plan benchmark target (Policy 4.5) for serviced rooms needed revising. The work was to also include an update around the accessibility of serviced visitor accommodation. The first part of this report examines the supply side of the London market. It sets out the best estimate of the current supply of serviced (and non -serviced) visitor accommodation in London. It also looks at the potential growth in supply of visitor accommodation over time (from focusing on the supply side only). The report then moves onto the demand side, illustrating how visitor nights in London have moved over time. It sets out how GLA Economics has gone about projecting visitor nights over time and its central projection for visitor nights. The report finishes with the projection for nights converted into the likely requirement for serviced visitor accommodation over time.

Accessible Hotels in London (2012)	This report was commissioned by Design for London (DfL)/London Development Agency (LDA) and Greater London Authority (GLA) to provide evidence to inform a new London Plan policy on the percentage of accessible hotel bedrooms required to meet demand now and over the next 20 years. A room which is 'accessible' is defined as one which minimises barriers to use for as many people as possible. It is a wider definition than a room being wheelchair accessible as it allows use by people with disabilities other than mobility impairments. Policy and planning requirements have previously been based around the definition of wheelchair accessibility, but this is now considered to be too narrow a definition of disability, as well as being based on an outdated medical model of disability.
Cornered shops: London's small shops and the planning system (2010) and addendum	This report looks at how the planning system, and other initiatives, can provide support for London's small shops and neighbourhood shopping areas. It seeks to identify the benefits of small, local and independent retailers to London; the evidence there is to show that they are under threat; the policies that have been proposed to support small shops; and what progress has been made in implementing them.
London's Retail Street Markets (June 2010)	This is a research report commissioned by the LDA. It provides a spatial and economic analysis of the retail street markets in London and identifies the area based issues facing these markets. The analysis also considers the contribution street markets can and are making to London's economy. The study has been used to inform the LDA (and the wider GLA group) what role they could have in supporting street markets. The study includes research on all types of London retail markets (such as clothing, arts, food etc) but exclude wholesale markets.
Managing the Night Time Economy PDF(March 2007)	This is one of a series of best practice guides issued by the Mayor to demonstrate how the broad policies of the London Plan can be implemented locally. This Best Practice Guide suggests how public authorities and the private and voluntary sectors can work together to support the development of the night time economy in appropriate locations and improve the way they manage its impacts.
London Town Centre Health Check (2013)	The 2013 London Town Centre Health Check is the latest in the ongoing series of strategic London-wide health checks undertaken by the Greater London Authority with support from the London boroughs. It provides a 'snapshot' of the health of over 200 of London's town centres using a selection of strategic health check indicators and illustrates how these have changed over time.
Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (2013)	Government policy in the National Planning Policy Framework requires the GLA and boroughs to assess the overall need for additional floorspace for economic uses, including retail and leisure development. This study assesses the scale and nature of consumer expenditure in London for comparison goods retail, convenience goods retail, and other expenditure including leisure over the period from 2011 to 2036. It focuses on strategic requirements for comparison goods retail floorspace need in London, distributed to boroughs and individual town centres. The project is both current and forward-looking, factoring in major retail pipeline developments in and around the capital and contains three additional scenarios to test alternative spatial patterns of growth and quality.
Accommodating Growth in Town Centres: Achieving	The 'Accommodating Growth in Town Centres' report assesses the changing nature of retail and the capacity and deliverability of housing intensification in and around town centres, while encouraging a diverse range of enterprises and the spaces they need on High Streets.
Artists Workspace Study: We made that (2014)	Study to better understand the picture of affordable studio provision for artists in London. The study is the first step in creating a list of all London's Artist Studios on the Mayor's 'London.Gov' website

Supporting Places of Work: incubators, accelerators and co-working spaces (2014)	The GLA appointed URS, Ramidus, #1Seed and Gort Scott to carry out research into the supply of existing Incubators, Accelerators and Co-working (IAC) spaces in London, which was the first study into the emerging sector of this kind. The report recommends the creation of a workspace provider network, through which IACs can inform emerging workspace policies, share learnings, and engage with boroughs and developers. The report also recommends the creation of an online interactive map to make IAC spaces visible to Londoners. The report concludes that any future public sector investment should focus on IACs with clear community outreach goals (e.g. providing training for disadvantaged groups, providing subsidised workspace) as well as being combined with wider initiatives to maximise public outcome.
Cross River Partnership business plan	Cross River Partnership (CRP) is a public-private partnership that was originally formed to deliver cross-river infrastructure projects such as the Millennium Bridge. CRP has since diversified to deliver a wide range of externally-funded, multi-partner regeneration projects.
Town Centres SPG (2014)	This SPG provides guidance on the implementation of London Plan Policy 2.15 Town Centres and of other policies in the Plan with specific reference to town centre development and management. It also provides guidance on Policy 2.16 Strategic Outer London Development Centres and their potential to be developed as business locations with distinct strengths of greater than sub regional importance. To support the policies in the London Plan this SPG includes guidance on: Supporting the evolution and diversification of town centres; Delivering mixed use housing intensification; Quality matters; Promoting Accessibility and Connectivity; Town centre regeneration and initiatives; Proactive town centre strategies; Strategic Outer London Development Centre implementation guidelines.
The Mayor's Action for High Street (2014)	It also outlines what the Mayor and his staff will do to help high streets, including how to diversify and grow and the support on offer from the Mayor's regeneration team. It makes the case for investment and how the Mayor will lobby to protect the future of London's high streets.
Delivering London's Energy Future: the Mayor's climate change mitigation	Delivering London's Energy Future is the Mayor's climate change mitigation and energy strategy. It sets out his strategic approach to limiting further climate change and securing a low carbon energy supply for London. To limit further climate change the Mayor has set a target to reduce London's CO2 emissions by 60 per cent of 1990 levels by 2025. Delivering London's Energy Future details the programmes and activities that are ongoing across London to achieve this.
Managing risks and increasing resilience:	Managing risks and increasing resilience is the Mayor's climate change adaptation strategy for London. It details his strategic approach to managing the climate risks we face now and in the future in order to maintain London as one of the best big cities in the world.
Climate Change Adaption Strategy for London (2010)	The Mayor's Climate Change Adaptation Strategy: <ul style="list-style-type: none"> - identifies who and what is most at risk today - analyses how climate change will change the risk of flood, drought and heatwave through the century - Describes what action is needed to manage this and who is responsible for it. The key actions proposed in the strategy are: <ul style="list-style-type: none"> • To improve our understanding and management of surface water flood risk • An urban greening programme to increase the quality and quantity of greenspace and vegetation in London – this will buffer us from floods and hot weather • To retro-fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes
Decentralised Energy Capacity Study (2011)	This publication is formed of three reports providing data on, and analysis of, the potential for renewable and low carbon energy in London. This regional assessment breaks down the types of energy that can contribute to the Mayor's target to supply 25 percent of London's energy from decentralised sources by 2025.

Thames Region Catchment Flood Management Plan,	This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. It is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. It takes into account the likely impacts of climate change and the plans for future development.
Regional Flood Risk Appraisal (2009)	In June 2007 the Mayor published the draft Regional Flood Risk Appraisal (RFRA) for the London Plan, for public consultation. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed.
Individual well-being in London (2014)	Over the past four years, the UK Government has sought to understand the subjective well-being of individuals as an alternative measure of the relative 'health' of a country compared to traditional measures such as GDP. This analysis presents findings for London and examines variations in how individuals assess their own well-being according to a number of different personal characteristics. Among those characteristics exhibiting the largest levels of variation in well-being are qualification level, health and disability status, along with some variation seen across different age and ethnic groups.
London Mental Health: The invisible costs of mental ill health (2014)	This report aims, where possible, to quantify the impact of mental ill health in London in order to highlight the scale of the problem. It does this through analysing the wider economic and social impacts of mental ill health. As such the measurement and quantification of the costs of mental ill health go beyond usual measures of economic output, or Gross Value Added (GVA) to consider, amongst other things, so-called 'non-market' impacts, for instance the impact on individuals' quality of life from mental ill health. The intention is for this to provide for a more 'all-encompassing' measure of the economic and social costs of mental ill health to London.
The London Health Inequalities Strategy (2010)	The London Health Inequalities Strategy sets out the Mayor's commitments to work with partners to: Promote effective parenting, early years development, young people's emotional health and readiness for learning; Motivate and enable Londoners to adopt healthier behaviours and engage in lifelong learning; Build knowledge about health and wellbeing, tackling stigma and taboo in the process; Promote community development approaches to improve health, and actively support the role of the third sector; Build public sector capacity to engage more effectively with individuals, communities and the Voluntary and Community Sector (VCS).
The London Health Inequalities Strategy: First Steps to Delivery (2012)	This 'First Steps to Delivery' plan sets out the actions prioritised to 2012 against the thirty high-level commitments which form the bedrock of the strategy.
The London Health Inequalities Strategy: Delivery Plan 2015-2018 (2015)	<ul style="list-style-type: none"> • sets out the overall approach the Greater London Authority (GLA) will take from 2015-2018 to tackle health inequalities • aligns the Mayor's response to the London Health Commission report Better Health for London (2014) with the Health Inequalities Strategy commitments • describes what role Health and Wellbeing Boards, Clinical Commissioning Groups, Public Health England, NHS England, local public health teams, and voluntary and community sector have in tackling health inequalities • develops a brief way of expressing health inequalities in London that elected members can understand and can be tracked over time • maps GLA actions and programmes to reduce health inequalities against the commitments of the Health Inequalities Strategy 2010

<p>Takeaways Toolkit: Tools, interventions and case studies to help local authorities develop a response to the health impacts of fast food takeaways (2012)</p>	<p>Takeaways may be good for London's economy, but they're often bad for Londoners' health. To help London boroughs balance the conflicting priorities and understand the options available when considering the health impacts of fast food, we've created a 'takeaways toolkit'. The toolkit has three main recommendations for boroughs:</p> <ul style="list-style-type: none"> - making food healthier – working with takeaway businesses and the food industry to make healthier fast food. - starting them young – schools should have strategies to reduce the amount of unhealthy food children eat at lunch and on their journey to and from school. - planning for health – use regulatory and planning measures to address the proliferation of hot food takeaway outlets.
<p>Health: Children and Young People (2010)</p>	<p>Health: Children and Young People is the second report in the Focus on London 2010 series. This chapter, authored by the London Health Observatory, provides recent evidence on the health experience of children and young people in London. The report includes data about the Local Index of Child Wellbeing, infant mortality, breastfeeding, immunisation, injury, childhood obesity, physical activity, diet, smoking, alcohol consumption, drug use, teenage conceptions and sexual health. It reveals many areas of inequality within the city, but also highlights the ways in which London's children are doing well.</p>
<p>A Sporting Future for London (2009)</p>	<p>This plan is about increasing participation in sport and physical activity. It aims to deliver a grass-roots sporting legacy for Londoners from the 2012 Olympic and Paralympic Games by:</p> <ul style="list-style-type: none"> • securing a sustained increase in participation in sport and physical activity amongst Londoners • using sport to assist in tackling social problems including ill health, crime, academic underachievement and lack of community cohesion.
<p>A Sporting Legacy for London (2011)</p>	<ul style="list-style-type: none"> • Successful sporting legacy would see increases in participation rates overall and among groups who are currently less likely to participate • Bridge the gap between the supply and demand for sporting facilities which varies across London • Focus of report on how successfully the Mayor was in providing strategic leadership on sports provision and funding and what effect this is having • Offers a number of recommendations for the future; develop a partnership approach to incorporating local health and education sectors, negotiate with LOCOG to broaden way the Olympic brand could be used to raise profile of work being done to increase participation, retain a role for Sports Commissioner and London Community Sports Board after 2012.
<p>Our Healthier South East London (2014)</p>	<p>Our Healthier South East London is a five year commissioning strategy which aims to improve health, reduce health inequalities and ensure all health services in south east London meet safety and quality standards consistently and are sustainable in the longer term.</p>
<p>NHS London: A Call to Action (2014)</p>	<p>This builds on NHS England's national Call to Action document published in July, which set out a case that the NHS must transform in order to continue to deliver the best care to those who need it.</p>
<p>Better Health for London: Next Steps (2015)</p>	<p>The Mayor of London, NHS England (London), Public Health England, London Councils and the 32 GP-led clinical commissioning groups have come together to outline how, individually and collaboratively, they will work towards London becoming the world's healthiest major city.</p>

English Heritage's Heritage at Risk-London	The Register identifies which heritage assets are at risk from development pressures, neglect or decay. It also monitors the changing condition of assets in order to help us prioritise where resources and expertise can best be deployed to resolve the problems. It also includes listed buildings and scheduled monuments, Conservation Areas, Registered Parks and gardens.
The National Heritage List for England	The Register identifies all registered heritage assets including listed buildings, scheduled monuments, protected wreck sites, registered parks and gardens, registered battlefields, world heritage sites, applications for certificates of immunity (COIs) and current building preservation notices (BPNs).
London World Heritage Sites - Guidance on Settings (2012)	The London Plan sets out policies to conserve and enhance London's World Heritage Sites and their settings, and states that the Mayor will produce guidance on defining the settings of London's World Heritage Sites. There are four World Heritage Sites and one potential site on the Tentative List in London.
Housing supplementary planning guidance (2016)	The SPG provides guidance on how to implement the housing policies in the 2016 London Plan. In particular, it provides detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighborhoods". It is informed by the Government's National Planning Policy Framework and by its Housing Strategy for England.
London Housing Strategy (2014)	The Mayor's strategy aims to put in place the resources to deliver more than 42,000 new homes a year, but achieving this ambition will require the full commitment of the London boroughs, of government, and of private and public sector developers. The Mayor believes that only by working together can we agree a long-term financial settlement with national government, free up local councils to build, promote institutional investment in new housing, bring forward surplus public land and develop Housing Zones across the capital to drive delivery. The strategy also aims to make sure that the homes we build better reward those who work hard to make this city a success – by massively increasing opportunities for home ownership, by improving the private rented sector and by ensuring working Londoners have priority for affordable homes to rent.
Housing in London (2014)	Housing in London is the evidence base for the Mayor's London Housing Strategy, summarising key patterns and trends across a wide range of topics relevant to housing in the capital.
GLA Housing Design Guide Interim edition (2010)	The new 'interim edition' of the London Housing Design Guide sets out the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.
Outer North East London Strategic Housing Market Assessment (2016)	The Outer North East London Strategic Housing Market Assessment (SHMA, 2016) provides an Objectively Assessed Need for the east London sub-region which includes the boroughs of Redbridge, Newham, Waltham Forest, Barking and Dagenham, Havering.

GLA 2015 Round Population Projections	Detailed ward level population projections to support the London Plan. Incorporating housing provision targets as outlined in the consultations draft of the revised London Plan
Barriers to Housing Delivery (Update 2014)	In 2012 The GLA asked Molior London to produce a report called 'Barriers to Housing Delivery in London'. The report's purpose, broadly, was to find out why developers in London were not building more homes for private-sale. The report's conclusion was, broadly, 'they are building more homes for private sale than you think'. Molior London was asked to update that report. This time the brief might be simplified as 'the stock of unbuilt private-sector planning permissions in London is significant –so why aren't we hitting housing delivery targets?'. This report's conclusion can be summarised as 'big schemes in London are commencing units in line with the numbers required to meet housing need'.
Mayor's Academic Forum Recommendations Paper – student housing (2014)	The Mayor's Academic Forum was established through the 2011 London Plan particularly to support implementation of Policy 3.8, which recognises that specialist student provision could give rise to concerns over: <ul style="list-style-type: none"> - the loss of capacity for conventional homes, especially affordable family housing; - the need to secure mixed and balanced communities; - the scope for identifying land suitable for student accommodation; and, - the way these issues are expressed in parts of inner London "where almost three quarters of the capacity for new student accommodation is concentrated".
London Infrastructure Plan 2050 Update (2015)	The document sets out what infrastructure London requires. It is the first ever strategic attempt to set out London's infrastructure needs, how much it might cost and how we pay for our needs. The aim is to prepare for, and benefit further from, London's growth: bringing fresh thinking into the city's infrastructure needs now, in order to meet them more costs effectively in the long term.
MOPAC/MPS Estates Strategy 2013-16	Linked to the Police and Crime Plan is the new MOPAC/MPS Estates Strategy 2013-16, see below. Following consultation on local policing and public access in January-March 2013, further work was undertaken to finalise plans for the wider police estate and the final version of this strategy is available below.
Central London Infrastructure Study (2009)	The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. In particular, as well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
Community Infrastructure Charging Schedule – Mayor of London (2012)	Sets out the level of charge that will apply to certain types of new development across London in order to deliver the Crossrail programme.

Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy – SPG (2016)	This SPG sets out guidance on implementation of London Plan policies on the funding of Crossrail, planning obligations and the Community Infrastructure Levy (CIL).
Social Infrastructure SPG (2015)	Social infrastructure includes a wide range of services and facilities, including health, education, community, cultural, play, recreation and sports facilities, faith, emergency facilities and many other local services and facilities that contribute to quality of life.
London Implementation Plan (2013)	The Implementation Plan is intended to: facilitate effective coordination and cooperation of activities to ensure the realisation of the London Plan; inform developers and all delivery partners who need to understand the envisaged implementation actions and strategic infrastructure provision in relation to the London Plan; provide communities with transparent and accessible information to enable them to get involved in the development of their area; help boroughs in terms of the wider context for their local implementation and infrastructure planning and the preparation for their Community Infrastructure Levy (CIL).
London Planning Statement (2014)	The NPPF revoked Government Office for London Circular 1/2008 which “provided advice and guidance on the arrangements for strategic planning in London”. The Mayor considers that it is helpful for him to fill the gap this leaves with a document that provides some information about his planning functions, and the way in which he intends to carry them out. This document is intended to be helpful to anyone concerned with planning in London, including boroughs, specialist agencies, developers, amenity and voluntary groups, individual neighbourhoods and Londoners. It: sets out some general principles of fundamental importance to the planning system in London; explains the Mayor’s part in London’s planning system, both in preparing strategic planning policy through his spatial development strategy (or “London Plan”) and in the taking of planning decisions about strategic developments; highlights the issues that the Mayor considers are particular priorities for the London planning system and which he thinks it is helpful to draw to the attention of others; and sets out the Mayor’s intended programme of planning-related work for the next four years.
London Agglomeration Noise Action Plan (2010)	The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.
Southern City: The Mayor’s Ambient	The aim of the Mayor’s ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework.
A Manifesto for Public Open Space: London’s Great Outdoors (2009)	London’s Great Outdoors recognises that investment in public space enhances the look and feel of the city, making it a more healthy and pleasant place for residents and visitors and an environment in which businesses can thrive. It contributes to maintaining and improving London’s image as the world’s most green and liveable big city and highlights London’s offer as a city that can sustain economic growth.

Open Spaces Strategies: Best Practice Guidance (2008)	This document provides guidance on how to create an open space strategy. Drawing on the lessons learnt from 5 years of CABE Space strategic enabling support with local authorities across England, it updates earlier CABE Space guidance, (Green space strategies: A good practice guide, 2004), and combines this with an update of the guidance for London, (Mayor's guide to preparing open space strategies; Best practice guidance of the London Plan, 2004), to provide one comprehensive guide for England.
Connecting with London's Nature. The Mayor's Biodiversity Strategy	The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is an important step in establishing a London-wide framework for maintaining London's diversity of wildlife.
Preparing Borough Tree and Woodland Strategies SPG (2013)	The Preparing Borough Tree and Woodland Strategies Supplementary Planning Guidance, a joint publication with the Forestry Commission, has been published. It sets out an approach to trees and woodland that: <ul style="list-style-type: none"> - Covers the audit, protection and management of trees and woodland in line with Policy 7.21 of the London Plan - Highlights the asset value of trees and woodland, both in financial terms and the broad range of economic and environmental benefits they provide - Considers all the trees in a borough as a single unified resource – an 'urban forest' - Extends the concept of an 'urban forest' across boundaries so that the cumulative benefits of trees to Londoners can be enhanced - Takes a step by step approach to the management of trees and woodland.
All London Green Grid SPG 2012	The SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	This SPG aims to help those involved in planning local neighbourhoods to engage with young Londoners to deliver real improvements in the quality of play spaces. The Mayor wants to see a child-friendly London with inclusive, accessible, and safe play spaces that allow all young Londoners to engage in fun, positive, and healthy play and recreation in their own communities and throughout London. The 2012 SPG adds further guidance to the previous 2008 SPG, in particular expanding on the concept of lifetime neighbourhoods.
London's Foundations SPG (2012)	London's Foundations (2009) was a joint publication with Natural England setting out London's geological heritage, explaining the process for identifying sites of national, regional and local geological importance, identifying important geological sites for protection and advising boroughs on
Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2014)	This SPG provides guidance on what measures developers can include in their building designs and operations to achieve the carbon dioxide and water consumption targets set out in the London Plan. It also provides guidance on how boroughs can take forward the new approaches set out in the London Plan, such as carbon-dioxide off-setting, retrofitting and 'air quality neutral'.
Mayor's Transport Strategy (2010)	The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision.

Land for Industry and Transport SPG (2012)	The SPG provides an update of previous Mayoral guidance, setting out how boroughs should make effective, efficient use of land for transport purposes.
River Action Plan (2013)	This plan outlines a number of specific measures to be taken by TfL and other stakeholders to help boost the number of river trips in line with achieving the Mayor's target of 12 million passenger journeys a year by 2020.
Cycling Revolution London (2010)	The Strategy sets out the vision and policies for encouraging and enabling more cycling across London. The strategy sets out an aspiration to increase cycling by 400% by 2026 through a range of initiatives including the delivery of a series of cycle superhighways, improved cycle safety and an increase training aimed at cyclists
The Mayor's Vision for Cycling	The Mayor's Vision for Cycling document sets out how this will be achieved, focusing on four key outcomes: 1. A Tube network for the bike. London will have a network of direct, joined-up cycle tracks, with many running in parallel with
An Electric Vehicle Delivery Plan for London	The EV Delivery Plan sets out a comprehensive strategy to stimulate the market for electric vehicles in London.
Your Accessible Transport Network (2014)	Mayor of London's commitment to make it easier for people to travel around London.
London's Wasted Resource: The Mayor's Municipal Waste Management Strategy	London's Wasted Resource sets out the Mayor's policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. This strategy also sets out how the Mayor, through the London Waste and Recycling Board, will help develop more waste management infrastructure in London.
Making Business Sense of Waste: The Mayor's Business Waste Management Strategy	Making Business Sense of Waste is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.
London Remade Demolition Protocol	This describes how demolition materials can be recovered with maximum value and how this can be provided as a high quality recycled material in new builds.
Securing London's Water Future (2011)	The draft London Water Strategy is intended to complement the plans and strategies of other organisations by presenting a London- specific view of managing water resources. At a time of decreasing supply and increasing demand for water we need to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water wastage to balance supply and demand for water, safeguard the environment and help tackle water affordability problems. It also sets out how the Mayor will help communities at risk of flooding to increase their resilience to flooding

Environment Agency Thames Estuary 2100	This document provides regional guidance on the predicted effects of climate change in relation to tidal flood risk
Thames River Basin Management Plan (February 2016)	The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) by 2009 to promote the concept of sustainable water management. Their aims are: To safeguard the sustainable use of water, To protect and restore the status of aquatic ecosystems, To improve aquatic environments by the reduction of hazardous substances, To reduce groundwater pollution; and To help mitigate the effects of flood and droughts
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities) 2015-	Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the likely impact on bills.
Water Resources Management Plan	Sets out how demand for water is balanced against the supply over the next 25-year period.
Our Plans for Water (Thames Water Utilities) 2015-2020	A five-year Plan which sets out proposals to maintain and improve services during the period 2015 to 2020.
Drought Plan (2013) (Thames Water Utilities)	The Drought Plan sets out the actions to take in the event of a drought to maintain essential supplies of water while protecting the environment.
Thames Corridor Catchment Abstraction	This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.
Sustainable Remediation Forum UK (SuRF- UK) (2010)	This document presents the first phase of work by the UK Sustainable Remediation Forum (SuRF-UK), which is a framework for assessing the sustainability of soil and groundwater remediation, and for incorporating sustainable development criteria in land contamination management strategies. It helps assessors to identify the optimum land and/or groundwater remediation strategy and/or technique.

LOCAL

Council Documents	
Joint Waste Plan (2012)	As the Local Plan is not likely to be merged with the JWP, any re-drafted document needs to align with adopted JWP or any ensuing revision.
SPGs – Altering & Extending Your Home, Advertisements, Shopfront Design	If the SPGs are intended to remain in place, any Local Plan should link to and align with them or subsequent iterations.
Authority Monitoring Reports	Annual bulletins across various subjects that provide baseline information regarding the benefits and progress of development in the Borough.
Article 4 Directions	Any revised Local Plan should be drafted so as to align with the Article 4 Directions in force in the Borough, these include: change of use to a small HMO, and removal of PD rights in three conservation areas (Woodgrange Estate, Durham Road, Romford Road)
District Heat Network Local Development Order	This LDO gives planning permission to energy companies to build or dig in certain areas on the network as long as they follow the rules set out in the Order. Any revised Local Plan should allow the order to take effect and be used appropriately.
Local Development Scheme (LDS)	Last updated September 2016, the LDS sets out an expected timetable for the various documents being produced by the Local Planning Authority.
Statement of Community Involvement (SCi)	Drafting and development of the Local Plan should be carried out in line with the published SCi (July 2015) to ensure the views of local people are taken into account.
Equalities and the LDF (2011)	This document examines the interactions between the Local Plan and equalities issues.
Newham Strategic Flood Risk Assessment (SFRA) – 2010, 2016/17 update pending	An SFRA ensures flood risk is taken into account in the plan-making process and in subsequent development. Newham's 2010 SFRA is in the process of being updated for 2016/17.
Surface Water Management Plan (SWMP)	The SWMP identifies Critical Drainage Areas and outlines the preferred surface water management strategy for the borough. In this context surface water flooding describes flooding from sewers, drains, groundwater, and runoff from land, small watercourses and ditches that occurs as a result of heavy rainfall
Draft Local Flood Risk Management Strategy	Under Section 9 of the Flood and Water Management Act 2010 Act, the Lead Local Flood Authority (LLFA) (in this case Newham Council) is required to develop, maintain and monitor a LFRMS for the borough. The strategy should address flood risk from surface water runoff, groundwater and small rivers, streams and ditches and respond to the challenge of managing flooding from these sources.
The Mayor's 'Resilience Agenda'	The Mayor of Newham's over-arching strategy is one of building resilience for the people of Newham. More information can be found at https://www.newham.gov.uk/Pages/Services/Resilience.aspx and in the document: Building Resilience -The Evidence Base (September 2013), and Making Resilience Happen - An Update on Delivery.
Corporate Plan 2010-13	Our Corporate Plan for 2010-13 sets out the key actions we will take between 2010 and 2013 to deliver our Sustainable Community Strategy, in line with your priorities to improve services for you. It also sets out how we will measure our success in delivering your priorities.

<u>Air Quality Action Plan 2003 + 2008 Progress Report</u>	This action plan is based on an Air Quality Review and Assessment. The review was a five-year project to measure air quality. It was followed by a Progress Report in 2008. The resulting Air Quality Management Areas are addressed, inter alia, in the Local Plan.
Newham Children's Trust Children and Young People's Plan 2015-18	We have developed the Newham Children's Trust Children and Young People's Plan 2015-18 (CYPP) to communicate how we will be moving forward over the next four years to improve outcomes for children and young people.
<u>Sustainable Community Strategy</u>	The Sustainable Community Strategy for 2012-2030 sets out our how the Council will deliver better and more comprehensive services to the residents of Newham through all its policies.
<u>Joint Mental Health Strategy</u>	Together with Newham's Health and Wellbeing Board and Newham Clinical Commissioning Group, we are committed to improving the wellbeing and outcomes for people with mental health problems. This strategy describes our commissioning priorities for mental health over the next five years.
Joint Strategic Needs Assessment (last published 2011/12, update expected 2016/17)	The JSNA is prepared by the Newham CCG (Clinical Commissioning Group) arm of the NHS. The JSNA fulfils the statutory responsibility of the Health and Wellbeing Board; it identifies the key health priorities in Newham to support and inform planning and commissioning decisions. It addresses how long people can expect to live, how healthy their life may be, and the quality of their lives. It also focuses on the health gap between those in the most and the least deprived areas of the borough.
NEIGHBOURING AUTHORITIES	
Local Plans of: LB Hackney, LB Redbridge, LB Barking & Dagenham, LB Greenwich, LB Waltham Forest, LB Tower Hamlets, London Legacy Development Corporation (LLDC)	Given the Duty to Co-operate on cross boundary issues, any Local Plan for Newham should be prepared in consultation with surrounding authorities to ensure strategic issues effecting the sustainability of development are addressed as comprehensively as possible. Any assessment of impacts should take into account the planning framework of neighbouring plan areas.
Lee Valley Regional Park Plan, Lee Valley Park Development Framework	As a regional park of importance to LB Newham and East London in general, the Local Plan and any assessment of impacts should also take into account the development objectives and strategy of the Lee Valley Regional Park Authority (LVRPA)

Appendix 2 – Scoping Responses

Ms Elizabeth Botfield
London Borough of Newham

Our ref: NE/2006/000060/CS-
03/IS1-L01

localplan@newham.gov.uk

Date: 5 December 2016

Dear Ms Botfield

Local Plan Review: Integrated Impact Assessment (IIA) Scoping Report

Thank you for consulting us on the above policy document.

In general we are supportive of this document and are satisfied that all of the key significant environmental issues have been identified. We do have comments and recommendations to make on the document which can be found below under a number of headings.

Flood Risk and Climate Change

The Local Plan will need to identify the risks of flooding to the borough and set out a commitment on how it will be managed and reduced.

Please note that new guidance on how climate change could affect flood risk to new development has recently been published on the gov.uk website. 'Flood risk assessments: [climate change allowances](#)' replaces the previous guidance ([climate change allowances for planners](#)).

There is now a range of scenarios for peak river flow which replace the previous 20% allowance to reflect catchment characteristics within each river basin district. There is also a small change to peak rainfall allowances, where a range of allowances is provided at a national scale. The new allowances will need to be incorporated into any site specific Flood Risk Assessment (FRA).

Please note that the new allowances for peak river flow do not apply to the Tidal River Thames and developments here should continue to follow the actions within the Thames Estuary 2100 plan (TE2100 plan)
<https://www.gov.uk/government/collections/thames-estuary-2100>

Table 4: Objectives

11: Suggested amendment to the heading - To ~~minimise~~ and reduce flood risk.

A detailed objective should be included to reflect the wording of the National Planning Policy Framework (NPPF) paragraph 100 'using opportunities offered by new development to reduce the causes and impacts of flooding'. In addition to this we would also like to request an additional sub criteria to incorporate the aims of the sequential approach within the Technical Guide to the NPPF: 'Will it ensure that development is steered to areas at lowest risk of flooding?'

Cont/d..



Appendix 1: EU Directive

Water Framework Directive (2000/60/EC). This paragraph should be updated to reflect the current WFD management cycle.

Appendix 1: Regional

The *Thames River Basin Management Plan (2009)* has been superseded. The updated RBMP was published in February 2016 on the gov.uk website and sets out the progress made since the 2009 plan, the current state of the water environment and the programme of actions and measures to improve the water environment.

The new RBMP should be considered when preparing the Local Plan, particularly in matters such as flood risk, biodiversity and water quality.

For further details on the current status of waterbodies in this area please consult the online [Catchment Data Explorer](#).

I hope the above comments are useful in shaping your Integrated Impact Assessment (IIA). If you would like to discuss anything further please contact me on the details below.

Yours sincerely

Mr Andy Goymer
Planning Advisor

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9th December 2016

Dear Ms Botfield,

**Integrated Impact Assessment Scoping Report – Local Plan Review Consultation Draft
– October 2016**

Thank you for consulting Historic England on the Integrated Impact Assessment (IIA) Scoping Report for the Local Plan review.

Historic England is the Government’s adviser on the historic environment. We believe it is important to ensure the protection of the historic environment is fully taken into account at all stages and levels of the development plan process through active and continuous engagement.

It should be noted that our comments are provided in the context of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and Historic England’s Good Practice Advice (GPA) notes, specifically in relation to Local Plans (GPA1) and our guidance on Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (web link - <https://historicengland.org.uk/images-books/publications/strategic-envirn-assessment-sustainability-appraisal-historic-environment/>).



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Correspondence or information which you send us may therefore become publicly available.

Our headline comments on the IIA Scoping Report are set out below:

Borough Portrait – The detail provided appears to focus on statistical information about the Borough with very little commentary provided on the qualitative characteristics. We would expect to see in the Profile reference to the extent and diversity of the Borough’s heritage assets, and their contribution to the overall characteristics of the Borough. This could include quantitative evidence such as the number of heritage assets by type and grade; and their condition as captured by Historic England’s Heritage at Risk Register (e.g. 11 listed buildings at Risk (2016)).

Identifying Local Sustainability Issues – We would suggest that heritage management issues should be identified as an explicit sustainability issue and not implied or embedded in other issues. National policy (as set by the National Planning Policy Framework – NPPF) clearly identifies the historic environment as a core planning principle which contributes to the environmental dimension of achieving sustainable development. Focusing on Newham, the Borough has 11 listed buildings on the Heritage at Risk Register; experiences pressure for development and change, which can have an impact and potentially cause ‘harm’ to the significance of heritage assets; and areas of unknown heritage interest, which could benefit from further understanding and incorporation in to future management tools.

Developing the IIA Framework – In general we welcome the objective covering heritage issues and the question posed to test the emerging development plan. However to ensure alignment with the NPPF and its concepts and language, we would suggest that an additional question is inserted which asks:

Will it conserve and enhance the significance of heritage assets and their settings?

Compatibility of objectives – We note that only two other objectives are considered to be compatible with no. 13 (heritage). We would suggest others are also compatible, such as no. 5 (foster sustainable economic growth) and no. 12 (habitats and biodiversity) amongst others.

Appendix 1 – Relevant Plans, Policies and Programmes - The review of the plans, programmes and policies should consider the most up to date versions, which will have a direct bearing on the historic environment. For example Historic England has updated the Tall Building guidance in December 2015 as Historic England Advice Note 4. In addition to those identified we Historic England’s have released a series of Good Practice Advice notes, which incorporate some of the documents listed.

[\(https://historicengland.org.uk/advice/planning/planning-system/\)](https://historicengland.org.uk/advice/planning/planning-system/)

Overall it is important that the review draws out the implications for developing the IIA objectives; and for the development plan and other types of plan. In addition it is also useful to incorporate within the main body of the report a summary of the review and its implications. It is noted that at present there is just a list of documents with a brief summary of the resource.



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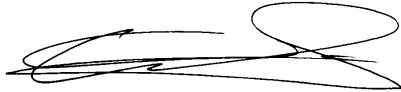
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We would like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where Historic England consider it appropriate to do so.

In the meantime, once you have considered the details of our response, I would be happy to meet to discuss further on how this important documents can be amended to reflect our comments and subsequently be implemented. With this in mind please do not hesitate to contact me.

Yours faithfully,



Graham Saunders
Principal Adviser - Historic Environment Planning - London



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Date: 02 December 2016
Our ref: 200303



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BY EMAIL ONLY

T 0300 060 3900

Dear Ms Botfield,

Planning consultation: Newham Local Plan - Local Plan Review Integrated Impact Assessment (IIA) Scoping Report
Location: London Borough of Newham

Thank you for your consultation on the above dated 31 October 2016 which was received by Natural England on 31 October 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Environmental Assessment of Plans and Programmes Regulations 2004
Wildlife And Countryside Act 1981 (As Amended)**

IIA Scoping Report

Generally the themes set out within the scope of the forthcoming full IIA report are those which Natural England would expect to see within such a document.

Natural England has not however reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- Shoreline management plans
- Coastal access plans
- River basin management plans
- AONB and National Park management plans.
- Relevant landscape plans and strategies.

As set out in [Planning Practice Guidance](#), you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Green infrastructure:

- Percentage of the boroughs population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Piotr Behnke on 0208 026 3893. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Piotr Behnke
Thames Team
Sustainable Development

Appendix 3 – Thematic IIAs

Spatial Strategy & Strategic Framework

This thematic IIA covers policies S1 Spatial Strategy and Strategic Framework, S2 Stratford and West Ham, S3 Royal Docks, S4 Canning Town and Custom House, S5 Beckton and S6 Urban Newham. For the full copy of these policies please refer to the *Proposed Submission Draft Local Plan*, available at www.newham.gov.uk/planningconsultations

Summary Assessment

Proposed policies are likely to have overall positive effects (direct or indirect) in relation to a range of IIA objectives including those related to successful inclusive neighbourhoods, accessibility and efficient use of buildings and land. They also do not preclude the realisation of other policies that more directly address other objectives. Any areas where proposed requirements might be expected to have possible negative effects in relation to other objectives are already mitigated by the carrying through of well-established Local Plan policies and processes such as Pre-application advice. These have been summarised below to ensure continuity within the plan review process. Monitoring of impacts and review of policies as necessary will continue to be important.

Mitigation/positive impacts contingent on

- Delivery of strategic allocations in line with spatial and other detailed policy considerations
- Securing affordable housing, appropriate infrastructure and a good mix of uses and housing types from all new development.
- Appropriate and timely investment in infrastructure, with the IDP as starting point
- Development viability/ negotiation of contributions

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty and promote equality of opportunity	Policy amendments seek to strengthen the principle of 'good growth' (S1) through a balanced approach to development. Delivery of strategic sites (S2, S3, S4, S5, S6) will reduce poverty and promote equality by delivering much needed housing, including optimising levels of affordable housing and family housing; jobs through new economic uses as well as Workplace promotion; and improved access to infrastructure and services, including new transport links allowing people to access wider opportunities.	Securing affordable housing, appropriate infrastructure and a good mix of uses and housing types from new development. Effective S106 negotiations.
2. To support healthier lifestyles	The new strategy promotes a step-change towards sustainable transport, supported by delivery of new key connections for walking/cycling/public transport (S1, S2, S3, S4, S5, S6), and a permeability standard (see policy INF2). The updated spatial strategy includes allocation for health, education and leisure facilities through non-strategic allocations (see policy INF8) and as part of specific strategic site allocations (S2, S3, S4, S5, S6). Delivery of new open and green spaces (S1, S2, S3, S4, S5, S6, INF7) and activation/enhancement of existing poor quality spaces (S1, S2, S3, S4, S5, S6), as part of development benefits, will increase access to quality open space, promoting healthier lifestyles.	Delivery of allocations in line with their stated parameters and other policy principles/targets.
3. To create successful neighbourhoods	Strategic sites (S2, S3, S4, S5, S6) will bring about a step change in regeneration of local areas, steering development to where there is greatest capacity to absorb change and setting out the principles and specifics needed to maximise the benefits of development. Integration and coherence through masterplanned comprehensive development is essential.	Successful application of all policies. Delivery of infrastructure. Comprehensive development through masterplanning.
4. To ensure people have access to a choice of good quality housing that meets their needs	New strategic site allocations (S1, S2, S3, S4, S5, S6) ensure the Local Plan continues to provide sufficient land supply to deliver the homes that meet need, and that they are delivered in appropriate locations with good access to jobs, services, open space etc. Further homes will come forward on smaller non-strategic sites (see policy H1).	Delivery of allocations in line with H policies/viability of development.
5. To foster sustainable economic growth	Revised spatial strategy strengthens the principle of 'homes not at the expense of jobs' (S1), an essential aspect of delivering good growth. Taking a plan-led approach to release of employment land, based on sound up-to-date evidence (Employment Land Review 2017), and ensuring that new housing development is mindful of transitional spaces, ensures that businesses can have the confidence to invest long-term in the borough.	Application of policy principles for good growth. Managed release of employment land. Management of spatial transitions between contrasting uses through masterplanning.

6. To ensure inclusive access to a range of high-quality community facilities and open space	To be achieved primarily through allocations for community facilities as part of strategic sites (S2, S3, S4, S5, S6) and non-strategic sites (INF8), based on engagement with providers and evidence of need (Infrastructure Delivery Plan 2017). Protection of further green spaces and promotion of delivery of new open and green spaces as part of strategic sites (S1, S2, S3, S4, S5, S6). Inclusive access is an important principle of existing policies that will continue to be applied.	Delivery of allocations in line with SP and INF policies. Viability. Innovative design to overcome site constraints.
7. To promote resource-efficient development, design and construction	The revised spatial strategy (S1) reinforces the need to integrate sustainable design, technologies and management techniques into all new development.	Application of SC policies. Viability.
8. To improve air and water quality	Spatial strategy supports delivery of additional public transport improvements and new and improved walking and cycling environments that amount to a step change in transport way from the car (S1, S2, S3, S4, S5, S6); also supported by allocation of development in accessible locations. Further managed release of industrial land and investment into the quality of remaining employment hubs (S1, S2, S3, S4, S5, S6), will equate to decontamination/more environmentally-friendly business operations, investment in quality of environment, and improved access to water along docks and rivers. Development is expected through existing policy to mitigate any negative impact on SINCs and their biodiversity/ecosystems, including rivers.	Application of SP/INF/SC policies.
9. To increase the proportion of journeys made by sustainable modes of transport	Spatial strategy supports delivery of additional public transport improvements and new and improved walking and cycling environments that amount to a step change in transport way from the car (S1, S2, S3, S4, S5, S6); also supported by allocation of development in accessible locations (S2, S3, S4, S5, S6).	Application of INF/SP policies. Delivery of transport infrastructure, including additional capacity.
10. To minimise the production of waste across all sectors and promote the proximity principle	The revised spatial strategy (S1) reinforces the need to integrate sustainable design, technologies and management techniques into all new development. This promotes resource efficiency and reduced waste production.	Application of SC/INF policies
11. To minimise and reduce flood risk	Development in flood-risk areas will deliver improved flood defences, including SUDS (S2, S3, S4, S5, S6).	Application of SC3 policy
12. To enhance and protect existing habitats and biodiversity	Objective supported through promotion of further green spaces (S1, S2, S3, S4, S5, S6), delivering additional habitats to create a connected network, and through decontamination of land, improvements in air/water quality.	Protection of existing habitats through implementation of policies SC4, INF6, INF7.
13. To enhance character, protecting, conserving and	Spatial strategy directs development to areas most capable of absorbing change and delivering added value (S1, S2, S3, S4, S5, S6). Policies will also ensure that adjacent heritage assets are enhanced and integrated as part of development, helping to bring back into use valued buildings, and supporting area regeneration through enhanced urban	Delivery of site allocations. Application of SP policies.

enhancing heritage and other character assets	environment/heritage setting. Development is also expected to correct past mistakes, enhancing townscapes where the current character is poor quality.	
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Successful Places

For the full detail of draft policy appraised here please refer to the relevant section of the Proposed Submission Draft Local Plan (November 2017), available at www.newham.gov.uk/planningconsultations

This thematic IIA covers policies SP1 Borough-wide Place-making, SP2 Healthy Neighbourhoods, SP3 Quality Urban Design within Places, SP4 Tall Buildings, SP5 Heritage and other Successful Place-making Assets, SP5a Areas of Townscape Value and Archaeological Priority Areas, SP6 Successful Town and Local Centres, SP7 Quality Movement Corridors and Linear Gateways, SP8 Ensuring Neighbourly Development, and SP9 Cumulative Impact.

Summary Assessment

Successful Places policies in the Core Strategy and Detailed Sites & Policies DPD were previously appraised as having a positive effect overall on IIA objectives, particularly those relating to health and the environment. Assessment of policy revisions proposed in this review of the Local Plan repeat this conclusion with no negative effects identified. The nature and importance of the expected effects of proposed changes are set out below along with examples of mitigation measures that may be needed in certain instances. As these mitigation measures have been drafted in to the policy, no overall negative effects have been identified.

For context, draft policies within the Successful Places theme focus on three main actions:

1. Continuing to emphasise high standards of place-making and urban design with particular reference to town centres and public health, ensuring all components are adequately specified and work in concert with spatial policies and associated site allocations.
2. Examining the appropriateness of the tall buildings policy, ensuring it is compatible with development realities while achieving the strategic intent of the policy and wider spatial vision.
3. Reviewing all other policies to ensure they are up-to-date, focussed, concise and comprehensive in light of the issues above.

Positive impacts are contingent upon:

- Activation of local jobs and convergence initiatives as expressed in J policies and S1
- Implementation of existing Local Plan policies for Successful Places: SP1 Borough-wide Place-making, SP2 Healthy Neighbourhoods, SP3 Quality Urban Design within Places, SP4 Tall Buildings, SP5 Heritage and other Successful Place-making Assets, SP5a Areas of Townscape Value, SP6 Successful Town

and Local Centres, SP7 Quality Movement Corridors and Linear Gateways, SP8 Ensuring Neighbourly Development, SP9 Realising Cumulative Impact and SP10 Managing Cumulative Impact;

- Implementation of policies H1 (Building Sustainable Mixed Communities), SC4 (Biodiversity) and INF1 (Strategic Transport)

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty and promote equality of opportunity	<p>Policy provisions pertaining to the enhancement of town centres (SP6), development of night-time economy (SP6), designation of new key corridors (SP7), place-making (SP1) and appropriate siting of tall buildings (SP4) are expected to contribute to the broader regeneration agenda, helping to stimulate investment, economic development and employment growth which in turn should help to reduce poverty if local jobs policies that seek to secure contributions to convergence are implemented. I.e. development ‘naturally’ and directly provides job and training opportunities for local people.</p> <p>Explicit reference to play space and informal recreation for young people (SP3) should ensure that the needs of this equalities group are given more consideration.</p> <p>No element in the draft policy would be expected to worsen poverty or limit equality of opportunity.</p>	Successful implementation of local jobs and convergence initiatives including Local Plan (policies S1, J1 and J4).
2. To support healthier lifestyles	<p>The draft policy concerning play space (SP3), trees and woodland (SP5), design testing (SP3 and SP4) for all developments, secure by design (SP3), should help to strengthen the healthy neighbourhood policy (SP2) contributing to the creation of higher quality physical environments which will benefit the health and well-being of the borough’s residents.</p> <p>No element in the draft policy would be expected to harm human health or restrict the pursuit of healthier lifestyles.</p>	Successful implementation of local jobs and convergence initiatives including Local Plan (policies S1, J1 and J4) especially Policy SP2 ‘Healthy Neighbourhoods’
3. To create successful neighbourhoods	<p>The draft policy including design testing for all developments (SP3 and SP4), secure by design (SP3), introduction of the agent of change principle (SP8), and guidance on tall buildings (SP4) aim to add further detail to assist in the achievement of successful neighbourhoods and place-making (SP1) by strengthening, elaborating and clarifying existing policy to more comprehensively address threats and opportunities.</p> <p>No element in the draft policy would be expected to restrict or limit key elements of the Successful Places policies.</p>	Successful implementation of local jobs and convergence initiatives (policies S1, J1 and J4) including Local Plan policies for Successful Places SP1
4. To ensure people have access to a choice of good quality housing that meets their needs	<p>The draft policy including design testing for all developments (SP3 and SP4), secure by design (SP3), introduction of the agent of change principle (SP8), neighbourliness (SP8) and guidance on tall buildings (SP4) seek to facilitate genuine housing options by raising design standards across the board increasing real choice.</p> <p>No element in the draft policy should preclude the realisation of existing policies promoting this objective.</p>	Successful implementation of local jobs and convergence initiatives including Local Plan policies (policies S1, J1 and J4) for Successful

		Places (SP1) and Housing (H1)
5. To foster sustainable economic growth	The draft policy pertaining to place-making (SP1), appropriate location of tall buildings (SP1 and SP4), support for town centres (SP6), and designation of new key corridors (SP7) should result in overall improvements to the quality of the business environment in the borough thereby supporting economic activity.	Successful implementation of local jobs and convergence initiatives including Local Plan policies for Jobs, Business and Skills (policies S1, J1 and J4).
6. To ensure inclusive access to a range of high-quality community facilities and open space	The draft policy includes proposals to secure children’s play space and recreational space for young people in large developments and at regeneration schemes (SP3). The draft policy also includes expansion of existing policy to protect existing trees and woodland and promote new green infrastructure (SP5). Both initiatives would support this objective as will emphasis on good, inclusive design (SP3). No element of the draft policy is likely to limit access to community facilities and outdoor space or preclude the realisation of existing policies designed to promote this.	Successful implementation of convergence initiatives including Local Plan(policies S1, J1 and J4).
7. To promote resource-efficient development, design and construction	Draft policy on tall buildings (SP4)seeks to clarify support for more efficient high density design that makes best use of public transport accessibility. In addition design testing for all developments (SP3 and SP4) and the introduction of the agent of change principle (SP8), will further support this objective.	Successful implementation of convergence initiatives (policies S1, J1 and J4) including Local Plan policies for Successful Places (SP1).
8. To improve air and water quality	Draft policy should not preclude the implementation of existing policies designed to control pollution.	Nothing identified
9. To increase the proportion of journeys made by sustainable modes of transport	Draft policy in relation to tall buildings (SP4) emphasise appropriate location with regard to public transport. Similarly, the emphasis on town centre quality (SP6) and designation of further key movement corridors and linear gateways (SP7) in the review of policy will include a focus on sustainable transport and accessibility. No element in the draft policy is likely to limit access to sustainable modes.	Successful operation of London regional transport system and implementation of forward planning including Local Plan policies (INF1 and INF2) for Infrastructure (Transport)
10. To minimise the production of waste	Draft policy should not preclude the implementation of existing policies designed to implement sustainable waste management.	Nothing identified

across all sectors and promote the proximity principle		
11. To minimise and reduce flood risk	Draft policy should not preclude the implementation of existing policies addressing flood risk.	Nothing identified.
12. To enhance and protect existing habitats and biodiversity	<p>Draft policy includes the more explicit protection and promotion of trees and woodland (SP5) which if implemented will extend and diversify the range of habitats in the borough and by doing so will support biodiversity. Policy requirements regarding promotion of children’s play space (SP3) may also offer opportunities for landscaping to assist biodiversity.</p> <p>Removal of access to nature deficiency cumulative impact zones (SP9) has no net impact due to the provisions of SC4 and INF6, which promote general access to nature through advancement of biodiversity gain and the green grid concept. This is more relevant than promoting proximity to SINCS, the biodiversity of which may indeed be detrimentally affected by disturbance from public access.</p>	Successful implementation of Local Plan policy SC4 (Biodiversity)
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Draft policy in relation to the location of tall buildings (SP4) will emphasise protection of heritage assets in the borough and their setting. Similarly the requirement relating to trees and woodland (SP5) has the capacity to significantly enhance setting of heritage assets. The emphasis in draft policy on design testing for all developments and realising design quality (SP3 and SP4) will benefit heritage assets when the subject of re-development proposals.	Successful implementation of Local Plan policies for Successful Places including SP1 (Place-making) and SP5 (Heritage and other Successful Place-making Assets)

Jobs, Business & Skills

The thematic IIA covers policies J1 – Business and Jobs Growth, J2 - Providing Efficient Use of Employment Land and J3 – Skills and Access to Employment. For the full detail of proposed policies appraised here (J1-J3) please refer to the Proposed Submission Draft Local Plan (November 2017) available to view at www.newham.gov.uk/planningconsultations

Summary Assessment

The draft policies seek to add to policies that create the conditions to attract investment in the Borough to allow Newham to act as a leading place within London for new and expanding companies to locate and invest so that it will play an important role in driving London economic growth. Whilst some changes promoted (notably employment land release) will be challenging in the short term, the overall strategic effect on IIA objectives when managed through the suite of development plan policies should be positive or neutral. These have been summarised below to ensure continuity within the plan review process. Monitoring of impacts and review of policies as necessary will continue to be important.

Mitigation/positive impacts contingent on

- Managed release and transition policies
- Promotion of wharf activation for freight purposes
- Site allocations on release sites that are cognisant of the needs of neighbouring, remaining employment generating uses
- Policies managing the environmental and neighbourly impacts of economic development
- Activation of other design, sustainable design, housing quality and successful places policies to for instance, minimise construction and demolition waste impacts and secure successful integration of employment-generating and other types of development.

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty and promote equality of opportunity	<p>The draft policies seek to foster economic growth and thereby job creation and poverty reduction by the protection of employment land (SIL, LIL, LMUAs), promotion of investment in growth sectors (J1), ambitious local jobs targets (J3) and procurement policies, and promotion of investment in mixed use areas that can support modern business environments. This should all enhance the impact of existing Jobs policies. Employment land release (J2) may result in some loss of business space, but managed transition and release policies seek to mitigate the impact of this and overall it would be expected to be more than compensated for by new employment-generating opportunities and investment brought about on mixed use sites.</p> <p>Overall the draft policies seek to support economic development across the borough, improving personal and economic resilience. Local jobs targets and procurement policies explicitly work to enhance equality of opportunity.</p>	Adding to existing jobs policies; managed transition and release policies (J1-J3)
2. To support healthier lifestyles	No direct impacts on this objective are identified, however the draft policies seek to enhance economic opportunities for all which provide positive impacts on overall health and wellbeing and policies encourage the development of modern business space which should have lesser impacts on the environment and hence health. None of the draft policies would preclude the implementation of the healthy neighbourhoods policy.	Implementation of design policies particularly healthy neighbourhoods.
3. To create successful neighbourhoods	A key component of successful places is ensuring people have access to employment and can enjoy their neighbourhoods including town centres (INF5, SP6), which the draft policy seek to enhance. Less positive impacts of the night-time economy and other aspects of economic development would be managed by existing policies concerning cumulative impacts (SP9) and neighbourly development (SP8) and design integration, working in concert with context-sensitive site allocations.	Design, C.I. / neighbourly development policies & site allocations that manage the negative impacts of economic development and are sensitive to local contexts.
4. To ensure people have access to a choice of good quality housing that meets their needs	The draft policies allow for managed release of employment land (J2) to contribute to mixed use redevelopment opportunities, including for housing; draft policies would not prevent the realisation of this objective through the application of other policies. Existing housing quality policy, plus site allocation specifications and neighbourly development policy would ensure compatibility with remaining employment land.	Site allocation specifications and neighbourly development & housing quality policy
5. To foster sustainable economic growth	Draft policies seek to foster sustainable economic growth and develop the borough as an attractive place to invest, improve people's employability and to provide a more efficient use of employment land to support growth sectors across Newham. Spatially the policies support town centre activity (INF5), recognise sites with good access to support employment generating uses and the infrastructure to attract investment within Newham.	Adding to existing J policies to better secure opportunities for economic growth.
6. To ensure inclusive access to a range of	The draft policy gives more positive support to the night-time and cultural economy (J1), which can had to the range of community facilities in an area. Other than this, draft policies does not explicitly deal with community infrastructure	Mixed use allocations and community

high-quality community facilities and open space	and open space, through employment land release decisions have been informed by consideration of whether these are adequate for employees, and would perhaps be better addressed through mixed use redevelopment that benefits both employees and residents	infrastructure policies
7. To promote resource-efficient development, design and construction	Employment land release decisions identified seek to make more efficient use of land (J2), and would enable, through the application of existing policies, more resource-efficient buildings to be built. Construction and demolition waste may be generated in land clearance, but implementation of waste management policies, including the new policy concerning Site Waste Management Plans should encourage reuse and recycling (INF3) The draft policy does not inhibit the realisation of other policies seeking to secure resource efficiency. Local procurement policies should help minimise the distances travelled by project resources.	Application of waste policies including those related to demolition and construction activities
8. To improve air and water quality	None of the draft policies specifically address water quality; however the transition to lighter and greener forms of employment generation on employment sites will contribute to overall air quality objectives which will be locally improved. In retaining and promoting employment land in accessible locations will also improve peoples' travel to work distances and opportunities to keep travel distances low and associated low emissions. Proposals to continue to protect employment land (J2) backing protected wharves would enable uses currently dependant on road freight (e.g. concrete batching) to transfer at least some to river transport, with significant air quality benefits. This should also be a benefit of local procurement policies (albeit it may not be local air quality that benefits).	Implementation of design and sustainability policies. Promotion of wharf activation
9. To increase the proportion of journeys made by sustainable modes of transport	Through the protection and promotion of local employment (J2), more sustainable modes of transport can be accessed and promoted. Release of employment land for mixed use redevelopment in locations well served by DLR stations etc. should help promote better use of these modes. The promotion of employment on areas (including night time and cultural and tourism uses) that are highly accessible (e.g. town centres) by public transport sites would seek to improve the proportion of trips made by public transport (INF2) and support this objective and economic growth for the borough.	Application of transport policies INF1 and INF2 including measures to support sustainable travel.
10. To minimise the production of waste across all sectors and promote the proximity principle	The draft policy continues to protect local sites in waste management use and protect employment areas where other such uses could be accommodated, albeit reducing the area of search due to proposed release. Some land clearance may result in construction and demolition waste, but existing policies and proposed enhancement should mitigate this, promoting re-use and recycling (INF3, SC1). Draft policies would not fetter the application of policies seeking to realise this objective.	Application of waste policies including proposed draft policy concerning Site Waste Management Plans
11. To minimise and reduce flood risk	Draft policy does not explicitly deal with flood risk (SC3) considerations, though encouragement of redevelopment in some areas enables the application of policies concerned with it to produce more resilient places.	Implementation of design and sustainability policies, particularly flood risk (SC3)
12. To enhance and protect existing habitats and biodiversity	Employment land release may result in loss of some brownfield habitats where vacant land prevails, but this would be dealt with by existing biodiversity policies (SC1, SC4). Redevelopment also brings the opportunity to enhance biodiversity. The draft policy does not inhibit the realisation of policies that secure biodiversity protection and enhancement. As per the methodology of the Core Strategy HRA it is concluded that no pathways of impact leading to likely significant effects on any European sites will be created through the additional policies	Implementation of existing biodiversity policies (SC 4)

<p>13. To enhance character, protecting, conserving and enhancing heritage and other character assets</p>	<p>New LMUAs promote development opportunities which work with the existing grain/character of a place to slowly effect positive change. Employment land release close to stations should promote enhancement of these assets through associated masterplanning. Draft policies do not inhibit the realisation of heritage and character asset conservation, protection and enhancement policies, and promotion of night time economy/cultural uses may help activate such assets with viable uses.</p>	<p>Application of SP policies will ensure high quality design supporting successful places</p>
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Homes

This thematic IIA covers policies H1 - Building Sustainable Mixed Communities, H2 - Affordable Housing, H3 - Specialist Accommodation Needs, and H4 - Protecting & Re-shaping the Existing Housing Stock. For the full copy of these policies refer to the *Proposed Submission Draft Local Plan*, available at www.newham.gov.uk/planningconsultations

Summary Assessment

Taking into account the significant levels of housing growth likely to come forward in Newham throughout the plan period, the draft policies seeks to bolster existing policies that aim to deliver a continuing supply of a mix of homes of to meet the needs of Newham's population, acting in concert with quality and sustainable design and transport policies to promote community resilience and the creation of environments where people choose to live, work and stay. As such, the overall strategic effect on IIA objectives when managed through the suite of existing and proposed development plan policies should be positive or neutral. These have been summarised below to ensure continuity within the plan review process. Monitoring of impacts and review of policies as necessary will continue to be important.

Mitigation/positive impacts contingent on:

- Context sensitive site allocations.
- Local jobs policies; managed release and transition policies.
- Policies managing the environmental and neighbourly impacts of housing development.
- Activation of existing housing mix and quality, quality and sustainable design, waste, community infrastructure, sustainable transport and cumulative impact policies.

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty and promote equality of opportunity	The draft policies seek to bolster the supply of homes of various tenures, types and sizes to meet the varied needs of a growing population with diverse needs. Not only does investment in housing benefit the area through multiplier and ripple effects secured by existing policies, in seeking the right balance in provision, resisting the loss of certain types of housing and promoting the delivery of others, policy attempts to ensure that the environments where people live, bolster their economic, personal and community resilience. In turn this makes communities and individuals more likely to be adaptable to changes in economic circumstances, helping to reduce poverty and promote equality of opportunity. The potential negative employment and business impacts of releasing employment land for housing use are mitigated through the application of managed release and transition policies.	Local employment and skills policies; managed release and transition policies
2. To support healthier lifestyles	Draft policies seek to enhance the supply of a mix and choice of homes which other policies should secure as good quality and well-designed, which in turn provides positive impacts on overall health and wellbeing. The policy as written would not prevent the realisation of other policies of the Plan supporting healthier neighbourhoods.	Implementing design, neighbourly development and healthy neighbourhoods policies.
3. To create successful neighbourhoods	<p>A key component of creating successful places which draft policies address by complementing existing policy is ensuring that people have access to a mix of homes of varying tenures and sizes, to meet both the changing needs of a growing population and of individuals throughout their lifetime. Enhanced environmental quality, which can be driven and sustained by a quality housing supply, also helps to stabilise populations, in turn encouraging area investment and the establishment of local networks.</p> <p>Any negative impacts of housing development, such as those arising from build out or which may result from bringing more people to an area, would be managed by existing policies concerning cumulative impact and neighbourly development as well as site allocations attuned to site constraints etc.</p>	<p>Cumulative impact and neighbourly development policies that manage the negative impacts of housing development.</p> <p>Context sensitive site allocations.</p>
4. To ensure people have access to a choice of good quality housing that meets their needs	Draft policies respond directly to this objective via the promotion of housing choice and indirectly through supply policies working in concert with existing design quality policies. Whilst there may be some trade-offs between different sectors of housing needs, policy aims to promote choice via new and emerging sectors and utilising the potential of existing stock.	Implementing quality and design policies; neighbourly development; site allocation specifications.
5. To foster sustainable economic growth	Draft policies aim to guide the housing market, promoting housing types that are also business interests, as well as a continued supply of units, which may act to stimulate local construction industries that promote opportunities for Newham residents (through the application of existing employment and skills training policies). In recognising emerging products and suppliers, policy actively promotes more socially sustainable, better quality provision, helping to develop the borough as an attractive place to invest, which could aid to foster economic growth. The employment and business impacts of releasing employment land for housing use are mitigated through the application of managed	Implementation of skills and employment access and managed release/transition policies.

	release and transition policies.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Limited direct impacts on this objective identified, however policies/ allocations promoting large scale housing delivery seek to direct it to sustainable locations where supporting facilities can also be accessed or else delivered through mixed use development. Some proposed site allocations may result in loss of community facilities floorspace but this would be mitigated within the overall strategy that involves consolidation, re-provision maintaining local access and enhancing quality. None of the draft policy clauses are likely to limit access to community facilities and outdoor space or preclude the realisation of existing policies designed to promote this.	Mixed use site allocations and community infrastructure policies
7. To promote resource-efficient development, design and construction	No direct impact envisaged other than making more effective use of land through mixed use development; new development also affords the opportunity to implement sustainable design policies securing more resource efficient design compared to existing buildings, albeit potentially involving some demolition, but existing policies should mitigate this. Draft policies do not inhibit the realisation of other policies seeking to secure resource efficiency.	Implementing design and sustainability policies.
8. To improve air and water quality	Draft policies do not specifically address air or water quality, however they do not inhibit the realisation of other policies seeking to secure environmental quality improvements, and new development brings the opportunity to implement these, securing improvements compared to the status quo.	Implementation of design and sustainability policies.
9. To increase the proportion of journeys made by sustainable modes of transport	Limited direct impacts on this objective identified, however policies/ allocations promoting large scale housing delivery seek to direct it to sustainable locations where sustainable transport modes are more accessible, and implementation of sustainable transport and cumulative impacts policies would ensure such modes are positively designed into new schemes. Policy as written does not preclude the implementation of policies concerned with promoting sustainable modes of transport.	Implementation of transport and cumulative impact policies.
10. To minimise the production of waste across all sectors and promote the proximity principle	Draft policies do not specifically address this objective, however the promotion of house building may result in construction and demolition waste, though existing and draft policies, will mitigate this. Draft policies would not fetter the application of other policies seeking to realise this objective.	Application of waste policies.
11. To minimise and reduce flood risk	Draft policies do not explicitly incorporate flood risk considerations, though encouragement of housing development enables the application of policies concerned with this objective. A sequential test of proposed housing allocations has also been undertaken.	Implementation of design and sustainability policies.
12. To enhance and protect existing habitats and biodiversity	Housing development may result in loss of some brownfield habitats where vacant land prevails, however this can be dealt with by existing biodiversity policies and any redevelopment will also provide an opportunity to add positive enhancements fulfilling this objective. Draft policies do not inhibit the realisation of policies that secure biodiversity protection and enhancement. As per the methodology of the Core Strategy HRA it is concluded that no pathways of impact leading to likely significant effects on any European sites will be created through the additional policy.	Implementation of biodiversity policies.
13. To enhance character, protecting, conserving and enhancing heritage	Though there are limited impacts on this objective, improving housing quality through new supply in concert with design and heritage/character asset policies, may result in overall improvements to design quality that enhances heritage assets and character. Draft policies do not inhibit the realisation of heritage and character asset conservation, protection and enhancement policies.	Implementation of heritage and design policies.

and other character assets		
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Sustainability & Climate Change

This thematic IIA covers policies SC1 - Environmental Resilience, SC2 - Energy & Zero Carbon, SC3 - Flooding & Drainage, SC4 - Biodiversity, SC5 - Air Quality, INF3 - Waste & Recycling, INF4 - Utilities Infrastructure, INF6 - Green Infrastructure & the Blue Ribbon Network, and INF7 - Open Space & Outdoor Recreation. For the full copy of these policies refer to the *Proposed Submission Draft Local Plan*, available at www.newham.gov.uk/planningconsultations

Summary Assessment

Policies assessed here are likely to have positive effects (direct or indirect) in relation to all IIA objectives. Policies specifically address air quality, biodiversity, provision of open space, waste handling, energy generation and resource efficiency, and flood risk, all of which are main IIA objectives in themselves; they also do not preclude the realisation of other policies that more directly address other objectives. Any instances where the proposed requirements might be expected to have possible negative effects in relation to other objectives (the potential for infrastructure interventions to disrupt heritage assets for example, or the need for air quality approaches not to limit the ability of businesses to function in the borough) are mitigated by the carrying through of established Local Plan policy requirements; these are indicated below to ensure continuity within the plan review process. Monitoring of impacts and associated review of policies will continue to be important.

Mitigation/positive impacts contingent on

- Continuation of local jobs policies
- Ensuring that if open water heat pumps are promoted, they do not create unacceptable impacts on water bodies / habitats
- Maintaining policies that promote full and inclusive accessibility in the public realm, outdoor amenity spaces (private and public), and community facilities.
- Activation of other design, sustainable design and successful places policies to for instance, minimise the impacts of infrastructure interventions
- Effective pre-application advice, ensuring sustainability requirements are designed in early to minimise costs and impacts e.g. via ensuring appropriate marketing of space and opportunities, design responses that are more easily absorbed by businesses and households

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty	Measures to improve the capacity and independence of Newham's energy sources (SC1, SC2, INF4) will promote the	Ensure continuation of

<p>and promote equality of opportunity</p>	<p>economic, personal, and community resilience of the Borough as per the Council’s Resilience Agenda. Expanding local and district heat networks and making use of further sources of renewable energy (open water heat pumps) for example will improve Newham’s energy self-sufficiency. Bolstering traditional energy infrastructure and telecoms capacity (e.g. in the Royal Docks, INF4) will keep the Borough a competitive and efficient place for business, boosting the local economy and likely improving the provision of jobs in the long term (the impact of this opportunity is enhanced through the implementation of local jobs policies and the success of Workplace).</p> <p>Other measures that improve resilience overall (such as improving the capacity of homes in high risk flood zones to withstand breaches - SC3) will also carry benefit to those most affected by poverty, residents who do not have the personal safety net to overcome damage to property or the ability to pay high insurance premiums for example.</p> <p>No requirements would be expected to worsen poverty or limit equality of opportunity.</p>	<p>local jobs policies – J3</p>
<p>2. To support healthier lifestyles</p>	<p>Poor air quality has a significant effect on human health, strengthening the Local Plan’s approach to this issue (SC5, SC2) should improve the way it is treated in development and the responses that follow. Improving the climate resilience of biodiversity interventions (SC1) and the way it is valued and protected across the Borough (SC4) may also serve to have long term benefits for air quality.</p> <p>In support of healthier lifestyles for Newham’s residents, the policies proposed seek to improve the quantum, quality, and accessibility of green and open spaces including the Blue Ribbon Network and Lea River Park (INF6 and 7) and encourage remediation of previously developed land, notably gasholder sites (SC1, INF4).</p> <p>As energy and waste solutions are subject to environmental / health considerations (including full enclosure for waste and demonstration of acceptable air quality impacts for energy generation), no elements of the policies as drafted would be expected to have negative impacts on health.</p>	<p>Implementation of environmental safeguards, including activation of appropriate HSE protocols in the design and location of new energy infrastructure.</p>
<p>3. To create successful neighbourhoods</p>	<p>Policies as drafted protect and encourage the enhancement of parks and other open spaces; often cited by Newham’s residents as one of the most valuable and appreciated parts of the built environment, such provision has a significant role in the success of places, helping people to feel positive about the area in which they live and improving the connectivity of neighbourhoods.</p> <p>The avoidance of flooding is an important element of creating successful places, street flooding is known to occur in Newham and is a source of much frustration, and at time financial outlay, for residents. Proposed policy SC3 helps ensure all forms of flood risk are considered, all scales of development respond, and flood resilient design is not at the expense of deactivated and unwelcoming street levels.</p> <p>Adequate utilities provision is an essential element of functional place-making, policies SC2 and INF4 seek to ensure capacity (e.g. for energy and telecoms provision) stays in line with growth, avoiding deficiencies and associated problems in future.</p>	<p>Maintain policies that ensure sensitive design and integration of infrastructure interventions</p>

	No elements of the policies considered would be expected to restrict or limit the other key elements of successful places, for example access to housing, well designed and maintained public realm, or the minimisation of vacancy and disturbance from noise.	
4. To ensure people have access to a choice of good quality housing that meets their needs	While policies as drafted do not directly drive the supply of housing, they do relate to associated quality and help to maintain and improve much of the infrastructure needed to support high housing (open space, utilities provision etc). Flood zone measures would be expected to improve housing quality and resilience in those areas. Requirements that address and improve air quality would be expected to improve living quality in the borough overall, including in all existing and new housing. As the policies do not introduce wholly new or unusual requirements and instead relate to the local implementation of regional and national objectives, they would not be expected to limit the supply of housing.	Nothing identified
5. To foster sustainable economic growth	Improving energy resilience and telecoms capacity (particularly in the Royal Docks and throughout the Arc of Opportunity) is essential to supporting the levels of growth envisioned and realising opportunities to grow the business role, and economic resilience of, the borough. Policies directly address this issue, setting out requirements for new utilities infrastructure and upgrade / reconfiguration of existing elements. Improving flood resilience may also encourage more businesses to locate in the Borough, as will providing a good quality of amenity for employees (e.g. through the provision of open spaces or improvement of air quality). A greater push for air quality neutral development may bring additional restrictions on some forms of business use (industrial or waste uses and those involving HGV movements for example) but early consideration in proposals and implementation of counter-balancing jobs policies should avoid significant harm to the meeting of economic growth objectives. Policies that seek to improve air quality may also have indirect effects in terms of a healthier work-force.	Early discussion of issues at pre-app stage, ensuring design and marketing responses to minimise business impacts.
6. To ensure inclusive access to a range of high-quality community facilities and open space	Policies directly drive the protection and provision of open space in general and establish requirements applicable to deficiency areas and in strategically significant locations including the Lea River Park and Strategic Sites, specifying valuable connections where known. It could also be argued that air quality is a key element of providing safe and high quality outdoor spaces, so SC5 may also have positive benefits in regard to this objective. No elements of the drafted policies are considered likely to limit access to community facilities and outdoor space or preclude the implementation of existing policies designed to promote them.	Maintain policies that promote full and inclusive accessibility in the public realm, outdoor amenity spaces (private and public), and community facilities.
7. To promote resource-efficient development, design and construction	Policies SC1, SC2, and INF3 and 4 specifically address resource efficiency, for example through the promotion of the waste hierarchy, heat pumps, heat networks, passive solar design, land remediation and Sustainable Design and Construction SPG. Policies would be expected to have positive direct effects in relation to this objective; while growth necessarily involves the use of resources, no elements are considered likely to worsen resource efficiency or preclude the realisation of other policies designed to promote it.	None identified
8. To improve air and water quality	Policies directly promote the improvement of air quality (SC5) and water quality (SC1, SC4 and INF6). Whilst some promoted elements of infrastructure have the potential to have harmful environmental effects (emissions from combustion based energy for example or potential effects of open water heat pump installations in rivers) the policies	Ensure that if open water heat pumps are promoted, they do not

	contain appropriate protection and mitigation requirements (such as use of low-emission plant or confirming the ability to gain river licenses).	create unacceptable impacts on water bodies
9. To increase the proportion of journeys made by sustainable modes of transport	Policies protecting and promoting open space and green infrastructure would be expected to encourage walking and cycling by making the borough a generally more attractive prospect for such activities, as would improvement of air quality. Policies promote active use of the Blue Ribbon Network, including for outdoor recreation, transport, and freight.	Nothing identified
10. To minimise the production of waste across all sectors and promote the proximity principle	Policies as drafted (SC1, INF3) promote resource efficiency, improved waste management, and the waste hierarchy and proximity principle. While the growth promoted by the Local Plan overall will inevitably lead to the continued creation of waste, provisions seek to embed the consideration of waste generation and management in the earliest stages of design and planning, ensuring new development is more fit for purpose for modern waste management practices.	Nothing identified
11. To minimise and reduce flood risk	Policy SC3 is designed to minimise and reduce flood risk, and is informed by SFRA and Environment Agency advice. The policy seeks to ensure all scales of development are responding to flood risk proactively and seeks greater innovation in flood resilient design for street levels. The promotion of green infrastructure, soft landscaping, and open space is likely to improve local drainage and have a positive effect on the risk of surface water flooding. Policy specifies that development should not worsen flood risk to any location.	Nothing identified.
12. To enhance and protect existing habitats and biodiversity	Policy SC4 seeks to standardise the way biodiversity is valued, helping to improve the way habitat protection and enhancement is implemented across the borough. The requirement for planting to be resilient to climate change, when implemented, would also be expected to have an overall beneficial effect on existing biodiversity and green infrastructure (i.e. if some plants are drought resilient, groundwater may remain more available to the habitats that need it). Open water heat pumps could have an impact on water habitats but implementation of protection requirements should ensure that this is kept within acceptable limits. As per the methodology of the Core Strategy HRA it is concluded that no pathways of impact leading to likely significant effects on any European sites will be created through policies proposed. Minor proposed revisions to MOL and greenspace will extend the protection of green infrastructure/relate to existing operational realities, with additional clarification of the protection afforded designated and undesignated GI assets.	Activate existing biodiversity policy in respect of potential water habitat impacts
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Any policies that might have the potential to affect townscape (infrastructure improvements for example) will be subject to other policies that ensure sensitivity to key aspects of local character and heritage. Open space plays a significant role in local character, its protection and promotion as per policy INF7 is likely to improve the quality of the public realm / built environment in certain locations currently lacking in open space provision.	Ensure implementation of heritage and design policies

Strategic & Sustainable Transport

This thematic IIA covers policies INF1 Strategic Transport and INF2 Sustainable Transport. For the full detail of draft policies appraised here (INF1 and INF2) please refer to the Proposed Submission Draft Local Plan (November 2017) available to view at www.newham.gov.uk/planningconsultations

Summary Assessment

Strengthening the existing policies that promote the securing of investment in the strategic transport network and a more sustainable pattern of movement has positive impacts in relation to objectives including sustainable travel, health, and air quality; and does not preclude the achievement of other objectives through implementation of policies under other thematic headings. Any areas where the draft policies might be expected to have potential negative effects

are already safeguarded by the carrying through of well-established Local Plan policies. These instances have been identified below to ensure continuity within the plan review process. Monitoring of impacts and review of these policies as necessary will continue to be important.

Mitigation/positive impacts contingent on

- Waste management/sustainable construction policies
- Neighbourliness, cumulative impact and healthy neighbourhoods policy
- Existing transport policies
- Heritage/character policies.

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty and promote equality of opportunity	Securing investment in strategic transport I(INF1) and promotion of sustainable travel (INF2) will support this objective in that it will better connect people to jobs (J1-J3), homes (H policies) and social infrastructure (INF8), support healthier lifestyles (SP2) for all improved through walking and cycle routes and secure investment to improve people's access to lower cost travel opportunities.	n/a
2. To support healthier lifestyles	The draft policies enhance a suite of existing policies that seek to promote a more sustainable pattern of movement and therefore help to promote healthier active travel (SP2) with air quality benefits (SC5). The draft policy helps to better acknowledge and encourage upfront mitigation of the more negative impacts of strategic transport infrastructure investment, for example noise, complementing existing health impact policy.	Implementing design, neighbourly development and healthy neighbourhood policies
3. To create successful neighbourhoods	The draft policies seek to support and secure investment in a connected network of streets for walking and cycling, to better manage parking provision considering local context and existing stress and support ongoing investment to reflect growth in transport infrastructure whilst minimising its negative spatial impacts. The draft policies seek to support this objective in improving people's access to jobs, social infrastructure and places to visit, improving existing neighbourhoods as well as creating successful new ones. Mitigating any negative impacts of transport investment on places is also the focus of the draft policies a, better highlighting provision in existing policy.	Neighbourliness, cumulative impact and healthy neighbourhoods policy
4. To ensure people have access to a choice of good quality housing that meets their needs	Improvements to connectivity and transport in the draft policies broaden people's choice of housing (H1) by widening their area of search in relation to other access needs. Transport improvements also encourage investment more broadly in development such as housing. Reducing the negative spatial impact of strategic transport infrastructure such as depots may help release land for housing use (INF1/2). As such the draft policy complements housing policies and does not inhibit the realisation of this objective.	Implementation of quality and design policies; site allocation specifications
5. To foster sustainable economic growth	Securing investment in Newham's strategic transport network supports this objective by further integrating the borough with the rest of London, which in turn helps to attract investment in growth sectors (J1) and support the existing business base in Newham. Employment land is directed towards accessible locations in which opportunities to promote sustainable travel would be sought and promoted with existing and new businesses. More sustainable travel as promoted by the draft policy should also help secure economic resilience.	Implementation of J policies to secure the provision of employment and skills development.
6. To ensure inclusive access to a range of high-quality community facilities and open space	The draft policies do not explicitly deal with community infrastructure, however requirements seek to support growth and improve people's access options, which would include access to a range of community facilities (INF8) and open space (INF7), providing people with more choice. The draft policy also recognises the importance of open space as a connector/component of sustainable transport, promoting the Lea River Park which acts as both for instance.	Mixed use site allocations and community infrastructure policies

7. To promote resource-efficient development, design and construction	The draft policies will not negatively impact the objectives set out in this indicator. Improving accessibility and connectivity of existing neighbourhoods and places and reducing the negative spatial impact of transport infrastructure could enable the land to be developed more efficiently.	Application of SP8 supporting sustainable construction methods and sustainability policies.
8. To improve air and water quality	None of the draft policies address water quality, though a reduction in road traffic can help reduce runoff. . The draft policy seeks to better manage car parking and support non car modes, which have added benefits of reducing congestion and thereby improving air quality (SC5). The indirect benefits will support this objective in the creation of improved movement corridors (SP7) to tackle congestion and promote better opportunities for sustainable travel along these routes, which in turn support objectives to improve air quality in London.	Application of sustainability policies and design policies.
9. To increase the proportion of journeys made by sustainable modes of transport	The draft policies all seek to positively address this objective.. The draft policies (both directly and indirectly) seek to update and reflect investment priorities in transport infrastructure to reflect growth in Newham and continue to better connect Newham beyond its boundaries. On a local level the draft policies seek to support the objective to ensure a more sustainable pattern of movement across the borough through requirements to better manage car parking to reduce pressures and reduce congestion, seek improvement to pedestrian connections to improve walking and cycling and opportunities to promote and improve public transport across the Borough (INF2). As such the draft policy recognises both at a strategic level (INF1) and small scale changes at a local level to promote and improve the numbers of journeys made sustainable transport, supporting infrastructure (including a boatyard) and ensure a modal shift towards a less car-reliant population.	Implementation of cumulative impact and design policies.
10. To minimise the production of waste across all sectors and promote the proximity principle	Some strategic transport developments may result in construction and demolition waste on the road network, but existing policies and proposed enhancement should mitigate this, promoting re-use and recycling (SP8, INF3). The draft policies would continue to support sustainable construction methods including mitigation of impacts of construction transport on the road network.	Application of waste policies including references to sustainable construction methods.
11. To minimise and reduce flood risk	The draft policies will not negatively impact the objectives set out in this indicator.	Implementation of waste policies.
12. To enhance and protect existing habitats and biodiversity	The draft policies do not explicitly deal with biodiversity considerations. However the draft policies do not preclude the realisation of biodiversity policies (SC4). As per the methodology of the Core Strategy HRA it is concluded that no pathways of impact leading to likely significant effects on any European sites will be created through the additional policies	Implementation of biodiversity policies
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	As with any development, strategic transport projects may have heritage and character impacts, however these should be managed by existing policies. Strategic and sustainable transport measures can complement character asset enhancement – for example, the Lea Way is bringing the asset that is the River Lea into the foreground.	Implementation of heritage and design policies.

Social Infrastructure & Infrastructure Delivery

For the full detail of policies INF5 - Town Centre Hierarchy and Network, INF8 - Community Facilities, and INF9 - Infrastructure Delivery, please refer to the Proposed Submission Draft Local Plan, available to view at www.newham.gov.uk/planningconsultations

Summary Assessment

The policies assessed here are likely to have overall positive effects (direct or indirect) in relation to a number of IIA objectives including those related to successful inclusive neighbourhoods, accessibility and efficient use of buildings and land. The policies as drafted do not inhibit the realisation of other policies that more directly address other IIA objectives, and INF9 in particular complements many. Any instances where requirements might be expected to have possible negative effects in relation to IIA objectives are mitigated by the carrying through of other established Local Plan requirements. These have been indicated below to ensure continuity within the plan review process. Monitoring of impacts and review of policies as necessary will continue to be important.

Mitigation/positive impacts contingent on

- Ensure application of existing housing quality, housing mix and access to employment policies
- Maintain policies that relate to sustainable design and successful places
- Ensure implementation of heritage and sustainable design policies
- Linking infrastructure policies more clearly to the IDP and the concept of infrastructure sufficiency

IIA Objective	Commentary	Mitigation/Positive effect relies upon
1. To reduce poverty and promote equality of opportunity	<p>The policies as drafted seek to increase the provision and inclusiveness of local facilities and spaces (via publically accessible toilets) to meet local needs, supporting social networking opportunities that are an important component of personal and community resilience and equality of opportunity.</p> <p>The policies support the facilitation of successful neighbourhoods, by ensuring that appropriate, quality infrastructure, a vital component of the overarching spatial strategy, is available to all, helping to support wider regeneration poverty reduction and promotion of equality of opportunity..</p>	Implementation of Successful Places Policy SP6, Housing Policies H1&2, Jobs Policy J3.
2. To support healthier lifestyles	Facilities addressing local need may help to support healthier lifestyles in numerous ways, via the introduction of health facilities or those that allow for physical activity. Access to multifunctional spaces and improving the number of publicly accessible toilets also helps to promote social inclusion for increased well-being and mental health. Expanding the town centre network to include provision in new neighbourhood areas continues to promote active travel with its direct and indirect health benefits. INF9 complements these by ensuring strategic planning of vital infrastructure and noting the role of affordable and family housing and access to employment as priorities alongside such more typically defined infrastructure, which all affect health outcomes. Other policies as drafted do not affect the realisation of this objective through existing policies.	Implementation of Successful Places Policies SP1, SP2 and SP6 and Infrastructure Policy INF2.
3. To create successful neighbourhoods	<p>The policies, as drafted, aim to create more successful neighbourhoods by better managing the location and composition of social/community infrastructure to meet local and strategic needs, in turn providing quality facilities to support existing and growing communities. Ensuring access to such community infrastructure and infrastructure sufficiency more generally, particularly when broadly defined as per INF9 to include housing and employability interventions should help improve quality of life, local environmental quality, strengthen community resilience and increase the likelihood of people choosing to stay in an area. Managing changing demand for facilities and spaces also helps to manage voids and vacant sites with positive neighbourhood impacts. Town centre strategic sites as drafted should also help to support their positive neighbourhood role.</p> <p>None of the policies, as drafted, would be expected to restrict or limit other key elements of successful places, for example disturbance from noise.</p>	Implementation of Successful Places Policies SP1, SP2, SP3 and SP6 and H1, H2 and J3.
4. To ensure people have access to a choice of good quality housing that meets their needs	The drafted policies promote the inclusion of housing where possible in schemes involving the redevelopment or new build community facilities; this should help support housing supply, and existing housing quality policy would ensure that design achieves compatibility between the 2 uses. None of the drafted policies would prevent the realisation of policies seeking to secure housing quality and INF9 additionally highlights the priority afforded to family and affordable housing delivery.	Implementation of Successful Places and Housing Policies H1-H5.
5. To foster sustainable economic growth	The policies seek to facilitate more appropriate operation of market forces in relation to commercial community facilities, allowing employment-generating uses to evolve where appropriate to meet market opportunities as well as local needs. The policies, as drafted, also seek to increase the level of development within town centres through	Implementation of Jobs Policies J1-J3.

	strategic development sites, renewal of existing stock and increase in density, and the promotion of new centres where footfall and local population would support their viability. Infrastructure sufficiency as required by INF9 is also an important component of economic growth. These policies may lead to increased employment and business opportunities for local residents, promoting economic resilience.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	The policies, as drafted, seek to maximise the effectiveness of community facilities, balance competing needs for specific uses and deal with issues of availability of sites to maximise local provision, ensuring its sufficiency and quality in relation to local needs going forward. It also promotes new accessible local centre sites to act as foci for such uses in new neighbourhoods. In doing so, access to social infrastructure, particularly those which meet local needs can be improved, addressing any deficiencies. INF9 should help address open space deficiencies by requiring infrastructure sufficiency.	Implementation of Infrastructure Policies INF6 and INF7 plus SP8 and SP9 .
7. To promote resource-efficient development, design and construction	No impact envisaged other than the possibility of making better use of existing facilities, and land in new development by encouraging multifunctional spaces, assisting in making better use of scarce land resources. New development also presents the opportunity to improve the sustainability of the 'stock' of community facilities through the application of existing policies.	Implementation of Sustainability and Climate Change Policies SC1-SC5.
8. To improve air and water quality	Through the allocation of Gallions Reach retail park within a Strategic Site, the redesign of the retail park would be required in order to create a town centre within a neighbourhood, which should make it much more walkable and lead to a reduction in the need to travel to it by car, and in turn result in improvements in air quality and run off. The policies, as drafted, specify the creation of new local centres in walkable locations close to public transport nodes, where there are gaps in the network and significant levels of development proposed. This may also reduce the need for car borne transport and improve air quality. Physical infrastructure sufficiency sought by INF9, and modal shift support by transport projects highlighted in the IDP should also help ensure positive air and water quality trends.	Implementation of Sustainability and Climate Change Policies SC3, SC4 and SC5 plus INF1 and 2 .
9. To increase the proportion of journeys made by sustainable modes of transport	The policies, as drafted, specify the creation of new local centres in proximity to public transport nodes, where there are gaps in the network and significant levels of development proposed. In addition, through the allocation of Gallions Reach retail park within a Strategic Site, the redesign of the retail park would be required in order to create a town centre with a transformation in its access to make it much more walkable. These policies may increase the proportion of journeys made by sustainable modes of transport across the borough over time. INF9 further complements other policies concerned with promoting sustainable modes of transport.	Implementation of Successful Places Policies SP2, SP6 and SP7 and Infrastructure Policies INF1 and INF2.
10. To minimise the production of waste across all sectors and promote the proximity principle	The policies, as drafted, positively promote the re-use of buildings, though in some cases demolition will be involved with some waste arising, highlighting the importance of the policy drafted elsewhere to introduce Site Waste Management Plans. New social infrastructure development brings the opportunity to design-in resource efficiency and measures to encourage reuse and recycling (e.g. through the provision of recycling storage).	Implementation of Sustainability and Climate Change Policy SC1 and Infrastructure Policy INF3.

11. To minimise and reduce flood risk	<p>New social infrastructure development brings the opportunity to design in flood resilience to previously developed sites. Other policies, as drafted, do not preclude the implementation of other policies concerned with managing any flood risk incurred.</p> <p>Policy INF9 embeds the IDP which includes reference to flood risk mitigation projects, within the plan.</p>	Implementation of Sustainability and Climate Change Policy SC3.
12. To enhance and protect existing habitats and biodiversity	No impact envisaged. The policies, as drafted, do not preclude the implementation of other policies that deal with biodiversity impacts incurred through controlling design responses and the acceptability of more specific locations. As per the methodology of the Core Strategy HRA it is concluded that no pathways of impact leading to likely significant effects on any European sites will be created through the additional policy as drafted.	Implementation of Sustainability and Climate Change Policy SC4.
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	The policies, as drafted, seek to reinforce the likelihood of community infrastructure, many of which are regarded as local character assets including pubs being retained in viable uses relevant to local needs. The policy related to Gallions Reach presents the opportunity to significantly enhance the character of the area through transforming it into a different development typology. Otherwise policy as drafted does not directly affect the objective, but does not preclude the implementation of other policies that deal with heritage and character impacts incurred through controlling design responses.	Implementation of Successful Places Policies SP1 and SP5.

Appendix 4 – Sites IIAs

Silvertown Landing (S09)

Area	5.60 ha	Current use	Storage, distribution, general industrial uses (some vacancies), vacant A4		Approximate Postcode	E16 2AA
Existing allocations	None		Extant permissions	None		
Existing designations	SIL / Employment Hub. District/Metropolitan Parks Deficiency, Access to Nature Deficiency, Silvertown Tunnel safeguarding, Cable car alignment, Mooring Point					
Proposed allocation	Mixed Use Strategic Site	Alternative options not taken forward		No allocation (retain SIL designation)		

Summary Assessment (further details in the table below)

Overall, compared to the status quo, mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment, and securing better integration with the wider context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. A housing-only allocation would bring some of these opportunities, but would not necessarily sufficiently compensate for the employment lost and allow for appropriate buffering of the neighbouring SIL. An employment-only allocation would ignore another important part of the site's context with the potential to improve connectivity and density in conjunction with developments in the vicinity.

Site allocation must address:

- Appropriately address contamination, flood risk, (including TE2100 strip) noise pollution and air quality issues, and buffering neighbouring SIL and transport infrastructure
- Relocation strategy where appropriate, and other aspects of managed release; managed intensification of retained SIL;
- Employment uses to address transition to SIL, and to complement uses within neighbouring Silvertown Arches LMUA;
- Connectivity with the Royal Victoria and Thames Wharf areas, including DLR and local centre provision, and with Canning Town Town Centre and tube;
- Permeability and riverside access and activation, with links contributing to Lea River Park.
- Protection of neighbouring SINC, protection or re-provision of mature trees where possible
- Mix to include appropriate community facilities where not otherwise provided for.
- Explore connection to district heating network.
- APA Tier 3, Mooring Point, Cable Car alignment

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	50% most deprived	<p>Whilst re-development would entail some loss of employment and business accommodation, this would be covered by managed transition policy (J4) to mitigate the effects. Moreover, the site is located within a broader employment hub and adjacent to SIL and LMUA, providing local access to employment opportunities. The DLR link close by provides access to opportunities further afield.</p> <p>There is opportunity to improve employment densities and variety on site, particularly as current uses are low intensity. Although redevelopment may involve some movement/ displacement of industrial uses, it is considered that these could be re-located to other areas of SIL, and overall the site is presently underused. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to local schools and other social infrastructure (including community facilities) to support local needs, could be brought forward on the site as part of an appropriate mix and choice. Improving walkability across the site (to surrounding areas) to connect with opportunities, will be important to address the low PTAL.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating as well as residential floor space.</p>	<ul style="list-style-type: none"> - Activation of managed release policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	1-2 (very poor – poor) across the site. (but likely to improve with activation of DLR station adjacent)		
	Proximity to employment land	SIL adjacent Within Employment Hub LIL within 1200m LMUA beyond 1200m Town Centre Within 800m		
Proximity to schools	Primary within 800m Secondary within 800m			
2. To support	Health facilities	Brittania Surgery within 800m.	Overall the site provides a good opportunity to contribute	- Incorporate greenspace into

healthier lifestyles	Green Space	SINC intersects with the site. Local Park and Pocket Park within 800m. MOL beyond 1200m.	to healthier lifestyles, provided walkability is designed in (connecting with the existing network and DLR/bus access) noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	<p>the site in order mitigate pollution.</p> <ul style="list-style-type: none"> - Manage the site so as to protect the site from the noise pollution emanating from the DLR line and Silvertown Way - Secure sustainable transport access and permeability
	Distance to the nearest Town or Local Centre	Within 800m of Town Centre		
	Sports Facilities; opportunities for active travel	Gym facilities located in the Town Centre which is within 800m. Local walking and cycling network adjoins the site.		
	Hot food takeaway hotspot/access to fresh healthy food	Access to a range of fresh, healthy food in the Town Centre which is located within 800m; more limited offer at Royal Victoria within 400m.		
	Air Quality	AQMA along the north eastern perimeter of the site		
	Noise levels	Low to medium, highest along the north eastern perimeter of the site		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	10 minute walk to surgery and town centre facilities	Scale of site offers the opportunity to create a successful neighbourhood from an under-used site that would need to address existing poor access to facilities, noise and air quality issues and secure a transition between residential and employment generating uses.	<ul style="list-style-type: none"> - Given the relatively poor PTAL rating, proposals should enhance links to low-cost modes as far as possible (i.e. walkability, cycling provision, links to public transport network - Activate neighbourliness and other design policies to facilitate transition and
	Proximity to identified centre	Canning Town Town Centre within 800m		
	PTAL	1-2 , very poor – poor (but likely to improve with activation of DLR station adjacent)		
	Under-used / derelict land	Yes		

	Noise	Low to Medium		<p>integration between uses</p> <ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights. - Issues of air and noise pollution to be addressed in design and layout.
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1-2 (very poor – poor) across the site. (but likely to improve with activation of DLR station adjacent)	The site’s context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, any new employment generating uses, the future tunnel and road are addressed.	<ul style="list-style-type: none"> - Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring uses	SIL, Thames Tideway Tunnel safeguarding area, main road, river.	Opportunities exist to increase walkability within the site (better connecting it to walking/cycling routes and public transport).	
	Air Quality	Adjacent		
	Walkability	Poor		
5. To foster sustainable economic growth	PTAL	1-2 , very poor – poor (but likely to improve with activation of DLR station adjacent)	Allocation of this site would encourage the redevelopment of an underused and largely vacant plot of land. . Partial retention of the existing SIL designation, would present opportunities for investment in a higher quality business and industrial environment with market-appropriate premises and facilities that are also able to secure the integration of and transition from industrial uses to new residential neighbourhood on the remainder of the site. Any release of SIL would be subject to managed release criteria.	<ul style="list-style-type: none"> - Mitigation measures to protect employment at this location will be subject to tests against the managed release criteria (J4, J2) including: <ul style="list-style-type: none"> ▪ Consistency with spatial strategy ▪ Relocation strategy ▪ Market testing (demand) ▪ Supporting regeneration objectives ▪ Provision of a higher number and better
	Allocation likely to disrupt existing active business	Some – storage and distribution on site (some vacancies)		
	Allocation likely to provide net additional space for business use	Some – employment led mixed use		
	Access to freight network (road / rail / water)	Good – North Woolwich Road / Thames Wharf	Provision of the safeguarded DLR station (Thames Wharf) would seek to better connect this site to wider employment opportunities including Canning Town.	

			Additional population in the area would support businesses and development to add to the pool of local labour.	quality jobs
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No	Good level access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF6/8. Lyle Park is located within a ten minute walk of the site and will be easily accessible via the DLR once the station has been activated adjacent to the site.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6).
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC intersects with the site. Local Park and Pocket Park within 800m. MOL beyond 1200m.</p> <p>Medical facilities: Britannia Surgery within 800m.</p> <p>Education facilities: Primary and Secondary School within 800m.</p> <p>Community Facilities: Community Links Community Centre and a library located in the Town Centre, also within 800m of the site.</p> <p>Childcare: above average provision of childcare places both for children aged between 5 and 14 and for children under age five.</p>		
	Scope for visibility / other improvements to existing facilities	No existing facilities		
7. To promote	Re-use / intensification of previously developed /	Yes	This part of the borough is relatively under-served by local	- Improve connection to

resource-efficient development, design and construction	underused land		<p>facilities though a new local centre is under development at Royal Wharf, redevelopment should enhance walkable links to it and to Canning Town TC. Whilst the PTAL is currently very poor, activation of the station in Thames Wharf Strategic Sites to the north-west will improve service of the site.</p> <p>Policies promoting re-use and recycling should be activated, new builds are likely to be more energy efficient (as specified within the scoped policy framework) than the structures currently on site. As some of the site is currently vacant, redevelopment would mean a more efficient use of land resource.</p> <p>Freight access for employment-generating uses would be road based even if it can connect with local wharves; this would affect the sustainability of an employment-only allocation.</p>	<p>sustainable modes of transport including through contribution to enhanced public transport services where necessary.</p> <ul style="list-style-type: none"> - Enhance access to facilities, connection to forthcoming local centre and Canning Town TC - Re-use of materials and energy efficient build - Investigate feasibility of DH connections - Employment generating uses reliant on freight to be balanced with road capacity.
	PTAL / access to local facilities	1-2 (very poor – poor) (but likely to improve with activation of DLR station adjacent) / reasonable access to Canning Town town centre, poorly served by smaller centres		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves		
	Scope for re-use of buildings / materials	Limited		
	Proximity to heat network	Within 1200m existing, within 400m Potential		
8. To improve air and water quality	Proximity to water bodies / SPZs	Adjoins Thames, no SPZ	<p>Incorporation of SUDS as specified within the existing policy framework would improve quality of surface water run-off.</p> <p>Compared to the current position, redevelopment is likely to increase the levels of greening on site, with potential benefits for air quality if mature trees are incorporated.</p> <p>Redevelopment may reduce freight movements (given industrial uses currently on site) with benefits to air quality particularly if enhancement of access to sustainable modes is delivered through activation of INF2.</p>	<ul style="list-style-type: none"> - Implementation of biodiversity policies including provision of mature trees. - Implementation of SUDS requirements - Enhance access to sustainable modes of transport - Adequate investigation & remediation of land contamination
	AQMA	Yes		
	PTAL	1-2 , very poor – poor (but likely to improve with activation of DLR station adjacent)		
	Likelihood of land contamination	High		
	Impact on trees / GS	Minimal		
	Disruption of vehicle-heavy, polluting or contaminative use	Likely		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	1-2 , very poor – poor (but likely to improve with activation of DLR station adjacent)	<p>Designation of this site would present an opportunity to reduce the dominance of car-based activity and better promote sustainable modes of transport. Improvements are sought to along North Woolwich road for pedestrians and cyclists.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will reduce dominance of car-based access and

			<p>Activation of the DLR station (Thames Wharf) would improve connectivity to the north improving the sites access to public transport from the site and sustainable travel to Canning Town and beyond. As such allocation of this site alongside infrastructure requirements would have a positive impact on this objective.</p> <p>Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) and any increased demand highlights the importance of strategic transport investment as per INF1.</p>	improve sustainable travel connectivity, capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Likely minimal household waste, some industrial waste though premises are under-occupied	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with scope to design in more efficient waste management than currently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / Proximity to waste facilities	Good, ~7km by road to Jenkins Lane		
11. To minimise and reduce flood risk	Flood zone	FZ3	The site is wholly within flood zone 3 therefore adequate flood risk assessment with mitigation where needed and a responsive approach to site layout and design is essential.	<ul style="list-style-type: none"> - SUDS to improve drainage and local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	Yes	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage given the extent of impermeable surfaces.	
	Proportion of impermeable surface	Almost all of site		
12. To enhance and protect existing habitats and	Proximity to SINC	Adjacent (Thames)	Given the lack of greening on site at present, redevelopment has the potential to significantly improve biodiversity offer. Development would need to ensure no	- Protection and enhancement of SINCs, implementation of GI and biodiversity policies
	Aerial review of site greening	Negligible, one strip of trees		

biodiversity	Natura 2000	No	harm to and enhancement of the adjacent SINC. Provision through redevelopment may help improve green grid links, mature trees should ideally be provided given local air quality concerns.	
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Three Mills CA Beyond 1200m	Development of the site will require standard archaeological investigation for APA Tier 3 as per Policy SP5/5a. Apart from the above development of site does not raise heritage issues.	- Standard archaeological investigation for APA Tier 3 -
	Nearest Listed Building (grade)	Within 400m statutorily listed Cranes at Royal Victoria Dock		
	Nearest ATV	ATV7 Canning Town Beyond 1200m		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 3 APA		
	Proximity to ACV	N/A		
	Potential to enhance other character assets (parks, stations etc.)	NO		

Central Thameside West (S07)

Area	7.97 Ha	Current use	Wharf, vacant land	Approximate Postcode	E16 2AT
Existing allocations	None		Extant permissions	17/02349/PREDEM; 14/00206/NONMAT; 07/01816/LTGDC	
Existing designations	SIL (Thameside West), Employment Hub, Safeguarded Wharves, Protected public access to the river point, Flood Defence Safeguarding				
Proposed allocation	Employment uses Strategic Site, retaining SIL designation and additional wharf safeguarding		Alternative options not taken forward (see Sites OA)	No allocation, remain as SIL/safeguarded wharf	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, an employment uses allocation could support employment growth and place-making objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment, wharf consolidation and securing better integration with the wider context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. Non-allocation would fail to take full advantage of strategic wharf consolidation opportunities and other benefits including specification of a new access road benefiting the wider industrial area, through comprehensive, masterplanned redevelopment.

Site allocation must address:

- Appropriately address contamination, flood risk, (zone 3, TE2100) noise pollution and air quality issues
- Consolidation of wharf activity including relocation strategy and managed release/intensification as necessary (on existing wharves)
- Appropriate quantum/format/type of employment-generating uses and industrial grade access road that provides connection with neighbouring sites
- High quality design, to take account of wider location character and opportunities, and to enhance the riverside.
- Connectivity with DLR station at the north point of the site.
- Ensure no adverse impacts on neighbouring SINCS, (Thames, Lyle Park) and deliver enhancements where appropriate.
- Secure sustainable transport access and permeability through appropriate walking and cycling environments, DLR/bus capacity improvements, and freight operations management.
- Promote connection to district heating network (including opportunities for local energy production) and promote efficient use of resources.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	50% most deprived	<p>The site is located within a broader employment hub and SIL providing local access to employment opportunities. The allocation would provide for a qualitative increase in cargo-handling capacity through wharf activity consolidation and other complementary uses, and the creation of an enhanced industrial core at Thameside West</p> <p>Application of managed intensification policy (revised J2) would need to ensure no loss of wharf capacity as a result of consolidation.</p> <p>The DLR, bus and local roads links provide important sustainable access to a wider employee pool and support sustainable travel to work.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - improvements to public transport access.
	PTAL	2-3 (poor-moderate) across the site.		
	Proximity to employment land	SIL within and adjacent Within Employment Hub LIL beyond 1200m LMUA within 200m Town Centre within 1200m		
	Proximity to schools	Primary and Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Britannia Village Surgery within 400m. CFOA beyond 1200m	<p>Consolidation of wharf activity could result in additional modal shift benefits, beyond the current arrangement of safeguarded wharves. Overall the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in as far as practicable (connecting with the existing network and DLR/bus access), and noise, freight traffic, air quality and contamination are managed. .</p>	<ul style="list-style-type: none"> - Secure sustainable transport access and permeability
	Green Space	Local Park within 200m.		
	Distance to nearest Town or Local Centre	Town Centre within 1200m		
	Sports facilities; opportunities for active travel	Peacocks Gym within 1200m. Local walking and cycling network adjoins the site		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Not located in a hot food takeaway hotspot. Access to healthy food should be provided by new local		

		centre in the locality.		
	Noise levels	Low to High, highest along the northern perimeter of the site on North Woolwich Road		
	Air Quality	AQMA along the northern perimeter of the site		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	CFOA beyond 1200m Primary School within 400m Secondary School within 400m	Despite the low PTAL the locality is well-served by DLR stations and forthcoming connections to Crossrail. The scale of the site affords the opportunity to significantly enhance wharf handling capacity and, together with other compatible industrial and warehousing activities on site and in the vicinity, would create a strong employment centre with high value employment uses. Activation of neighbourly development policies and appropriate deployment of employment generating uses would help ensure compatibility with adjacent emerging neighbourhoods, including resolving access conflict in Knights Road.	<ul style="list-style-type: none"> - Given the relatively poor PTAL rating, any proposal should enhance links to low-cost modes as far as possible (i.e. walkability, cycling provision, links to public transport network) - Place-making through high quality design and layout.
	Proximity to identified centre	Canning Town Town Centre within 1200m; new local centre provision in Royal Wharf/Silvertown Quays		
	PTAL	2-3, poor-moderate		
	Under-used / derelict land	Yes		
	Noise	Low to high, highest along the northern perimeter of the site on North Woolwich Road		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-3 (poor-moderate) across the site.	The site would not provide any new homes. However, application of neighbourliness and other design policies, including walkability where relevant, would ensure that adjacent neighbourhoods benefit from enhanced access to employment on this site and that any environmental impacts are mitigate through appropriate transition arrangements.	<ul style="list-style-type: none"> - Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring Uses	SIL, main road, river.		
	Walkability	Poor		
5. To foster	PTAL	2-3, poor-moderate	The allocation would present opportunities for investment	<ul style="list-style-type: none"> - Managed release of wharves,

sustainable economic growth	Allocation likely to disrupt existing active business	No – wharf activity protected, no other active businesses	<p>in a higher quality business environment the Royal Docks, providing important capacity and securing compatibility with remaining and new businesses on the adjacent SIL and proposed activated, consolidated wharf. Providing a new access road would benefit existing uses to the east of the site which are facing increasing conflict with residential traffic in the area.</p> <p>Allocation as an employment Strategic Site presents opportunities to improve personal and economic resilience through new jobs within the Royal Docks, resolving uncertainty about the status of the site which was meaning it was kept vacant due to hope values.</p> <p>To ensure economic opportunities are maximised existing employment on the wharf sites to be released through consolidation at this site, would be subject to managed release criteria.</p>	<p>(off site) SIL consolidation</p> <ul style="list-style-type: none"> - Design policies as scoped should seek to improve relationship between employment uses and residential neighbourhoods adjacent - AS scoped, site allocation to include reference to a new access road benefiting neighbouring industrial uses.
	Allocation likely to provide net additional space for business use	Yes – opportunity for employment uses promoted on site		
	Access to freight network (road / rail / water)	Road and water excellent, rail minimal.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	<p>Loss of community facility or open space</p> <p>Sufficiency data? / Existing Provision</p>	<p>No</p> <p>Greenspace: Lyle Park within 200m.</p> <p>Medical facilities: Britannia Village Surgery within 400m.</p> <p>Community facilities: West Silvertown Community Foundation, The Britannia Village Hall within 400m.</p> <p>Education facilities: Primary and Secondary schools located within</p>	<p>Allocation would support investment in a higher quality business environment, including walkability and integration with neighbouring uses. Also opportunity to enhance Lyle Park nearby though reduction of access conflict in the area.</p>	None

		400m. Childcare: There is a day care centre for birth to age six within 400m. There is above the borough average in relation to both under 5s childcare provision and for those in the 5-14 age group.		
	Scope for visibility improvements to existing facilities	No existing facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Site largely vacant limiting scope for building re-use, though policies promoting re-use and recycling of materials should be activated. Dated industrial structures currently on site likely to be energy inefficient compared to new build as specified within the scoped policy framework. Additional freight activity generated by the consolidated wharf and other new uses on site will need to be balanced with road capacity. Given the poor PTAL, redevelopment will need to address public transport connectivity so as not to increase reliance on private motor vehicles.	<ul style="list-style-type: none"> - Potential connection to heat network - Employment-generating uses reliant on freight to be balanced with road capacity. - Enhance access to sustainable modes of transport
	PTAL / local access to facilities	2-3 (poor-moderate) / relatively poor		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	<800m to existing, intersects Potential		
8. To improve air and water quality	Close to water bodies / SPZs	Adjacent to Thames / no SPZ	While freight activity to the site may increase, it would nevertheless represent an improvement on the current safeguarded wharves arrangements in the Royal Docks reducing number and length of trips and allowing for better management, with potential air quality benefits in the long term. Enhanced wharf capacity will also present opportunities for additional transfer from road to water-borne freight with air quality benefits. Given the poor PTAL rating of the location, redevelopment should seek to enhance access to sustainable modes of transport so as not to increase reliance on private motorised modes.	<ul style="list-style-type: none"> - Enhance access to sustainable modes of transport - Inclusion of SUDS - Implement GI policies (specifically mature tree inclusion)
	AQMA	Yes, north side		
	PTAL	2-3, poor-moderate		
	Likelihood of land contamination	High		
	Impact on trees / GS	Negligible		
	Disruption of vehicle-heavy, polluting or contaminative use			

			<p>Redevelopment provides an opportunity to increase levels of greening on site, with associated benefits for air quality.</p> <p>Policy framework as scoped should ensure no harmful impacts on the waterway, inclusion of SUDS is likely to improve quality of surface water run-off (particularly given the likelihood of land contamination).</p>	
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2-3, poor-moderate	<p>The site's poor PTAL rating means allocation may lead to increased car usage at this location, however it is adjacent to a DLR station. By helping to resolve access conflict in the adjacent site, with the new access road, it should enhance the attractiveness of sustainable modes in the wider area.</p> <p>Redevelopment of the site should take care to maximise the uptake of sustainable modes e.g. through cycling infrastructure provision and walkability to and throughout the site as far as practicable, alongside opportunities for improved access and connectivity. Enhanced wharf capacity will also present opportunities for additional transfer from road to water-borne freight.</p>	<ul style="list-style-type: none"> - Design and infrastructure policies as scoped will seek to secure improvements to promote sustainable modes of transport including high quality cycle and walking measures. - Managed release of wharves adjacent, consolidation of wharves on site, and new industrial access road.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No - Some industrial waste	<p>Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in efficient waste management.</p>	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good, ~6 km by road		
11. To minimise and reduce flood risk	Flood zone	3/2	<p>The site is wholly within flood zone 3 therefore adequate flood risk assessment with mitigation where needed and a responsive approach to site layout and design is essential.</p>	<ul style="list-style-type: none"> - SUDS to improve drainage and local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	Yes	<p>Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage given the extent of impermeable surfaces.</p>	
	Proportion of impermeable surface	> 60%		

12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent River Thames, Lile Park within 200m	Given the very limited greening on site at present, redevelopment has the potential to significantly improve biodiversity offer. Development would need to ensure no harm to and enhancement of the adjacent SINCs. Provision through redevelopment may help improve green grid links. Mature trees should ideally be provided given local air quality concerns.	- Protection and enhancement of SINCs, implementation of GI and biodiversity policies
	Aerial review of site greening	Minimal		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Three Mills CA beyond 1200m	Development of this site raises no heritage considerations other than the opportunity to address amenity potential of Lyle Park and the riverside. Application of neighbourliness and other design policies, including walkability where relevant, would ensure that the amenity of adjacent neighbourhoods are mitigate through appropriate transition and management arrangements.	- Activate neighbourliness and other design policies to facilitate transition and integration between uses
	Nearest Listed Building (grade)	Statutorily (Cranes at Royal Victoria Dock) and Locally listed buildings (Harland and Wolfe gates) within 400m		
	Nearest ATV	None		
	Incongruous / poor quality buildings on site	Yes		
	APA	Within 400m		
	Proximity to ACV	No		
	Potential to enhance other character assets (parks, stations etc.)	Yes –Thames, West Silvertown DLR Station		

Lyle Park West (S20)

Area	7.80 ha	Current use	Greenshields Industrial Park plus storage / general industrial uses		Approximate Postcode	E16 2AX
Existing allocations	None		Extant permissions	None		
Existing designations	SIL (Thameside West), Employment Hub, Partly within Strategic Site S22, Safeguarded Wharves, Protected public access to the river point					
Proposed allocation	Mixed Use Strategic Site		Alternative options not taken forward	<ul style="list-style-type: none"> No allocation, retain SIL 		

Summary Assessment (further details in the table below)

Overall, compared to the status quo, mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment, and securing better integration with the wider context including an under-used park. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. A housing-only allocation would bring some of these opportunities, but would not necessarily sufficiently compensate for the employment land lost and allow for appropriate buffering of the neighbouring SIL and wharf. An employment-only allocation would ignore another important part of the site's context with the potential to improve liveability, connectivity and density in conjunction with developments in the vicinity

Site allocation must address:

- Appropriately address contamination, flood risk, (zone 3, TE2100) noise pollution and air quality issues
- Relocation strategy where appropriate, and managed transition; safeguarded wharves
- High quality design, incorporating appropriate densities, mix of uses and building heights, to take account of wider location character and opportunities, and to enhance the park and riverside.
- Connectivity with DLR station at the north point of the site, with potential for a new local centre around it, complementing the emerging Local Centre in the Royal Wharf (Minoco Wharf) development to the east.
- Ensure no adverse impacts on neighbouring SINCS, (Thames, Lyle Park) and deliver enhancements where appropriate.
- Secure sustainable transport access and permeability through appropriate walking and cycling environments, and DLR/bus capacity improvements.
- Appropriate quantum/format/type of employment-generating uses
- Mix to include appropriate community facilities where a local need exists close to the DLR.
- Promote connection to district heating network and promote efficient use of resources use.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	50% most deprived	<p>Whilst re-development would entail some loss of employment and business accommodation, this would be covered by managed transition policy (J4) to mitigate the effects. Moreover, the site is located within a broader employment hub and adjacent to SIL providing local access to employment opportunities. The DLR link close by provides access to opportunities further afield. Furthermore, the current uses are not intensive, presenting the opportunity to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to local schools and other social infrastructure (including community facilities) to support local needs, could be brought forward on the site as part of an appropriate mix and choice. Improving walkability across the site to connect with opportunities will be important to address the low PTAL.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating as well as residential floor space.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	2-3 (poor-moderate) across the site.		
	Proximity to employment land	SIL within and adjacent Within Employment Hub LIL beyond 1200m LMUA within 200m Town Centre within 1200m		
	Proximity to schools	Primary and Secondary within 400m		
2. To support	Health facilities	Britannia Village Surgery	Overall the site provides a good opportunity to contribute	- Protect or replace the

healthier lifestyles		within 400m. CFOA beyond 1200m	to healthier lifestyles, provided walkability is designed in (connecting with the existing network and DLR/bus access) noise, air quality and contamination are dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	greenspace to west of the site in order mitigate pollution. - Secure sustainable transport access and permeability
	Green Space	Local Park adjacent to the site. The land to the south/south east of the site is a SINC.		
	Distance to nearest Town or Local Centre	Town Centre within 1200m		
	Sports facilities; opportunities for active travel	Peacocks Gym within 1200m. Local walking and cycling network adjoins the site		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Not located in a hot food takeaway hotspot. Access to healthy food should be provided by new local centre provision in the locality.		
	Noise levels	Low to High, highest along the northern perimeter of the site on North Woolwich Road		
	Air Quality	AQMA along the northern perimeter of the site		
Likelihood of land contamination	High			
3. To create successful neighbourhoods	Proximity to community facilities	CFOA beyond 1200m Primary School within 400m Secondary School within 400m	Despite the low PTAL the locality is well-served by DLR stations and forthcoming connections to Crossrail. The scale of the site affords the opportunity to create, in conjunction with the neighbouring Royal Wharf site, a successful neighbourhood, making better use of the land and the adjacent park; this could include a new local centre around the DLR station, of a scale and mix of uses that would complement provision at Royal Wharf and Silvertown Quays. Activation of neighbourly development policies and appropriate deployment employment-	- Development should address adjacent Lyle Park public open space. - Given the relatively poor PTAL rating, any proposal should enhance links to low-cost modes as far as possible (i.e. walkability, cycling provision, links to public transport network
	Proximity to identified centre	Canning Town Town Centre within 1200m; new local centre provision in Royal Wharf/Silvertown Quays		
	PTAL	2-3, poor-moderate		

	Under-used / derelict land	Yes	generating uses would help ensure compatibility between new uses and neighbouring industrial activity.	<ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights.
	Noise	Low to high		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-3 (poor-moderate) across the site.	<p>The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, any new employment generating uses and road are addressed.</p> <p>Opportunities exist to increase walkability within the site (better connecting it to walking/cycling routes and public transport).</p>	<ul style="list-style-type: none"> - Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring Uses	SIL, green space (SINC), main road, river.		
	Walkability	Poor		
5. To foster sustainable economic growth	PTAL	2-3, poor-moderate	<p>Allocation would result in the potential for release of SIL designated land to the south of the site. To ensure economic opportunities are maximised existing employment would be subject to managed release criteria. However the allocation would present opportunities for investment in a higher quality business environment the Royal Docks, securing compatibility with remaining and new businesses on the adjacent SIL and proposed activated, consolidated wharf.</p> <p>Redevelopment would be unlikely to be compatible with safeguarded wharf use, however their release would have to satisfy London Plan tests – this would include taking account of the proposed consolidated and expanded wharf on the adjoining site, provided for through its proposed continuing SIL protection ensuring neighbouring businesses would have appropriate wharf access.</p> <p>Designation as a Strategic Site presents opportunities to promote a mixed of uses use in the employment hub,</p>	<ul style="list-style-type: none"> - Managed release of wharves and SIL - Design policies as scoped should seek to improve relationship between employment uses and any other non residential uses
	Allocation likely to disrupt existing active business	Yes - Storage and general industrial uses and Greenshields Industrial Park		
	Allocation likely to provide net additional space for business use	Yes – opportunity for employment uses promoted on site either under managed release criteria or LMUA		
	Access to freight network (road / rail / water)	Road and water excellent, rail minimal.		

			including a possible local centre, which will present opportunities to improve personal and economic resilience through new jobs and homes within the Royal Docks.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No	Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF8/6 particularly around the station, with the potential for a new local centre complementing that at Royal Wharf/Silvertown. Also opportunity to enhance the adjacent open space.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6).
	Sufficiency data? / Existing Provision	<p>Greenspace: The land to the south/south east of the site is a SINIC. Adjacent to a local park and well placed to access new provision in Royal Wharf/Silvertown Quays developments.</p> <p>Medical facilities: Britannia Village Surgery within 400m.</p> <p>Community facilities: West Silvertown Community Foundation, The Britannia Village Hall within 400m.</p> <p>Education facilities: Primary and Secondary schools located within 400m.</p> <p>Childcare: There is a day care centre for birth to age six within 400m. There is above the borough average in relation to both under 5s childcare those in the 5-</p>		

		14 age group.		
	Scope for visibility improvements to existing facilities	No existing facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	<p>Re-development in a very different format likely to limit scope for building re-use, though policies promoting re-use and recycling of materials should be activated. Dated industrial structures currently on site likely to be energy inefficient compared to new build as specified within the scoped policy framework.</p> <p>While this part of the borough is currently under-served by local facilities, a new local centre is under development at Royal Wharf (adjacent to east) which will improve access for this site. There may also be scope to bring forward a small new centre within the site given its proximity to a station.</p> <p>Given the poor PTAL, redevelopment will need to address public transport connectivity so as not to increase reliance on private motor vehicles.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Potential connection to heat network - Employment-generating uses reliant on freight to be balanced with road capacity. - Enhance access to sustainable modes of transport - Ensure walkable links to Local Centre at Royal Wharf
	PTAL / local access to facilities	2-3 (poor-moderate) / relatively poor		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves		
	Scope for re-use of buildings / materials	Likely limited		
	Proximity to heat network	<800m to existing, intersects Potential		
8. To improve air and water quality	Close to water bodies / SPZs	Adjacent to Thames / no SPZ	<p>Redevelopment for residential and resi-appropriate employment uses might be expected to decrease the number of freight movements compared to current industrial uses, with potential air quality benefits in the long term. However, given the poor PTAL rating of the location, redevelopment should seek to enhance access to sustainable modes of transport so as not to increase reliance on private motorised modes. Redevelopment provides an opportunity to increase levels of greening on site, with associated benefits for air quality.</p> <p>Loss of safeguarded wharves may result in some opportunity foregone in terms of transfer from road to water-borne freight with air quality benefits. However this</p>	<ul style="list-style-type: none"> - Enhance access to sustainable modes of transport - Ensure adequate investigation & remediation of land contamination - Inclusion of SUDS - Implement GI policies (specifically mature tree inclusion) - Managed release of wharves
	AQMA	Yes, north side		
	PTAL	2-3, poor-moderate		
	Likelihood of land contamination	High		
	Impact on trees / GS	Negligible		
	Disruption of vehicle-heavy, polluting or contaminative use	Likely		

			<p>would be mitigated by their managed release and provision for potential expanded consolidated wharf on the adjoining site.</p> <p>Policy framework as scoped should ensure no harmful impacts on the waterway, inclusion of SUDS is likely to improve quality of surface water run-off (particularly given the likelihood of land contamination).</p>	
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2-3, poor-moderate	<p>The site's poor PTAL rating means allocation may lead to increased car usage at this location, however it is adjacent to a DLR station and improved links are proposed to the new Crossrail station to the north at Customhouse.</p> <p>Redevelopment of the site should take care to maximise the uptake of sustainable modes e.g. through cycling infrastructure provision and walkability to and throughout the site alongside opportunities for improved access and connectivity.</p> <p>Redevelopment would be unlikely to be compatible with safeguarded wharf use, however their release would have to satisfy London Plan tests – this would include taking account of the proposed consolidated and expanded wharf on the adjoining site, provided for through its proposed continuing SIL protection. Given the wharves are currently not in active use, this is likely to have a neutral impact on this objective.</p>	<ul style="list-style-type: none"> - Design and infrastructure policies as scoped will seek to secure improvements to promote sustainable modes of transport including high quality cycle and walking measures. - Managed release of wharf, adjacent activation and consolidation of wharves.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Likely minimal household waste, some industrial waste though premises are under-occupied	Whilst redevelopment of the site will inevitably create some waste, and new uses may be higher waste generators long term, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in efficient waste management.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good, ~6 km by road		
11. To minimise and reduce flood risk	Flood zone	3	The site is wholly within flood zone 3 therefore adequate flood risk assessment with mitigation where needed and a	<ul style="list-style-type: none"> - SUDS to improve drainage and local flood resilience

	CDA	No	responsive approach to site layout and design is essential. Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage given the extent of impermeable surfaces.	- Flood risk assessment and mitigation
	TE2100 strip	Yes		
	Proportion of impermeable surface	> 90%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent, Lyle Park and River Thames	Given the lack of greening on site at present, redevelopment has the potential to significantly improve biodiversity offer. Development would need to ensure no harm to and enhancement of the adjacent SINCs. Provision through redevelopment may help improve green grid links, mature trees should ideally be provided given local air quality concerns.	- Protection and enhancement of SINCs, implementation of GI and biodiversity policies
	Aerial review of site greening	Minimal		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Three Mills CA beyond 1200m	Development of this site raises no heritage considerations other than the opportunity to address amenity potential of adjoining Lyle Park and the riverside.	- None
	Nearest Listed Building (grade)	Statutorily (Cranes at Royal Victoria Dock) and Locally listed buildings (Harland and Wolfe gates) within 400m		
	Nearest ATV	None		
	Incongruous / poor quality buildings on site	Yes		
	APA	Within 400m		
	Proximity to ACV	No		
	Potential to enhance other character assets (parks, stations etc.)	Yes – Lyle Park, Thames		

Connaught Riverside (S23)

Area	11.50 ha	Current use	Predominantly storage (including self storage) and distribution, general industry, metal management, hotel, housing, former service station site.		Approximate Postcode	E16 2EE
Existing allocations	Part of the site is in Thameside East SIL		Extant permissions	None		
Existing designations	Small/Pocket and Metropolitan Parks Deficiency, Access to Nature Deficiency, HFT hotspot					
Proposed allocation	Mixed Use Strategic Site, plus LIL designation, and revised employment hub boundaries		Alternative options not taken forward (see Sites OA)	No allocation – retain as SIL and unallocated white land		

Summary Assessment (further details in the table below)

Overall, compared to the status quo, mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area, and securing more local employment, enhancement of the heritage asset and riverside and better integration with the wider context. Opportunities presented through masterplanned new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. A housing-only allocation would bring some of these opportunities, but would not necessarily sufficiently compensate for the employment lost and allow for appropriate buffering of the neighbouring SIL and airport operation. An employment-only allocation would ignore another important part of the site's context with the potential to improve connectivity and density in conjunction with developments in the vicinity and the need to secure a sustainable mix of uses. Having parts of the site remain as unallocated 'white land' would have less strategic impact, downgrading the positive effects and masterplanning potential.

Site allocation must address:

- Appropriately address contamination, flood risk, (zone 3, TE2100 strip) noise pollution and air quality issues.
- Out of centre location as regards town centre uses.
- High quality design, incorporating appropriate layouts, densities, mix of uses and building heights, to take account of wider location character, listed building (St Mark's Church) and riverfront activation opportunities.
- Protection of neighbouring SINC (Thames), protection or re-provision of mature trees where possible; net gain of biodiversity and open space; green grid connections.
- Secure sustainable transport access, connectivity (particularly to addressing railway barriers) and permeability through appropriate walking and cycling environments, and DLR/bus capacity improvements; address road network capacity and functionality.

- Managed release/transition, part protection of Local Industrial capacity, and appropriate quantum/format/type of employment-generating uses.
- Mix to include education facility and other appropriate community facilities where a local need exists that cannot be provided for in more policy compliant locations.
- Potential district heating network.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>Whilst part re-development could entail some loss of employment and business accommodation, this would be covered by Managed Release policy (J4) to mitigate the effects. Moreover, the site is located within a broader employment hub and adjacent to a SIL. Access is available to opportunities further afield though the DLR link.</p> <p>Furthermore, a good proportion of the site (aside from the small industrial estate) is underused, presenting the opportunity to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to local schools and the scale of the site provides an opportunity to incorporate a mix of uses to meet social infrastructure needs as necessary, including through the identified provision of a new school. Walkability across the site however, will be important to connect with opportunities and to address the low PTAL.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating as well as residential floor space.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	1b - 2 (poor) across the site		
	Proximity to employment land	SIL within and adjacent LIL within 1200m Within Employment Hub Town Centre Beyond 1200m		
Proximity to schools	Primary within 400m Secondary within 800m			

2. To support healthier lifestyles	Health facilities	Albert Road Surgery within 400m. CFOA beyond 1200m	Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and DLR/bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	<ul style="list-style-type: none"> - Incorporate greenspace into the site in order mitigate pollution and ensure SINC is protected and enhanced where possible. - Manage the site so as to protect the site from the noise pollution emanating from the DLR line and North Woolwich Roundabout area - Secure sustainable transport access and permeability - Activate cumulative impact policy
	Green Space	SINC located along the southern border of the site, Local Park within 400m, Pocket Park within 800m.		
	Distance to nearest Town or Local Centre	Town Centre beyond 1200m; new local centre provision in adjoining strategic sites		
	Sports facilities; opportunities for active travel	UEL beyond 1200m. Local walking and cycling network adjoins the site		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Eastern half of the site is located in a hot food takeaway hotspot (3). Poor access to fresh, healthy food although a number of outlets can be reached via public transport		
	Air Quality	AQMA along the north-western perimeter of the site		
	Noise levels	Low to High, highest along the north western perimeter of the site.		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Albert Road surgery within 400m	Whilst the PTAL is poor, the site has reasonable – and potential to enhance – access to several DLR stations, and evolving local infrastructure provision as part of other Strategic Sites in the area. The scale of the site affords the	<ul style="list-style-type: none"> - Given the relatively poor PTAL rating, any proposal should enhance links to low-cost modes as far as possible
	Proximity to identified centre	New local centre provision on adjoining strategic sites		

	PTAL	1b - 2 (poor) across the site; walking distance to DLR stations	<p>opportunity to create a new place including enhanced place-making around the listed church, whilst appropriately addressing connectivity across the railways and buffering of adjoining SIL and airport areas.</p> <p>Activation of neighbourly development policies and appropriate location of employment-generating uses would help ensure compatibility between new uses and neighbouring industrial activity.</p>	<p>(i.e. walkability, cycling provision, links to public transport network; specific reference will need to be made to local barriers.</p> <ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, enhancement of heritage asset, mix of housing, building heights - Activate neighbourliness and other design policies to facilitate transition and integration between uses - Issues of air and noise pollution to be addressed in design and layout, focusing employment generating uses at the north of the site and residential to the south.
	Under-used / derelict land	Yes		
	Noise	Low to High (particularly to the north of the site)		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1b - 2 (poor) across the site	<p>The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, any new employment generating uses and road and airport are addressed.</p> <p>Opportunities exist to increase walkability both within the site and beyond (better connecting it to walking/cycling routes and public transport).</p>	<ul style="list-style-type: none"> - Local connectivity improvements. - Place-making through master planning, incorporating appropriate densities and mix of uses to meet local needs.
	Neighbouring Uses	SIL, residential, airport green space, river, main road.		
	Walkability	Fair		
5. To foster sustainable economic growth	PTAL	1b - 2 (poor) across the site	<p>Loss of existing employment-generating floor space could have some negative impacts but this could be mitigated through activation of the managed release policy, signposting of employment-generating opportunities</p>	<ul style="list-style-type: none"> - Mitigation measures to protect employment at this location will be subject to tests against the managed
	Allocation likely to disrupt existing active business	Yes – Thames Road Industrial Estate / St Marks Industrial Estate,		

		Hotel.	(scope to revise hub boundaries and include presently white land) and retention of explicit employment designations/protection at the north of the site.	release criteria and tightened agent of change specifications. Retention and extension of northern employment designation but as LIL rather than SILL
	Allocation likely to provide net additional space for business use	Some – Mixed use (employment led)	<p>Whilst allocation of this site would be subject to managed release (SIL) criteria, designation as a strategic site would present opportunities for investment in a higher quality employment environment within the employment hub and the creation of increased population to support economic development in line with the spatial strategy in the Royal Docks.</p> <p>Additional population in the area would support local businesses and add to the pool of local labour.</p>	<p>- Mitigation measures (buffering) will be sought against any environmental impacts of existing neighbouring industrial uses coming forward as set out in the SP policies.</p>
	Access to freight network (road / rail / water)	Road / water excellent, rail minimal		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No	<p>Good level access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF8/6, including via Thames Barrier Park connections and new open space provision onsite.</p> <p>Furthermore, the site has been identified as a suitable location for an education facility (see IDP).</p>	<p>- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6).</p>
	Sufficiency data? / Existing Provision	<p>Greenspace: Local Park within 400m, Pocket Park within 800m. Though there is a limited amount of greenspace in the area – potential to gain via Thames Barrier park connections and development.</p> <p>Medical Facilities: Albert Road Surgery.</p> <p>Community facilities: Asta Community Centre within 400m.</p> <p>Education facilities: Primary School within 400m, Secondary School within 800m.</p>		

		Childcare: Above the borough average in relation to provision of childcare places for children aged between 5-14 years and for children under 5.		
	Scope for visibility/other improvements to existing facilities	No existing facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	<p>Whilst the site is adjacent to a Local Shopping Parade at Albert Road, this part of the borough is currently under-served by local facilities; however, a new local centre is under development at Royal Wharf (nearby to the west), which will go towards addressing this deficit. Given the poor PTAL of the site, redevelopment will need to address public transport connectivity so as not to increase reliance on private motor vehicles.</p> <p>Policies promoting re-use and recycling should be activated, new builds are likely to be more energy efficient (as specified within the scoped policy framework) than the structures currently on site. As some of the site is currently vacant, redevelopment would mean a more efficient use of land resource.</p> <p>Freight access for employment-generating uses would be road based even if it can connect with local wharves; this would affect the sustainability of an employment-only allocation.</p>	<ul style="list-style-type: none"> - Improve connection to sustainable modes of transport including through contribution to enhanced public transport services where necessary. - Enhance access to facilities, connection to forthcoming local centre / enhancement of local shopping parade. - Re-use of materials and energy efficient build - Investigate feasibility of DH connections - Employment generating uses reliant on freight to be balanced with road capacity.
	PTAL	1b - 2 (poor) across the site		
	Access to rail / water-freight (e.g. for construction)	Good access to local wharves		
	Scope for re-use of materials from existing development	Possible, though what few (relatively) structures are on site are primarily industrial sheds		
	Proximity to heat network	Beyond 1200m to existing but intersects with potential		
8. To improve air and water quality	Proximity to water bodies / SPZs	Adjacent to Thames, no SPZ	<p>SUDS as specified within the existing policy framework would improve quality of surface water run-off.</p> <p>Compared to the current position, redevelopment is likely to increase the levels of greening on site, with potential benefits for air quality if mature trees are incorporated.</p>	<ul style="list-style-type: none"> - Implementation of biodiversity policies including provision of mature trees. - Implementation of SUDS requirements - Enhance access to
	AQMA	Yes		
	PTAL	1b - 2 (poor) across the site		
	Likelihood of land contamination	High		

	Impact on trees / GS	Minimal	Redevelopment may be likely to reduce vehicle use (given storage units currently on site) if improvements to access to sustainable modes are made through activation of INF2.	sustainable modes of transport - Adequate investigation & remediation of land contamination
	Disruption of vehicle-heavy, polluting or contaminative use?	Yes		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	1b - 2 (poor) across the site	Designation at this location would present opportunities to improve the existing high levels of freight movement in this area. Strategic site designation would seek to maximise opportunities to promote sustainable modes of transport, noting its poor level of accessibility and improve the sites connectivity for pedestrians and cyclists. In achieving this, development should improve access to the site and seek improved pedestrian and cycle access to the river (north/south).	- Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Hotel likely a relatively high waste use, vacant land / self-storage unlikely to generate waste	Whilst redevelopment of the site will inevitably create some waste, and new uses may be higher waste generators long term, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in efficient waste management.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good, ~5 km to Jenkins Lane		
11. To minimise and reduce flood risk	Flood zone	3	The site is wholly within flood zone 3 therefore adequate flood risk assessment with mitigation where needed and a responsive approach to site layout and design is essential.	- SUDS to improve drainage and local flood resilience - Flood risk assessment and mitigation
	CDA	Yes		
	TE2100 strip	Yes	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage given the extent of impermeable surfaces. This would be of particular importance given the presence of an identified CDA.	
	Proportion of impermeable surface	Site is almost completely surfaced, small strips of greenery around the hotel and petrol station		
12. To enhance and	Proximity to SINC	Adjacent (Thames) & <300m to Barrier Park	Given the lack of greening on site at present,	- Protection and enhancement

protect existing habitats and biodiversity	Aerial review of site greening	Very little greening, some mature trees around hotel / petrol station	redevelopment has the potential to significantly improve biodiversity offer. Development would need to ensure no harm (and preferably enhancement where possible) of the adjacent and nearby SINC and River Thames. Provision on this site may help to improve green grid links. Mature trees should specifically be provided given air quality concerns.	of SINC, including provision of mature trees and enhanced connectivity.
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Beyond 1200m (East Ham CA)	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	St Marks Church Grade II On site		
	Nearest ATV	ATV9 Bargehouse Road/Woolwich Manor Way Beyond 1200m	Presence of statutory listed building raise significant heritage considerations, which together with riverside part of the site present opportunities for high quality design initiatives to enhance setting.	
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 3 APA		
	Proximity to ACV	On site		
	Potential to enhance other character assets (parks, stations etc.)	Yes - riverside		

North Woolwich Gateway (S04)

Area	6.60 ha	Current use	Largely vacant (cleared satellite site, undesignated greenspace) + Thames Water pumping station (~7% of site), small retail units with residential above, police station, former station building. Crossrail works.		Approximate Postcode	E16 2JN
Existing allocations	Thameside East SIL, HSG32/33		Extant permissions	None		
Existing designations	HFT Hotspot, Tier 3 APA, Employment Hub, Metropolitan Park, District and Local Park Deficiency, Crossrail safeguarding, Protected Mooring Point, Protected Riverside Access Point					
Proposed allocation	Employment-led mixed Use Strategic Site partially retaining SIL designation		Alternative options not taken forward (see Sites OA)	Do not allocate/retain existing non strategic housing sites & SIL		

Summary Assessment (more details in the table below)

Currently comprising some limited employment generating uses, but mostly vacant sites, The site could benefit from investment, intensification and reconfiguration to yield a more varied offer that would complement and support North Woolwich local centre, heritage assets and the riverside location. Overall, compared to the status quo, and less ambitious non-strategic site allocations, large-scale mixed use allocation could support employment heritage and housing, , place-making and sustainable communities objectives, including local environmental improvements, through helping to bring forward comprehensive masterplanned development on site to make best use of it and local character assets, and securing better integration between employment and other uses on site and with the wider context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. A housing-only allocation would bring some of these opportunities, but would not necessarily sufficiently compensate for the employment lost or capacity needs, or allow for appropriate buffering of the neighbouring SIL and ferry access. An employment-only allocation would ignore another important part of the site's context with the potential to significantly enhance the wider neighbourhood, however employment-led is seen to be appropriate, at least in the short to medium term, given significant capacity needed to meet strategic demand, active Regen work and the ongoing impact of the Woolwich ferry until such time as it is decommissioned.

Site allocation must address

- Land contamination, flood risk, (zone 3, TE2100 zone) and air quality (associated with ferry access) issues
- Non-centre location for community uses in proximity of and complementing North Woolwich local centre .
- Re-activation of the retained SIL designation part of the site, and adequate transition to more residential uses, in terms of layout, design.
- High quality design incorporating appropriate densities, mix of uses, and building heights to take account of gateway location and to enhance the setting of heritage assets, one of which is on the 'at risk' register, managing integration and neighbourliness.

- Protection or re-provision of mature trees on site; activation of riverfront
- Protection and enhancement of the neighbouring SINC's (Thames and Royal Victoria Gardens)
- Sustainable transport access and permeability through appropriate walking and cycling environments lessening the impact of lorry-based ferry access and Crossrail barrier effect, improving connectivity to King George V DLR station, and DLR/bus capacity improvements;
- Planning for de-commissioning of the ferry in 15 years' time, with mitigation of air quality in the interim (including through careful location of residential uses).
- Appropriate quantum/format/type/location of employment-generating uses
- Mix to include appropriate community facilities where a local need exists, in a manner well-connected with the local centre.
- Connection to potential district heating network

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>As the current uses are not intensive, an opportunity exists to improve employment densities and variety, complementing existing neighbouring employment-generating uses by helping to buffer them. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Noting the existing smaller scale housing allocation on part of the site, housing and possibly community facilities as part of the mix of uses is be supported, by the site's close proximity to local schools and other social infrastructure in the town centre,. Walkability across the site to connect with opportunities will be important to address the low PTAL.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation. This occurs to best effect if the mix of uses includes employment-generating, community and residential floor space.</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	2 (poor)		
	Proximity to employment land	Within SIL (partially) LIL within 400m LMUA beyond 1200m Within Employment Hub (partially) Town Centre beyond 1200m		
	Proximity to schools	Primary within 1200m Secondary beyond 1200m		

2. To support healthier lifestyles	Health facilities	Albert Road Surgery and a pharmacy within 400m. CFOA further than 1200m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle particularly in the longer term if the ferry is de-commissioned, provided walkability is designed in (connecting with the existing network and DLR/bus access) further takeaways are not created, noise mitigation is maintained, and localised air quality issues and any contamination dealt with. While the ferry remains operational, residential uses should be buffered from its environmental impact, including through consideration of layout and proximity. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities long term. Improved connections to King George DLR station could further contribute to a step change in local sustainable transport take-up.</p> <p>The site provides the opportunity to deliver edge of centre community uses that would cater to local needs and improve opportunities for healthier lifestyle.</p>	<ul style="list-style-type: none"> - Protect the SINC which borders the site on the east and south. - Activate cumulative impact & neighbourliness policy - Secure sustainable transport access and permeability
	Green Space	Local Park adjacent to the site boundary. SINC adjacent to the site, Local Park located within 400m.		
	Distance from the nearest Town or Local Centre	Local Centre within 400m		
	Sports facilities; opportunities for active travel	In excess of 1200m away. Local walking and cycling network adjoins the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Located in a takeaway hotspot (3). Limited access to fresh, healthy food in North Woolwich Local Centre which is within 400m of the site. Numerous outlets are accessible via public transport.		
	Noise levels likelihood	Normal		
	Air Quality	Not in an AQMA but ferry access causes localised problems		
	Likelihood of land contamination	Moderate		
3. To create successful neighbourhoods	Proximity to community facilities	CFOA further than 1200m, Albert Road Surgery within 400m	<p>Site includes a very run-down under-performing part of the North Woolwich neighbourhood, while the presence of the ferry makes it an important gateway to the borough. The allocation should therefore address this through appropriate high quality design and layout, and mix of uses, reflecting the gateway location, but also the fact that it is out of centre and some distance away from the DLR</p>	<ul style="list-style-type: none"> - Given the relatively poor PTAL rating, any proposal should enhance links to low-cost modes as far as possible (i.e. walkability, cycling provision, links to public transport network).
	Proximity to identified centre	North Woolwich Local Centre within 400m		
	PTAL	2 - poor		
	Under-used / derelict land	Yes - site cleared for Crossrail; many buildings		

		in poor condition.	station, and that the ferry will be decommissioned in the long term.	
	Noise	Low	The retention of employment designation on the western part of the site will ensure much needed investment in employment uses, while masterplanning will ensure the seamless integration of and transition from industrial uses to a mixed use hinterland, making better use of place-making assets such as the river and listed buildings	- Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights.
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2 (poor)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, and any new employment generating uses are mitigated. Opportunities exist to increase walkability both within the site and in the residential development to the east (better connecting it to walking/cycling routes and public transport).	- Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring Uses	SIL, greenspace (SINC), river, residential.		
	Walkability	Fair		
5. To foster sustainable economic growth	PTAL	2 - poor	Allocation of this site would encourage the redevelopment of an underused and largely vacant plot of land to help meet borough-wide industrial demand, as well as re-activation of heritage assets as market-appropriate premises and facilities at this location. Masterplanning should secure the integration of and transition from industrial uses. The site benefits from good access points by road and water to support the viable operation of businesses at this location. Additional population in the area would support local businesses including expenditure and visitors to North Woolwich Local Centre and add to the pool of local labour.	- Convergence and neighbourliness policies to secure active use and integration without conflict..
	Allocation likely to disrupt existing active business	No - Part industrial (cleared satellite site, Thames Water pumping station) part vacant land. Some out of centre commercial uses may be encouraged to re-locate.		
	Allocation likely to provide net additional space for business use	Yes		
	Access to freight network (road / rail / water)	Road/ Water excellent, rail minimal		

6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	None	Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF8/6 including via Royal Victoria Gardens connections and new open space provision onsite.	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6). - Ensure the protection of North Woolwich Old Station which is a listed building
	Sufficiency data? / Existing Provision	<p>Greenspace: Royal Victoria Gardens local park adjacent to the site, SINC adjacent to the site, Local Park located within 400m.</p> <p>Education facilities: Nursery within 400m, Primary School within 1200m, Secondary School beyond 1200m.</p> <p>Medical facilities: Medical centre within 400m.</p> <p>Childcare: Above the borough average in relation to provision of childcare places for both children aged between 5-14 years. under 5s. In addition, it is adjacent to Beckton which provides well above the borough average in relation to both age groups.</p>		
	Scope for visibility/other improvements to existing facilities?	North Woolwich Old Station		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Given lack of development on site and/or re-development in a very different format, there is limited scope for building or material re-use other than concerning the listed station; policies promoting re-use and recycling should be activated.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use + energy efficient build - Connection to / creation of DH network should be investigated
	PTAL / local access to facilities	2 (poor) / good, adjacent to North Woolwich Local Centre, <15mins travel time to Woolwich TC (per		

		TfL's TIM function)	Allocation as a Strategic Site as compared to two separate housing sites may facilitate a better, more efficient use of land resources, better integration and transition from employment uses. Redevelopment and intensification should include a more efficient use of land commensurate with its riverside position and town/local centre accessibility. Development should however seek to improve access to sustainable modes of transport given the poor PTAL of the location, e.g. through bus/DLR enhancements.	- Employment-generating uses reliant on freight to be balanced with road capacity.
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via road network		
	Scope for re-use of buildings / materials	Limited		
	Proximity to heat network	Beyond 1200m to existing, intersects with Potential	Freight access for employment-generating uses would be road based with associated capacity issues even if this can connect with local wharves; this would affect the sustainability of an employment-only allocation.	
8. To improve air and water quality	Proximity to water bodies / SPZs	Adjacent to Thames, no SPZ	SUDS as specified within the existing policy framework could improve quality of surface water run-off, policy framework as scoped should ensure appropriate investigation and remediation of land contamination (important given the likely industrial heritage of a site in this location).	- Protection of neighbouring SINC (specifically tree cover) / activation of biodiversity / air quality policies
	AQMA	Not currently (whole borough likely to be designated AQMA)		- Inclusion of SUDS
	PTAL	2 - poor		- Enhance access to sustainable modes of transport
	Likelihood of land contamination	Moderate (likely to have past industrial uses given location)	Whilst the levels of greening and mature trees on site may be reduced through re-development, the site is adjacent to a substantial park, not currently identified as an AQMA, and policy framework as scoped would seek to incorporate greening as far as possible (with associated benefits for air quality).	
	Impact on trees / GS	Yes		
	Disruption of vehicle-heavy, polluting or contaminative use?	No	Allocation would look ahead to ferry de-commissioning when traffic in the area should reduce, and in the interim reduce exposure to air quality. Given the currently under-used nature of the site, allocation will likely lead to an increase in number of	

			journeys to site; development should address enhancements to sustainable modes as far as possible to minimise and mitigate any increase in private car use.	
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2 - poor	<p>Allocation of this site would present an opportunity to reduce the dominance of car-based activity and better promote sustainable modes of transport.</p> <p>The challenges presented with this site include improved connectivity north (including public realm improvements) for walking and cycling between the DLR station (via the local centre) and the site.</p> <p>The site benefits from bus stops at the site and close to the Woolwich ferry access point in which measures to promote its use would support river travel objectives (INF7) and public transport use at this location. Longer-term decommissioning of the ferry would improve the environment for walking and cycling.</p> <p>Overall allocation presents a number of opportunities to have a positive impact on the promotion of journeys made by sustainable modes.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF5, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> ▪ Reduce dominance of car-based access and manage extent of freight access ▪ Improve sustainable travel connectivity, capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste in both construction and ongoing use, the policy framework as drafted will serve to minimise and mitigate as far as possible, with scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good, ~ 3km to Jenkins Lane		
11. To minimise and reduce flood risk	Flood zone	3	<p>The site is wholly within flood zone 3 therefore adequate flood risk assessment (with mitigation where needed) and a responsive approach to site layout and design is essential.</p> <p>Given policy framework as scoped, re-development should not worsen flood risk to any location. Whilst the greening</p>	<ul style="list-style-type: none"> - SUDS to address local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	Yes		
	Proportion of impermeable surface	< 1/2 the site		

			of the currently unused parts of the site is likely to offer good drainage at present, the inclusion of SUDS and use of permeable surfaces means redevelopment can be delivered without increasing the risk of surface water flooding.	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent (Thames and Royal Victoria Gardens)	Whilst the greenspace in this location is undesignated and does not therefore have to be maintained / re-provided in equivalent quantum and quality, the mature trees on site will have significant green infrastructure value and should be protected / re-provided as far as possible as per the scoped policy framework (currently SC5). The adjacent SINC's should be adequately protected /enhanced as per INF6, SP5, SC4 and SC5 (including consideration of green grid links and appropriate improvements to public access).	- Protection and enhancement of neighbouring SINC's, protection / re-provision of mature trees as far as possible
	Aerial review of site greening	Substantial, undesignated		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Beyond 1200m (East Ham CA)	Location within archaeological priority area and presence of statutory listed buildings raise significant heritage considerations. Given location within APA, site will require investigation as per policy framework. Presence of statutory listed buildings present opportunities for high quality design initiatives to enhance their setting and secure viable future uses for them, bringing the Station out of the 'at risk' category. Activation of neighbourly development policies and appropriate location of employment-generating uses would help ensure compatibility between new uses and neighbouring industrial activity.	- Protection and enhancement of heritage and character assets described. - Activate neighbourliness and other design policies to facilitate transition and integration between uses
	Nearest Listed Building (grade)	On site: North Woolwich Station and Foot Tunnel entrance building.		
	Nearest ATV	ATV9 Bargehouse Road/Woolwich Manor Way Within 400m		
	Incongruous / poor quality buildings on site	Some		
	APA	Tier 3 APA		
	Proximity to ACV	Yes		
	Potential to enhance other character assets (parks, stations etc.)	Yes – riverside location		

Canning Town Riverside (S12)

Area	3.77 ha	Current use	EMR Metals open storage/part vacant	Approximate Postcode	E16 4ST
Existing allocations	LMUA	Extant permissions	No		
Existing designations	Employment Hub, AQMA, HFT hotspot, Licensing Saturation Zone, District Parks Deficiency				
Proposed allocation	Mixed Use Strategic Site	Alternative options not taken forward (see Sites OA)	No allocation, maintain SIL and LMUA designations on part of the site.		

Summary Assessment (further details in the table below)

The site is located in the vicinity of Canning Town Town Centre, benefiting from high PTAL rating but with low permeability and connectivity. The Lea River Park vision for the area presents an opportunity to improve access to green space that is well connected to a wider network through new connections and linear green route through this site. Overall, compared to the status quo, a larger mixed use allocation could further support employment, housing and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment and a drive to improve local connections and open space access. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, neighbouring SIL and wharf, to flood risk and health. A housing-only allocation would bring some of these opportunities, but would not sufficiently compensate for the employment lost or allow for appropriate buffering of the neighbouring SIL and protected wharf. An employment-only allocation would ignore another important part of the site's context with the potential to improve connectivity, open space and density in conjunction with developments in the vicinity.

Site allocation must address:

- Appropriately address likely contamination, flood risk, (zone 2/3, TE2100 strip) and air quality issues
- Managed release/transition of employment land and wharf including re-location strategy and wharf viability assessment
- Place-making through masterplanning, with careful attention given to the design and location of any tall buildings and impacts on heritage assets in the area and Lea River park open space connectivity objectives.
- Appropriate quantum/format/type of employment-generating uses to buffer neighbouring SIL and wharf
- Appropriate housing mix and density, with higher density towards the DLR station/Canning Town Town Centre.
- Mix to include appropriate community facilities where a local need exists, in a manner well-connected with the town centre.
- Secure sustainable transport access and permeability through appropriate walking and cycling environments

- Provision of green space in line with the vision for Lea River Park; protection or re-provision of mature trees possible; activation of Lea River riverfront, including through river crossing links.
- Protection of neighbouring SINC (River Lea) and APA Tier 1
- Creation of district heating network and promotion of efficient resources use.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Whilst re-development could entail some loss of some employment and business accommodation, this would be covered by managed transition/ release policy (J2, J4) to mitigate the effects. Moreover, the site is located within a broader employment hub and adjacent to a SIL. (not currently proposed for release) providing local access to employment opportunities, with opportunities (further afield) accessible through the DLR link.</p> <p>Given its context, the site presents an opportunity to improve employment densities and variety and investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported on some of the site, given the proximity to local schools and the scale of the town centre that provides a mix of uses to meet social infrastructure needs. Walkability across the site however, will be important to connect with existing and future opportunities.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes</p>	<ul style="list-style-type: none"> - Activation of managed release and transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	5-6 (very good-excellent) across the site		
	Proximity to employment land	SIL adjacent LIL within 800m Within LMUA Within Employment Hub Town Centre Within 400m		
	Proximity to schools	Primary and secondary within 800m		

			employment-generating as well as residential floor space.	
2. To support healthier lifestyles	Health facilities	CFOA within 800m	Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and DLR/underground/bus access) further takeaways are not created, noise mitigation is maintained, and enhanced where possible, and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	<ul style="list-style-type: none"> - Protect the SINC along the western perimeter of the site in order to mitigate pollution. - Incorporate Green Space within the site. - Secure sustainable transport access and permeability.
	Green Space	Local & Pocket Park within 400m. SINC located along the western perimeter of the site.		
	Distance to nearest Town centre or local centre	Town centre within 400m		
	Sports facilities; opportunities for active travel	Fitness Club located in the Town Centre which is within 400m. Local walking and cycling network in close proximity to the site.		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Located in a takeaway hotspot (2-3). A range of fresh, healthy food is available from a number of outlets in the Town Centre		
	Air Quality	AQMA covers the southern half of the site		
	Noise levels	Low to Medium, higher noise levels on the southern part of the site		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary School and Secondary School within 800m	Urban location close to town centre with high PTAL offers opportunities for housing and employment. Site bounded by roads, river and industrial land offers potential for intensive development that will not impact on neighbours, but will also need to ensure they are adequately buffered.	<ul style="list-style-type: none"> - Local connectivity improvements. - Place-making through master planning, incorporating appropriate densities and mix of uses to meet local needs and buffering of employment/wharf uses. - Noise and AQMA issues from A13 to be addressed in design and layout of LMUA.
	Proximity to identified centre	Canning Town town centre within 400m		
	PTAL	5-6, very good-excellent		
	Under-used / derelict land	Yes		
	Noise	Low to Medium		

4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	5-6 (very good-excellent) across the site	<p>The site's context is challenging for large scale housing delivery, however an allocation that allows for some provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, the road and any new employment generating uses are mitigated.</p> <p>Opportunities exist to increase walkability both within the site, across the A13 road and to Canning Town town centre (better connecting it to walking/cycling routes and public transport).</p>	<ul style="list-style-type: none"> - Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring Uses	SIL, river, major road.		
	Walkability	Poor		
5. To foster sustainable economic growth	PTAL	5-6, very good-excellent	<p>The site forms part of Employment Hub E4 (Cody Road) and is designated as a part of an employment-led LMUA meaning it is already covered by managed transition. Part of the site forms part of SIL land (IBP) within the British Gas/Cody Road industrial park, including a safeguarded wharf.</p> <p>Allocation would need to further address managed transition/release, ensuring the re-location of any incumbent business and re-provision of any wharf need (presently un used) and appropriate buffering of the remaining SIL and wharf. It would be likely in orientation to be more related to the town centre and small scale LMUA opportunities, perhaps in the cultural sector, benefitting from the alternative employment hub.</p> <p>Overall allocation at this location would have a positive impact on employment and economic opportunities within Canning Town and Custom House regeneration area.</p>	<ul style="list-style-type: none"> - Policies will seek the requirement of local resources and labour in the construction phase and provide local businesses with employees. - Activation of managed release & transition policy (J2, J4) in relation to employment uses and wharf.
	Allocation likely to disrupt existing active business	No – Currently open storage land but EMR looking relocate		
	Allocation likely to provide net additional space for business use	Yes – employment led mixed use		
	Access to freight network (road / rail / water)	Road and water excellent, rail minimal		
6. To ensure inclusive access to a range of high-quality community facilities	Loss of community facility or open space	No	<p>Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF6, including via Lea River Park connections and new open space provision at the Limmo.</p>	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6).
	Sufficiency data? / Existing Provision	Greenspace: Local & Pocket Park within 400m. SINC located along the		

and open space		western perimeter of the site, though there is a district park deficiency – potential to gain via Lea River park connections and development. Community facilities: Library & Community Links Centre within Town Centre which is within 400m. Education facilities: Primary and Secondary School located within 800m. Childcare: Levels of childcare provision are amongst the highest in the Borough.		
	Scope for visibility/ other improvements to existing facilities	No existing facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Current land use is inefficient given the excellent PTAL of the site. Redevelopment is unlikely to significantly increase the proportion of journeys made by car, leading to more sustainable impacts on resource use (i.e. petrol) than development of less well-connected sites. The site is adjacent to a town centre at Canning Town, providing good local access to facilities; access to a metropolitan centre at Stratford is also good.	<ul style="list-style-type: none"> - Redevelopment will need to prioritise walkable links to the town centre (potentially including off-site enhancements if necessary) - Create DH network connections where feasible. - Implement sustainable design and build standards as per scoped policy framework.
	PTAL / local access to facilities	very good-excellent / good		
	Freight access by water or rail (e.g. for construction)	Road and water excellent, rail minimal		
	Scope for re-use of buildings / materials	Negligible		
	Proximity to heat network	Beyond 1200m to existing, but within 400m of Potential		
8. To improve air and	Close to water bodies / SPZs	Adjacent to River Lea (no SPZ)	Redevelopment for residential and residential-	- Given AQMA, ensure

water quality	AQMA	Yes	<p>appropriate employment uses would be expected to decrease the number of HGV movements as compared to the present metals recycling use (particularly given the site's excellent PTAL), with associated positive impacts on air quality possible long term. There may be some opportunities for more sustainable freight lost as a result of the loss of the protected wharf, but there is another adjacent, and this should be mitigated by managed release provisions in the London Plan.</p> <p>Policy framework as scoped should ensure no harmful impacts on the waterway, inclusion of SUDS likely to improve quality of surface water run-off (particularly given the likely presence of contaminative substances in the present use).</p>	<p>implementation of air quality policies (including potential 'air quality neutral standard', orientation of vulnerable uses away from pollutant source, and planting of mature trees).</p> <ul style="list-style-type: none"> - Ensure inclusion of SUDS - Enhance access to sustainable modes of transport
	PTAL	5-6, very good-excellent		
	Land contamination	High		
	Impact on trees / GS	Negligible, very little soft landscaping on site		
	Disruption of vehicle-heavy, polluting or contaminative use?	HGV operations and use of chemicals likely given metal recycling		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	5-6, very good-excellent	<p>Given the highly accessible location of this site to the town centre, allocation of this site for redevelopment would positively impact the proportion of journeys made by sustainable modes of transport. Increasing employment and housing opportunities on the site might reduce local residents need to travel further afield for work. Allocation of the site would enhance opportunities for active travel via the Leaway which will improve connectivity north and south for walking and cycling. Connectivity from the town centre is poor for both pedestrian and in which improvements would be sought.</p> <p>There may be some opportunities for more sustainable freight lost as a result of the loss of the safeguarded wharf, but it is not currently in use and there is another adjacent; this should be mitigated by managed release provisions in the London Plan which include provision of alternative local capacity (there is another wharf adjacent).</p>	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability (INF1, INF2, SP2, SP8)

			<p>Through activation of sustainable transport policies as scoped (notably in INF2, SP2, SP8, SP10) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p> <p>Opportunities to promote sustainable modes of transport are would have a positive impact on this indicator for walking and cycling when considering the cross boundary aspirations for strategic pedestrian/cycle links to the site from Tower Hamlets and Leaway adjacent to the site.</p>	
10. To minimise the production of waste across all sectors and promote the proximity principle	Access to road network	Excellent	<p>Whilst redevelopment of the site will inevitably create some waste (and likely higher waste output overall, given nature of current use), the policy framework as scoped will serve to minimise and mitigate, both in construction and on-going use, with the scope to design in efficient waste management. Given that waste handling capacity is safeguarded by existing waste policies, the presumption is that this would be maintained within the area and would not result in a loss of a recycling facility.</p>	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	PTAL	5-6, very good-excellent		
	Proximity to waste facilities	~5 km by road		
11. To minimise and reduce flood risk	Flood zone	2 & 3	<p>Requires activation of appropriate flood risk assessment and mitigation via policy SC3 in terms of the design and orientation of particular uses.</p>	<ul style="list-style-type: none"> - SUDS to improve local flood resilience. - Flood risk assessment and mitigation.
	CDA	No		
	TE2100 strip	Yes	<p>Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage given the extent of hardstanding on site and opportunity to provide SUDs.</p>	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent (River Lea)	<p>Given the lack of greening on site at present, redevelopment has the potential to significantly improve biodiversity offer, specifically given the likelihood of green / open spaces being incorporated into the design. The site is a key part of the Lea River Park vision and provides the opportunity to create greengrid links to both north and</p>	<ul style="list-style-type: none"> - Protection and enhancement of SINC, delivering mature trees and enhanced connectivity.
	Aerial review of site greening	Negligible		
	Natura 2000	No		

			south.	
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Three Mills CA More than 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site does not raise heritage issues. Opportunity to promote better access to the river and make Canning Town station perform better for this site in close proximity.	<ul style="list-style-type: none"> - Archaeological investigation for APA Tier 2. - Activate blue ribbon and sustainable transport policies, plus tall buildings policy as scoped. - Activate neighbourliness and other design policies to facilitate transition and integration between uses
	Nearest Listed Building (grade)	Statutorily listed building Royal Oak public house and Locally listed building Canning Town Library within 400m		
	Nearest ATV	ATV7 Canning Town Within 400m	The northern part of the site could see the redevelopment of the waste site (subject to relocation and managed transition policy) for modern warehousing to help buffer lighter employment and residential uses in the LMUA designated section of the site from the heavy industry to the north of the allocation.	
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 1 APA		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	No		

Coolfin North (S06)

Area	8.00 ha	Current use	Hallsville Primary School, residential, play-space, supported housing (Stanley Holloway Court)	Approximate Postcode	E16 3QD
Existing allocations	HSG 22 & 23		Extant permissions	15/00462/FUL (vacant telephone exchange site, E16 3BD)	
Existing designations	Greenspace (GS291/302/303), parks / access to nature deficiency, HFT (most) & BS (partial) concentrations				
Proposed allocation	Mixed Use Strategic Site (incorporating education, residential, and linear green route)			Alternative options not taken forward (see Sites OA)	Retain existing non-strategic housing site allocations

Summary Assessment (further details in the table below)

The site partly comprises existing non-strategic site allocations but the proposed amendments reflect the scope to achieve wider strategic objectives: re-allocation as a combined and extended site allows for a strategic, master-planned approach that would deliver on connectivity, green grid and community infrastructure objectives for the area. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk. Retaining the housing-only allocation would bring some of these opportunities, but would not direct attention to these wider strategic objectives and opportunities.

Site allocation must address:

- Flood risk (zone 2/3)
- Place-making through master-planning, with careful attention given to the east west (transport hub to the west) and green grid connectivity – linear green route with north/south access spurs/activity street
- Appropriate housing mix and density, with higher density towards the Custom House local centre and transport interchange.
- Mix to include a new all through school with flexible community spaces.
- Protection or re-provision of mature trees on site where possible.
- Potential district heating network

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	10% most deprived	<p>Given the close proximity to a town centre, employment hub, LIL and LMUA employment land the site has good local access to employment opportunities, with those further afield accessible through the DLR/underground station at Canning Town.</p> <p>Redevelopment would not involve the loss of any existing employment land, however investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by existing policies (e.g. S1, SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's inclusion of the primary school and the town centre nearby provides provision of social infrastructure to support local communities. The uses on site also provides an opportunity to intensify inclusive community facilities that support local.</p> <p>Overall, an allocation provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation.</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	2		
1. To reduce poverty and promote equality of opportunity	Proximity to employment land	SIL within 1200m LIL within 400m LMUA within 400m Employment Hub within 400m Town Centre Within 400m	<p>Given the close proximity to a town centre, employment hub, LIL and LMUA employment land the site has good local access to employment opportunities, with those further afield accessible through the DLR/underground station at Canning Town.</p> <p>Redevelopment would not involve the loss of any existing employment land, however investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by existing policies (e.g. S1, SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's inclusion of the primary school and the town centre nearby provides provision of social infrastructure to support local communities. The uses on site also provides an opportunity to intensify inclusive community facilities that support local.</p> <p>Overall, an allocation provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation.</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	Proximity to schools	Primary within site Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Custom House Surgery, St. Luke's Health Centre, and a pharmacy within 400m	<p>Overall the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and DLR/bus access) noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.</p>	<ul style="list-style-type: none"> - Protect and enhance green space on the site in order mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	Pocket Park intersects the site, Local Park adjacent, SINC within 400m		
	Distance to nearest Town or Local Centre	Local Centre adjoining the site. District Centre within 400m.		
	Sports facilities; opportunities for active travel	Peacock Gym is located within 400m, there is a fitness club located in Canning Town District		

		Centre which is located within 400m of the site. Local cycling network adjoins the site and local walking network is in close proximity of the southern boundary of the site		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Located in a hot food takeaway hotspot (2-3). A number of outlets providing fresh, healthy food can be accessed in Canning Town District Centre which is within 400m of the site. New opportunities will also be provided in the new Freemasons/Customhouse local centre.		
	Noise levels	Low levels of noise exposure across the site		
	Air Quality	Not in an AQMA		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within site Secondary school within 800m	Large site encompassing different uses in established residential area adjoining Custom House local centre. The site has a potential role in spreading the benefits of the neighbouring 'Customhouse' strategic site, by being able to provide an important connection and green linear route across the area as part of the longer 'activity street' and with potential to link to Kier Hardie Recreation ground and across land currently within the curtilage of the school. This, together with the new (potentially all-though) school add considerable value from a successful places perspective compared to a residential site allocation, which would just upgrade local housing stock.	- Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights; and mix of uses to meet local needs.
	Proximity to identified centre	Within 400m of local centre		
	PTAL	2		
	Under-used / derelict land	No		
	Noise	Low levels of noise exposure across the site		

4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2	<p>The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the loss of existing housing were mitigated.</p> <p>Opportunities exist to increase walkability within the site, in particular to address permeability in the east of the site (better connecting it to walking/cycling routes and public transport).</p>	- Activation of housing policies to ensure reprovision of existing residential floorspace.
	Neighbouring uses	Residential, some greenspace and commercial retail.		
	Walkability	Good in some areas of the site, poor in the north eastern portion.		
5. To foster sustainable economic growth	PTAL		<p>Allocation seeks to put a new school at the heart of the community providing good quality education for all ages, which should help support local businesses by providing a well-educated workforce. Other than this, no other employment-generating uses are envisaged, but new investment should help support the local economy through multiplier effects, particularly when secured through local procurement and jobs policies. This would be of a greater magnitude than if the non-strategic housing sites were left as such rather than being part of this wider Strategic Site.</p> <p>Allocation at this location would support wider objectives to create a high quality environment including support the economic growth of nearby centres.</p>	- Activation of local jobs and convergence policies.
	Allocation likely to disrupt existing active business	No		
	Allocation likely to provide net additional space for business use	No		
	Access to freight network (road / rail / water)	NA		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Yes, Coolfin Community Centre (vacant)	<p>Good level access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF8/6 including via Kier Hardie Recreation Ground connections and new open space provision onsite.</p>	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6).
	Sufficiency data / Existing Provision	<p>Greenspace: Pocket Park intersects the site, Local Park adjacent, SINC within 400m.</p> <p>Medical facilities: Custom House Surgery, St. Luke's Health Centre, and a</p>		

		<p>pharmacy within 400m.</p> <p>Education facilities: Nursery within 400m, Primary school within the boundary of the site, Secondary school within 800m.</p> <p>Childcare: Levels of childcare provision in Canning Town & Custom House are amongst the highest in the Borough, and well above the borough average, for both under 5s and those between 5 & 14.</p>		
	Scope for visibility/other improvements to existing facilities?	Yes, Hallsville Primary School		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes, council-owned estate identified as having potential for uplift & intensification	Site is heavily developed with a range of building types. While buildings themselves may not be fit for ongoing use, policies promoting re-use and recycling of materials should be activated; size of site may provide efficiencies of scale in this endeavour.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use/energy efficient build - Potential connection to heat network - Enhanced connectivity (within site and beyond)
	PTAL / local access to facilities	2 (poor) / good (adjacent to Custom House Local Centre at eastern end, <400m to Canning Town TC at western end)	New builds as specified within the scoped policy framework are likely to be significantly more energy efficient than existing dated structures, with long-term benefits for resource use.	
	Freight access by water or rail (e.g. for construction)	Good access to Victoria Dock Road for local wharves, no rail freight	An intensified and more efficient use of land in this location would be commensurate with its local and town centre accessibility; while the PTAL of the site is currently poor, it will benefit from Crossrail's arrival at Custom House and associated enhancements to the local network.	
	Scope for re-use of buildings / materials	Significant		
	Proximity to heat network	>1200m to existing, <400m to potential		

			As allocation is likely to improved connectivity within the area this will also help to encourage uptake of active modes (walking, cycling) with potential indirect benefits for resource use.	
8. To improve air and water quality	Close to water bodies / SPZs	No	<p>While the PTAL is currently low, enhancements around Custom House (including the arrival of Crossrail) are likely to significantly improve connectivity, as will reconfiguration of the site itself. These improvements would be expected to minimise any increase in the number of journeys by private motorised modes, serving to mitigate effects on air quality in the long term.</p> <p>Inclusion of SUDS as specified within the existing policy framework would improve quality of surface water run-off.</p> <p>Mature trees are of particular value in addressing air quality concerns, as there are a significant number across this site an adequate strategy to retain / re-provide would be needed. Allocation will likely specify provision of a linear greenspace, with potential benefits for air quality.</p>	<ul style="list-style-type: none"> - Protection / re-provision of mature trees across site - SUDS to address runoff issues - Enhance access to sustainable modes of transport
	AQMA	No, though whole borough likely to be designated		
	PTAL	2 (poor)		
	Likelihood of land contamination	Relatively low (no known industrial history)		
	Impact on trees / GS	Mature trees throughout the site, small plots of designated greenspace		
	Disruption of vehicle-heavy, polluting or contaminative use	Unlikely		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL		<p>Designation of this site would seek opportunities to reduce the dominance of car-based access (given the sites low accessibility rating) and promote sustainable travel with proposals.</p> <p>Development at this location presents opportunities to promote sustainable travel including walking and cycling at this location and improve the connectivity east and westwards between the town and local centre. Proposals would be expected to support the aspirations of the activity street along the southern end of the designation.</p> <p>With housing and education at this location it is expected that sustainable travel will be promoted as a key component to support the overall shift towards a more</p>	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability.

			<p>sustainable pattern of movement.</p> <p>Overall designation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p>	
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	As site will re-provide residential plus school use, waste output will be largely similar	Whilst redevelopment of the site will inevitably create some construction waste, and likely lead to an increase in the number of households (intensification), the policy framework as scoped will serve to minimise and mitigate, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Adequate, site already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	2 / 3	Adequate flood risk assessment (with mitigation where needed) and a responsive approach to site layout and design is essential given the FZ2/3 location.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	Pockets of greenspace, mainly buildings / roadways	As per the scoped policy framework, re-development would not worsen flood risk to any location. Through the inclusion of SUDS and likely provision of a linear green route, redevelopment has the potential to significantly improve local drainage.	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	400m, Ashburton Woodland	Allocation is unlikely to affect an identified SINC. The mature trees throughout the site are of significant green infrastructure value and should be preserved / re-provided as far as possible. Allocation is likely to specify a new linear green route with net benefits for habitat and biodiversity.	<ul style="list-style-type: none"> - Provision of a linear green route - Protection / re-provision of mature trees
	Aerial review of site greening	Mature trees throughout, pockets of green space		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage	Nearest CA	Sugarhouse Lane CA more than 1200m	Development of site does not raise heritage issues. Setting of Keir Hardie park should be enhanced.	- Enhancement of character assets described.
	Nearest Listed Building (grade)	Cranes at Royal Victoria Dock Grade II within 400m		
	Nearest ATV	ATV5 All Saints Church within 800m		

and other character assets	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 1 and Tier 2 APA within 400m		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	The site adjoins the Keir Hardie recreation ground		

Beckton Riverside (S01)

Area	72.9 ha	Current use	Gallions Reach Retail Park, Beckton Gas Works (to be decommissioned), TFL depot, industrial units		Approximate Postcode	E6 7FB
Existing allocations	Employment Hub / existing Strategic Site S19 / safeguarded waste site			Extant permissions	16/00791/FUL (Gallions Reach Shopping Park, E6 7ER).	
Existing designations	Parks deficiency, APA (tier 3), adjoins AQMA, Thames Gateway Crossing Safeguarding, SIL					
Proposed allocation	Mixed Use Strategic Site including town centre, DLR depot and SIL designations		Alternative options not taken forward (see Sites OA)	No allocation (maintain SIL designation)		

Summary Assessment (more details in the table below)

Cessation of the gasworks use and the single-storey nature of Gallions Reach retail park provide good opportunities for intensification through redevelopment partial employment land release, making a more efficient use of land. A mixed use allocation could support housing, employment, strategic infrastructure and place-making/sustainable communities objectives, including local environmental improvements. Particularly there are opportunities include provision to support a mixed and balanced community through the provision of new community facilities, scope to extend the MOL designation and to support both local and strategic infrastructure needs at this location. The redevelopment of this large scale site would include transforming Gallions Reach into a Major Town Centre, strategic transport investment, relocation and consolidation of some industrial/utilities uses, re-use of vacant land and securing better integration with the wider context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, good growth, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. Alternative considerations at the Issues and Options stage included a housing-only allocation would bring some of these opportunities, but would not necessarily sufficiently compensate for the employment opportunity lost and allow for appropriate buffering of the neighbouring SIL. Also at the Issues and Options stage an employment-only allocation was considered, however this would ignore the significant potential of mixed use development to address both housing and employment and infrastructure needs, and make best use of proposed improvements to public transport, concurrently achieving policy objectives around the transformation of the Gallions Reach retail park into a town centre.

Site allocation must address

- Appropriately address contamination, flood risk, and air quality issues
- Managed release and possible managed intensification and relocation strategies

- Place-making through masterplanning to integrate the large scale site as a new neighbourhood or as a series of distinct interconnected neighbourhoods, centred on Gallions Reach as a Major Town Centre, aiming to mitigate the physical presence of DLR depot and other strategic infrastructure (including a potential waste facility and river crossing(s))
- Appropriate quantum/format/type of employment-generating uses
- Appropriate housing mix and density, with higher density towards the DLR station and in the vicinity of a redeveloped Gallions Reach, whilst taking account of the overall low rise context of Beckton area.
- Mix to include appropriate community facilities including parks to meet local need, in a manner well-connected with the town centre.
- Secure sustainable transport access, connectivity and permeability through appropriate walking and cycling links (potential extension to the Greenway), extension of the DLR, and new bus services.
- Protection of, and opportunity to expand and enhance MOL; protection or re-provision of mature trees on site where possible; net gain of biodiversity and open space; activation of riverfront, including through river crossing links.
- Protection of neighbouring SINCS
- Waste allocation provision – master-planning should explore options of provision being accounted for elsewhere.
- Creation of district heating network, promotion of efficient resources use through improved efficiency of land use, reduction in waste generation and increased recycling, and energy efficient build

I/A Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	40% most deprived	Though currently SIL designated land, with the gasworks due for decommissioning, low intensity employment uses elsewhere onsite, and aspiration to reconfigure the existing Gallions Reach shopping park to a town centre environment, a mixed use allocation is unlikely to result in any substantial loss of employment or business accommodation and in any case, change would be covered by managed release policy (J2) to mitigate the effects. Instead the site presents substantial opportunities to intensify the land for employment use, through higher densities and improved varieties. Moreover, the site is located within a broader employment hub, is adjacent to a SIL and further employment opportunities are available through the DLR link (to the south).	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	1-3 (very poor-moderate) across the site		
	Proximity to employment land	SIL within and adjacent LIL within 400m LMUA beyond 1200m Within Employment Hub Town Centre Within 800m		
	Proximity to schools	Primary within 400m Secondary within 1200m		

			<p>Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to the local primary school and given the scale of the site, other social infrastructure, retail and services would be made available, particularly within the proposed town centre that provides an opportunity to incorporate inclusive community facilities to support local needs. Walkability across the site to connect with opportunities will be important to address the low PTAL on parts of the site.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating, town centre and residential floor space.</p>	
2. To support healthier lifestyles	Health facilities	Pharmacy within the perimeter of the site. Tollgate Medical Centre within 1200m. CFOA within 1200m	Overall the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and DLR/bus access) noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	<ul style="list-style-type: none"> - Secure sustainable transport access and permeability - Protect or replace the greenspace north and east of the site to mitigate pollution.
	Green Space	Local Park within 800m, SINC located adjacent to the northern perimeter of the site.		
	Distance to nearest Town or Local Centre	Town Centre within 800m		
	Sports facilities; opportunities for active travel	UEL within 800m. Local walking and cycling network adjoins the site.		

	Hot food Takeaway Hotspot/access to fresh, healthy food	Not located in a hot food takeaway hotspot. Fresh and healthy food available in Gallions Reach Shopping Park.		
	Noise levels	Low – High, highest along the western boundary of the site		
	Air Quality	AQMA located along the western perimeter of the site (Royal Docks Road)		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary School within 400m Secondary School within 1200m	<p>The exceptionally large area of this site and large amount of vacant land creates a unique opportunity to create a new neighbourhood, or even a series of neighbourhoods, centred on a new town centre</p> <p>The site offers scope for the masterplanning of high quality developments which cumulatively will create a well-connected and integrated series of successful and distinctive places; this may include better placement of the existing industrial units and possible waste facility. to allow for a more seamless integration of and transition from industrial and utility uses.</p> <p>Encouraging design that is responsive to context, and high quality in its detail and management of the mix of uses, improving on the status quo.</p>	<ul style="list-style-type: none"> - Local connectivity improvements to enhance links to low-cost modes as far as possible (i.e. walkability, cycling provision, links to public transport network - Place-making through master planning, incorporating appropriate densities and mix of uses to meet local needs. - Masterplan to be centred on Gallions Reach.
	Proximity to identified centre	Beckton Town Centre within 800m		
	PTAL	1-3, very poor-moderate		
	Under-used / derelict land	Extensive stretches of vacant land		
	Noise	Low over most of site but High adjoining Royal Docks Road.		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1-3 (very poor-moderate) across the site	<p>The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, any new employment generating uses and road are addressed.</p> <p>Opportunities exist to increase walkability both within the</p>	<ul style="list-style-type: none"> - Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring Uses	SIL, residential, green space (SINC), river, main road.		
	Walkability	Poor		

			site and through to future residential development to the south (better connecting it to walking/cycling routes and public transport).	
5. To foster sustainable economic growth	PTAL	1-3, very poor-moderate	Designation would result in the partial managed release of vacant SIL designated land within Beckton Riverside, in line with ELR 2017 recommendations which achieve an overall balance through the wider spatial strategy. The large Beckton Riverside site forms part of the employment hub (E01) which recognises agglomeration economies , and the allocation as a strategic mixed-use site will present opportunities to intensify economic opportunities on site amplified by the transformation of Gallions Reach Retail Park into a Major Town Centre. Development will bring forward a variety of employment uses together and investment in a higher quality business environment at this location. Additional population in the area would support local businesses including expenditure and add to the pool of local labour.	- Mitigation measures to protect employment at this location will be subject to tests against the managed release criteria including: <ul style="list-style-type: none"> ▪ Consistency with spatial strategy ▪ Relocation strategy ▪ Market testing (demand) ▪ Supporting regeneration objectives ▪ Provision of a higher number and better quality jobs
	Allocation likely to disrupt existing active business	Yes - but managed transition.		
	Allocation likely to provide net additional space for business use	Yes including town centre uses		
	Access to freight network (road / rail / water)	Road and Water excellent, rail minimal		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No – opportunities to enhance	Limited access to a range of facilities but scope within scale of site to address any deficiencies arising as per INF8/6.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6).
	Sufficiency data? / Existing Provision	<p>Greenspace: Local Park within 800m, SINC located adjacent to the northern perimeter of the site.</p> <p>Medical Facilities: Tollgate Medical Centre</p> <p>Community Facilities: St. Mark's Church & Community Centre are within 1200m of the site.</p> <p>Education: Primary</p>		

		School within 400m, Secondary School within 1200m. Childcare: Beckton provides well above the borough average in relation to childcare for both under 5s and those in the 5-14 years age group.		
	Scope for visibility/other improvements to existing facilities	No existing facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Cessation of gasworks use (bar minimal residual infrastructure) and single-storey nature of Gallions Reach provides good opportunity for intensification through redevelopment, making a more efficient use of land and public transport infrastructure. Re-development in a very different format is likely to limit scope for building re-use, but policies promoting re-use and recycling of materials should be activated. Dated retail sheds are likely to be energy-inefficient compared to new build as specified within the scoped policy framework. The potential scale of development at Beckton Riverside is significant enough to deliver the DH networks identified for this area, with long-term benefits for resource efficiency across the wider region.	<ul style="list-style-type: none"> - Site must come forward with supporting infrastructure if negative long-term effects on resource efficiency are to be avoided (local access to facilities to avoid increase in car use / road network improvements to minimise traffic congestion) - Re-use of materials / energy efficient build - Creation of DH network
	PTAL / local access to facilities	1-3 (very poor to moderate), limited retail at GR		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via road network, some known junction capacity issues		
	Scope for re-use of buildings / materials	Limited, built forms are heavy infrastructure and retail sheds		
	Proximity to heat network	>1200m to existing, intersects with potential		
8. To improve air and water quality	Close to water bodies / SPZs	Adjoins River Thames	SUDS as specified within the scoped policy framework would improve the quality of surface water run-off, as may the disruption of heavy-industry uses such as the gasworks and TFL site. The potential improvement through SUDS inclusion is likely substantial given the amount of car-	<ul style="list-style-type: none"> - Ensure adequate investigation & remediation of land contamination - Enhance access to sustainable modes of
	AQMA	Adjoins		
	PTAL	1-3, very poor-moderate		
	Likelihood of land contamination	High		

	Impact on trees / GS	Yes, but undesignated	parking at Gallions Reach.	transport & address road network capacity - Inclusion of SUDS - Implement GI policies (specifically mature tree inclusion)
	Disruption of vehicle-heavy, polluting or contaminative use?	Yes	Whilst not specifically identified for protection under GI policies, there are areas of greening and mature trees within the site. Implementation of policies scoped to maximise soft landscaping and biodiversity should at least ensure re-provision though more likely improvement, with knock-on benefits for air quality. Reconfiguration of a car-heavy use (out-of-town retail) is likely to reduce traffic impacts on air quality, particularly if redevelopment makes improvements to the accessibility of sustainable modes and addresses road network capacity issues (thereby reducing idling time).	
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	1-3, very poor-moderate	Designation would seek to promote sustainable transport and increased the proportion of journeys made by public transport, especially within the new town centre at this location. The site area has poor accessibility in which current uses are reliant on the car alongside a high level of car parking. Designation including a new town centre will promote investment to achieve a more sustainable pattern of movement across the site and connectivity to the rest of Newham and London, helping to justify additional facilities such as a station and additional DLR connections. Any allocation would facilitate improvement in the proportion of journeys made by sustainable modes.	- Infrastructure improvements sought for public transport access to the site (DLR extension) and promotion of sustainable modes within new town centre to promote a more sustainable pattern of movement across the site (INF1, INF2)
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Workshop / maintenance waste (inc. hazardous) likely from depot & gasworks; significant commercial waste likely from Gallions Reach; no household waste.	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for. Economies of scale also provide an opportunity to deliver exceptional waste standards in any new development. If the waste allocation is not needed according to latest	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped) - Assess and address waste provision requirements
	Access to road network / proximity to waste	Good, <1 km to Jenkins Lane		

	facilities		capacity/apportionment calculations this would suggest the proximity principle is met already; otherwise it provides the opportunity to do so locally.	
11. To minimise and reduce flood risk	Flood zone	3	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage – particularly given the extent of impermeable surfaces. The site is wholly within flood zone 3 therefore adequate flood risk assessment with mitigation where needed and a responsive approach to site layout and design is essential.	<ul style="list-style-type: none"> - Flood risk assessment and mitigation, specifically in the layout of overall site and design of ground levels, potentially also including enhancement of any defences at the river edge - SUDS to improve local risk of surface water flooding
	CDA	No		
	TE2100 strip	Yes (small part)		
	Proportion of impermeable surface	At least 80% (GR car-parks, gasworks, depot + yard, roadways & surrounds of industrial units)		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent (Thames and Greenway)	Provided biodiversity policies as scoped are implemented, this large-scale site can be redeveloped and provide biodiversity / habitat net gain through masterplanning.	<ul style="list-style-type: none"> - Ensure no adverse impacts on neighbouring SINCS and deliver enhancements where appropriate - Re-provide at least an equivalent quantum/quality of habitat using agreed metric for biodiversity value
	Aerial review of site greening	Substantial soft landscaping and mature trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Beyond 1200m	No heritage issues are raised by the allocation of this site. Opportunity to promote better access to and enjoyment of the riverside and MOL and reduce severance and visual impact of depot uses and industrial units on site.	<ul style="list-style-type: none"> - Activate blue ribbon, and MOL policy - Activate neighbourliness and other design policies to facilitate transition and integration between uses
	Nearest Listed Building (grade)	Statutorily Listed Gallions Hotel and Locally Listed Sir Steve Redgrave bridge are within 400 metres		
	Nearest ATV	None		
	Incongruous / poor quality buildings on site	Yes – DLR depot		
	APA	No		
	Proximity to ACV	N/A		
	Potential to enhance other character assets (parks, stations etc.)	MOL, riverside access		

Alpine Way (S02)

Area	5.39 ha	Current use	Beckton Retail Park – retail sheds and large expanse of surface level car parking	Approximate Postcode	E6 6LA
Existing allocations	None		Extant permissions	None	
Existing designations	SINC (GS246 & GS257), Employment Hub (E1, Beckton)				
Proposed allocation	Mixed-Use Strategic Site		Alternative options not taken forward (see Sites OA)	<ul style="list-style-type: none"> • No allocation • Residential strategic site • Employment strategic site 	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment, and securing better integration with the wider context, particularly opportunities to better connect the site and neighbouring residential areas to the east with Beckton Town Centre Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to Convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC, to flood risk and given the likelihood of contamination. Alternatives were considered at the Issues and Options stage including a housing-only allocation that would bring some of these opportunities, but would not necessarily sufficiently compensate for the employment lost and allow for appropriate buffering of the neighbouring SIL. An employment-only allocation was also considered however, this would ignore another important part of the site's context with the potential to improve connectivity and density near the station, and may be inappropriate in any case given known highway/junction capacity issues.

Site allocation must address:

- East-west (to other residential development and bus and walking/cycling routes) and north-south (to town centre/DLR) connectivity/variation in PTAL
- Buffering of SIL/new employment-generating uses as appropriate and road
- Appropriate quantum/format/type of employment-generating uses (and what would be inappropriate as per INF5 and J1) and managed transition.
- Contamination, flood risk
- Appropriate density – significant increase compared to the status quo, with densities rising towards the station whilst taking account of the overall low rise context
- Mix to include appropriate community facilities where a local need exists, in a manner well-connected with the town centre.
- DLR/bus capacity
- Protection and enhancement of SINC

- Reference to character assets including DLR station, Beckton Alp & mature trees, APA tier 2 and Winsor Terrace ATV

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	40% most deprived	<p>Whilst re-development would entail some loss of employment and business accommodation, this would be covered by managed transition policy (J4) to mitigate the effects. Moreover, the site is located within a broader employment hub and adjacent to a SIL and town centre providing good local access to employment opportunities, with further opportunities accessible through the DLR link.</p> <p>Furthermore, the current uses are not intensive, presenting the opportunity to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to local schools and other social infrastructure in the town centre, with the scale of the site allowing for appropriate mix and choice. The scale of the site also provides an opportunity to incorporate inclusive community facilities to support local needs if necessary given the edge of centre location. Walkability across the site to connect with opportunities will be important to address the low PTAL on parts of the site.</p> <p>There may be displacement of some specialist ethnic retail, but there are other retail units available in the vicinity where this could be re-located, potentially better supporting town centre vitality and viability.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating as well as residential floor space.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	1 – 4 (poor – good) across site		
	Proximity to employment land	SIL adjacent LIL within 1200m LMUA within 1200m Within Employment Hub Town Centre Within 400m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support	Health facilities	Medical Centre and Pharmacy within 400m.	Overall the site provides a good opportunity to contribute to a	<ul style="list-style-type: none"> - Protect or replace the

healthier lifestyles		CFOA within 400m.	healthier lifestyle, provided walkability is designed in (connecting with the existing network and DLR/bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	<p>greenspace to west of the site in order to mitigate pollution.</p> <ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability - Enabling safe access to Beckton Alp is encouraged.
	Green Space	Pocket & small open space within 500m; local Park within 800m. Beckton Alp and Western parts of the site are designated as SINC.		
	Distance to nearest Town centre or local centre	Town centre adjacent/potentially within part of the site if Travelodge included		
	Sports facilities; opportunities for active travel	UEL Sports Dock is within 1200 metres; gymnastics centre within the adjacent town centre. Local walking and cycling network adjoins the site		
	Hot food Takeaway Hotspot/access to fresh healthy food	Located in a takeaway hotspot (2). Close to a town centre with good availability of fresh, healthy food		
	Noise levels	Low to medium. Low on the majority of the site, medium at the western perimeter along Woolwich Manor Way.		
	Air Quality	Not located in an AMQA		
	Likelihood of land contamination	High (Beckton Alps is known to be contaminated)		
3. To create successful neighbourhoods	Proximity to community facilities	Primary School within 400m Secondary School within 400m	<p>Large development site with great potential for place-making through master-planning, addressing the deficiencies of the existing retail park, notably local connectivity and under-use of the site.</p> <p>Proximity to town centre, high PTAL and nearby schools make this suitable for a mix of housing at 'urban' density.</p> <p>Extent of site and edge of centre location makes it suitable for a genuine mixed use development which could include appropriate community facilities (depending on capacity of existing facilities to</p>	<ul style="list-style-type: none"> - Local connectivity improvements. - Place-making through master planning, incorporating appropriate densities and mix of uses to meet local needs.
	Proximity to identified centre	Adjacent East Beckton Town Centre		
	PTAL	1 - 4 (poor - good) across site		
	Under-used / derelict land	Yes		
	Noise	Low to medium		

			meet additional local need) and employment-generating uses.	
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1 - 4 (poor - good) across site	<p>The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, any new employment generating uses and road are addressed.</p> <p>Opportunities exist to increase walkability both within the site and in the residential development to the east (better connecting it to walking/cycling routes and public transport).</p>	<ul style="list-style-type: none"> - Buffering of industrial uses and road - Walkability/local connection improvements
	Neighbouring Uses	SIL, residential, Beckton Alps green space, East Beckton Town Centre, main road.		
	Walkability	Poor - Fair		
5. To foster sustainable economic growth	PTAL	1-4 (poor – good)	<p>Loss of existing employment-generating floor space could have some negative impacts but this could be mitigated through activation of the managed transition policy. Moreover, loss of retail floor space and activation of Policy INF5 to prevent its replacement could better support the vitality and viability of existing centres.</p> <p>Allocation of this site would encourage the redevelopment of an under-performing retail park (and potentially an adjoining under-used office building, Solar House and low density hotel use to the south) to something more market appropriate if employment-generating uses are allowed for, reinforcing locational advantages including the existing strengths of the SIL and contributing to its ongoing viability.</p> <p>It is notable that there is limited opportunity to improve the performance of the existing retail park because it suffers from poor visibility, with road access shared with that to an industrial estate with considerable peak hour congestion (difficulties in merging with Woolwich Manor Road). Options would need to secure alternative access points to the site from the south west at Windsor Terrace/ Woolwich Manor Way/Tollgate Road junction, which would seek to improve connectivity between the site and the town centre. These issues may present some challenges for increased intensity of uses requiring freight transport, given only indirect access to sustainable freight modes.</p> <p>Additional population in the area would support local businesses and</p>	<ul style="list-style-type: none"> - Activation of managed transition policy - Specification of market-relevant employment floor space deployed to ensure the ongoing viability of neighbouring SIL without over-loading road capacity to handle freight. - Activation of INF5 to better support the adjacent town centre.
	Allocation likely to disrupt existing active business?/or support it?	Displaces a retail park with large retail units		
	Allocation likely to provide net additional space for business use?	Opportunities to support the economic functions of employment hub		
	Access to freight network (road / rail / water)	Reasonable access to major road network for freight (North Circular onto Newham Way); reasonable access to local wharves via the road network		

			add to the pool of local labour.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No loss of community facilities but the site incorporates a SINC on its western and southern most parts.	Good access to a range of facilities and scope within scale of site and edge of centre location to address any deficiencies arising as per INF6/8 through improving connections to larger parks, such as Beckton District Park which can be accessed via Beckton corridor.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/8).
	Sufficiency data? / Existing Provision	<p>Greenspace: Pocket & small open space within 500m; local Park within 800m. Beckton Alp and Western parts of the site are designated as SINC.</p> <p>Medical facilities: Tollgate Medical Centre within 400m.</p> <p>Education: Primary and Secondary school within 400m.</p> <p>Community facilities: St. Mark's Church & Community Centre are located within 400m of the site.</p> <p>Childcare: Beckton provides above the borough average in relation to under 5's childcare and for those in the 5-14 year age range.</p> <p>Access to other facilities by bus/DLR. Edge of centre location could justify new community facilities if needed.</p>		

	Scope for visibility/other improvements to existing facilities	No existing community facilities.		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes – potential to intensify through redevelopment	<p>Re-development in a very different format likely to limit scope for building re-use, but policies promoting re-use and recycling should be activated, and dated retail sheds are likely to be energy inefficient compared to new build as specified within the policy framework as scoped, which should include more efficient use of the land commensurate with its public transport and town centre accessibility.</p> <p>Significant local heat load provides imperative for heat network solutions; some scope for linking to ‘potential’ network depending on scale of redevelopment / progress of networks.</p> <p>Freight access for employment-generating uses would be road based with associated capacity issues even if this can connect with local wharves; this will affect the sustainability of an employment-only allocation.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use/energy efficient build - Potential connection to heat network - Employment-generating uses reliant on freight to be balanced with road/junction capacity.
	PTAL/local access to facilities	1 - 4 (poor - good) across site; good town centre access		
	Freight access by water or rail (e.g. for construction)	Reasonable access to local wharves via road network, but known junction capacity issues		
	Scope for re-use of buildings / materials	Limited, buildings are retail sheds		
	Proximity to heat network	600m to potential DH		
8. To improve air and water quality	Close to water bodies / SPZs	No	<p>SUDS as specified within the existing policy framework would improve quality of surface water run-off from what is currently a substantial area of impermeable car-parking.</p> <p>Mature trees are of particular value in this location given the air-quality impacts of the road network and nearby industrial uses, protected through activation of existing biodiversity policies.</p> <p>Cessation of a car-heavy use (out-of-town retail) has the potential to reduce traffic impacts on air quality, particularly if redevelopment makes improvements to the accessibility of sustainable modes through activation of INF2.</p>	<ul style="list-style-type: none"> - Protection of SINC / greening, specifically tree cover. - SUDS to address runoff issues - Enhance access to sustainable modes of transport
	AQMA	~300m		
	PTAL	1 - 4 (poor - good) across site		
	Likelihood of land contamination	Not known		
	Impact on trees / GS	Potential		
	Disruption of vehicle-heavy, polluting or contaminative use	Yes		
9. To increase the proportion of journeys made by sustainable modes	PTAL	3-4 (towards the town centre)	Allocation of this site for redevelopment would present the opportunity to reduce the dominance of car-based usage and better promote sustainable modes of transport, notably including improved access to the nearby Beckton DLR station, bus routes and	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel connectivity,

of transport			town centre. Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).	capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Large retail shed units (underperforming with no strategic need in this location) - likely to be high waste generator	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good, 1.5km to Jenkins Lane		
11. To minimise and reduce flood risk	Flood zone	1,2 & 3	The majority of the site is low flood risk, but it is surrounded with higher flood risk land (FZ2) and the southern / western edges intersect with FZ3, requiring activation of appropriate flood risk assessment and mitigation via policy SC3 in terms of the design and orientation of particular uses. Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage – particularly given the extent of car parking hardstanding on site and the scope to provide SUDs.	- SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	Substantial, at least 1/3 of the site is hardstanding carpark		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	~ 20% of site is SINC	Mature trees on site have significant green infrastructure value. SINC would need to be adequately protected as per INF6, SP5, SC4 and SC5 (including consideration of green grid links, appropriate improvements to public access).	- Protection and enhancement of SINC including mature trees and linear connectivity.
	Aerial review of site greening	Significant tree cover		
	Natura 2000	No		
13. To enhance character, protecting, conserving and	Nearest CA	Beyond 1200m (East Ham CA)	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site does not raise heritage issues.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Within 800m East Ham Town Hall Campus (statutory listed building)		

enhancing heritage and other character assets		Winsor Terrace (locally listed building)	The other character assets of note are the mature trees/green corridor on site, (SINC) the adjacent 'Beckton Alp' (which is a local landmark) and the nearby DLR station and Area of Townscape value. Activation of neighbourly development policies and appropriate location of employment-generating uses would help ensure compatibility between new uses and neighbouring industrial activity.	- Activate neighbourliness and other design policies to facilitate transition and integration between uses
	Nearest ATV	Within 400m ATV8 Winsor Terrace		
	Incongruous / poor quality buildings on site	yes		
	APA	Tier 2		
	Proximity to ACV	N/A		
	Potential to enhance other character assets (parks, stations etc.)	Yes		

East Ham Western Gateway (S03)

Area	0.90 ha	Current use	Demolished former community centre site, car park, former Gala Bingo (unlawful events use), Furniture Land (retail with storage behind / unlawful hotel use on first floor, some first floor resi)		Approximate Postcode	E6 1LB
Existing allocations	None		Extant permissions	None		
Existing designations	CFOA, Traffic Congestion Zone, HFT & BS hotspot, District & Small/Pocket Parks Deficiency, Access to Nature Deficiency, Licensing Saturation Zone					
Proposed allocation	Mixed Use Strategic Site (residential-led plus community)		Alternative options not taken forward (see Sites OA)	No allocation (maintain CFOA designation)		

Summary Assessment (further details in the table below)

Currently comprising an under-used site at the edge of East Ham Town Centre along a key corridor, the site could benefit from new investment, intensification and greater coherence, for the benefit of any new residents of the site and those living within the surrounding areas. Overall, compared to the status quo, mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment, supporting town centre policies by promoting consolidation of centre of town centre uses currently on the site, and securing better integration with the wider context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to heritage assets. A housing-only allocation would bring some of these opportunities, but would not necessarily reflect the loss of community floorspace and good location for re-provision of facilities that meet local need. No other allocation would fit with the site's context including its location outside of the town centre.

Site allocation must address:

- Appropriately address air quality and noise issues
- High quality design through comprehensive approach to development incorporating appropriate mix of uses, layouts, access, densities, and building heights to take account of accessible, edge of centre location while being sensitive to context, including heritage assets and key movement corridor location.
- Maintaining access to sustainable modes of transport; meet objectives for the sustainable travel opportunity area with proposals in this location
- Manages transition where loss of employment-generating uses over J4 threshold – promoting consolidation of town centre uses into the town centre.
- Mix to include appropriate community facilities to address local need, in a manner well-connected with the town centre.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>The site is located within directly adjacent to an employment hub and town centre environment providing good local access to employment opportunities. Whilst some unlawful uses exist on site, other than this employment-generating uses are those that we would seek to be consolidated into town centres to better effect in terms of their viability and vitality, but managed transition would apply where over the J4 threshold. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to local schools and other social infrastructure in the town centre. The scale and location of the site also allows for further opportunities to incorporate inclusive community facilities to support local needs. Community facilities within the allocated mix of uses reflects the loss of the community centre on site, the existing CFOA designation and hence suitability of the location for community facilities that address local needs, due to its accessibility and prominence. Compatibility between existing uses that prevail (for example the recently constructed mosque) will be achieved through the application of the neighbourly development policy.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation. This occurs to best effect if the mix of uses includes community floorspace as well as residential floor space.</p>	<ul style="list-style-type: none"> - Bolstering access to other jobs in the vicinity/ - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Activation of managed transition policy
	PTAL	3-5 (moderate-very good) across the site		
	Proximity to employment opportunities	Town Centre adjacent		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support	Health facilities	St. Bartholomew's	Overall the site provides a good opportunity to contribute	- Activate cumulative impact

healthier lifestyles		Surgery and Boleyn Medical Centre located within 400m. Located within a CFOA	to a healthier neighbourhood, provided walkability is designed in (connecting with the existing network and Underground/bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as community infrastructure provision are particular opportunities.	<ul style="list-style-type: none"> - Secure sustainable transport access and permeability
	Green Space	Local Park, Pocket Park, & SINC within 400m.		
	Distance to nearest Town or Local Centre	Adjacent to East Ham Major Centre		
	Sports facilities; opportunities for active travel	East Ham Leisure Centre within 400m. Local cycling network adjoins the site and local walking network in close proximity to the site		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Located in a hot food takeaway hotspot (3). Located adjacent to East Ham Major Centre where a wide range of fresh and healthy food outlets can be accessed		
	Noise levels	Low to Medium, medium along the southern perimeter of the site along Barking Road		
	Air Quality	AQMA Adjacent to the southern perimeter		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary School within 400m Secondary School within 800m	<p>Site is characterised by large former cinema now in use as a banqueting venue 'The White House' having previously been a Gala bingo hall; and the Hartley Community Centre which is now vacant.</p> <p>Situated on important linear gateway/key movement corridor to the west of East Ham where a high quality of design to be expected. Site faces Barking Road which new development will front and address.</p>	<ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights
	Proximity to identified centre	Adjacent East Ham town centre		
	PTAL	3-5, moderate-very good		
	Under-used / derelict	Yes		

	land		Good PTAL and central location make it appropriate for high density residential development with significant family element.	
	Noise	Low to medium		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	3-5 (moderate-very good) across the site	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix. Some potential loss of housing would be more than offset through new, better designed provision.	- Place-making through master planning, incorporating appropriate densities and mix of uses to meet local needs
	Neighbouring uses	Town centre, road, residential.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	3-5, moderate-very good	The site presents an opportunity promote a mix of uses whereby homes and community uses are provided promoting personal and community resilience within Newham. Additional population in the area and promotion of the consolidation of existing town centre uses into the town centre would support town centre vitality and viability and add to the pool of local labour.	- Activation of town centre policies would seek to promote town centre economic growth as set out in SP6, INF5 and J1.
	Allocation likely to disrupt existing active business	Yes – potentially, but few are lawful, 1 small café, and a large furniture store		
	Allocation likely to provide net additional space for business use	No, but should complement town centre viability		
	Access to freight network (road / rail / water)	Moderate		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Yes	Good access to a range of facilities and scope within scale of site and edge of centre location to address any deficiencies arising as per INF8/6 or through excellent public transport access (to larger parks e.g. Wanstead flats). Central Park is located less than 5 a five minute walk from the site.	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6). - Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. recently constructed mosque)
	Sufficiency data? / Existing Provision	<p>Greenspace: Local Park, Pocket Park, & SINC within 400m.</p> <p>Medical facilities: St. Bartholomew's Surgery, Boleyn Medical Centre.</p> <p>Education facilities: Primary School within 400m. Secondary School within 800m.</p>		

		<p>Childcare: East Ham Central provides above the borough average in relation to both under 5's childcare those in the 5-14 year age range. Access to other facilities by bus/Underground.</p> <p>Edge of centre location could justify new community facilities if needed. Central Park within 400m</p>		
	Scope for visibility/other improvements to existing facilities	Islamic centre and International Church		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes, particularly given carpark, play area, and low storey nature of existing buildings	<p>The site has been identified as having the potential for intensification (representing an efficient use of land resources) given its excellent access to facilities and transport.</p> <p>Given the range of buildings already on site there is scope for materials recovery if not building re-purposing; new build (as specified within the scoped policy framework) will be more energy efficient than current buildings.</p> <p>Opportunities for DH networks limited.</p> <p>Dense built environment / road network capacity limits freight access, with impacts for the sustainability of a solely employment-oriented allocation.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Employment-generating uses reliant on freight to be balanced against road capacity.
	PTAL / local access to facilities	3-5 (moderate-very good) / excellent (adjacent to major TC)		
	Freight access by water or rail (e.g. for construction)	Moderate access to local wharves by road, no rail freight		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	More than 1200m to existing or potential		
8. To improve air and water quality	Close to water bodies / SPZs	n/a (distant)	<p>Inclusion of SUDS as specified within the existing policy framework would improve quality of surface water run-off.</p> <p>Given lack of greening currently on site and excellent</p>	<ul style="list-style-type: none"> - SUDS to address runoff issues - Implementation of GI / biodiversity / air quality
	AQMA	Adjacent		
	PTAL	3-5, moderate-very good		

	Likelihood of land contamination	Low	transport links, allocation would not be likely to worsen air quality; redevelopment in fact provides an opportunity to incorporate more greening and other air quality responses such as orienting vulnerable uses away from the road.	<ul style="list-style-type: none"> - Maintaining access to sustainable modes of transport
	Impact on trees / GS	Negligible		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	3-5, moderate-very good	<p>Development at this location will likely have a positive impact in that it will reduce the need to travel by car to key services including community facilities and the town centre. As such it will have a positive impact in the creation of accessible mix of uses supported by public transport infrastructure.</p> <p>Community uses at this location will support the alignment of these uses with supporting infrastructure and seek opportunities to increase employment around town centres.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF5, SP1, SP2, SP3, SP6, SP8) will: <ul style="list-style-type: none"> ▪ Reduce dominance of car-based access. ▪ Improve sustainable travel connectivity, Capacity and reliability ▪ Policies as scoped seek to improve the quality of movement corridors and design principles to secure a more sustainable pattern of movement across the borough.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Residential and CF, which allocation will re-provide (albeit with potentially increased number of households)	Whilst redevelopment of the site will inevitably create some construction waste and likely lead to an increase in overall waste output (intensification), the policy framework as scoped will serve to minimise and mitigate, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Adequate, site already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	1	Given the lack of permeable surfaces / greening throughout the site at present, re-development has the potential to improve local drainage through the inclusion of SUDS as required by the scoped policy framework.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	No		

	Proportion of impermeable surface	Almost all	The site is not in a high risk flood zone; in any case development would not be allowed to worsen flood risk to any location.	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	300m to East Ham Park	Given the lack of habitat at present, allocation has the potential to improve the site's offer through activation of GI and biodiversity policies (i.e. the need to maximise opportunities for sustainable development).	- Mitigation not required but, implementation of scoped biodiversity policies
	Aerial review of site greening	Negligible		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	East Ham CA within 400m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. The other heritage asset of note is the locally listed former cinema building at the site. In addition, development of the site will affect the setting of East Ham conservation area. Redevelopment presents the opportunity to enhance the key corridors of Barking Road and Ron Leyton Way by improving enclosure.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Statutorily listed building within 400m at East Ham Campus Locally listed building present at site Gala Bingo former cinema		
	Nearest ATV	ATV6 (Cheltenham and Henniker Gardens and Rancliffe Road. Within 400m		
	Incongruous / poor quality buildings on site	Yes, some single storey/surface level carparking		
	APA	APA Tier 2		
	Proximity to ACV	No		
	Potential to enhance other character assets (parks, stations etc.)	NO		

Parcelforce (S11)

Area	18.50 ha	Current use	Disused gasworks, car park		Approximate Postcode	E3 3JH / E16 4SD
Existing allocations	LIL, Thames Tideway Tunnel Safeguarding			Extant permissions	None	
Existing designations	Partial SINC/Green Space, Employment Hub, partial Licensing Saturation Zone, Park / Access to Nature Deficiency, Listed Gasholders (Grade II)					
Proposed allocation	Inclusion of land in existing mixed use strategic site S11	Alternative options not taken forward (see Sites OA)	Retain existing strategic site boundary with no extension (land remains LIL / unallocated / green space)			

Summary Assessment (further details in the table below)

The LPR proposes the expansion of the original site to include former gasworks land and SINC to the west, up to the Lea River, and vacant industrial land to the south-east. The resulting much larger site triggers the need for an IIA. These identified underused plots (car parking, disused gasworks) should be brought within the masterplanning of the wider Strategic Site given their integral spatial relationship with it and opportunity to better deliver strategic objectives, notably the Lea River Park, heritage asset enhancement and transition between the Strategic Site and employment land. Negative impacts are insignificant given that the LIL is presently vacant, and other policies will secure appropriate green and heritage infrastructure protection and enhancement. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance. The alternative to leave the sites as at present fails to secure appropriate positive impacts.

Site allocation amendment must address:

- Lea River Park objectives including river crossings and wider connections to the Memorial Recreation Grounds/East London Cemetery;
- Provision of employment uses that complement and transition from the neighbouring industrial uses
- Protection and enhancement of SINC; net gain of biodiversity and open space; protection or re-provision of mature trees on site where possible
- Protection and enhancement of heritage assets, securing sustainable futures.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	Extension of the existing strategic site, to incorporate additional land for re-development would not result in any loss of existing employment or business accommodation, only in the release of vacant industrial land. The site is adjacent to a large area of SIL and an employment hub, providing access to local employment opportunities and the DLR and underground links provide access to	<ul style="list-style-type: none"> - Bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and
	PTAL	2-5 (poor to very good) across the site.		
	Proximity to employment land	SIL within 1200m LIL within 400m LMUA within 800m Employment Hub within 400m		

		Town Centre Within 400m	opportunities further afield. Moreover, allocation as part of a broader strategic mixed use site presents an opportunity to bring forward a mix of employment densities and varieties that should complement and link with businesses within the industrial parks adjacent. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).	neighbourly development policies - Walkability / improvements to public transport access.
	Proximity to schools	Primary within 400m Secondary within 800m	<p>Housing as part of the mix of uses on the additional area would be supported by the site's close proximity to local schools and other social infrastructure in the town centre with the scale of the site allowing for appropriate mix and choice (as per the original allocation). The scale of the site also provides an opportunity to incorporate inclusive community facilities to support local needs if necessary. Walkability across the site to connect with opportunities will be important to address the barriers to movement from the river and railway lines and the low PTAL on parts of the site.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating as well as residential floor space.</p>	
2. To support healthier lifestyles	Health facilities	West Ham Medical Centre within 400m	Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and Underground/DLR/bus access) noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice	<ul style="list-style-type: none"> - Protect the SINC which is located in the east, west and north of the site - Secure sustainable transport access and permeability
	Green Space	SINC located in the east, west and in the north of the site. Local Park within 800m.		
	Distance to nearest Town centre or local centre	West Ham local centre within 400m		

	Sports facilities; opportunities for active travel	Local cycling network adjoins the site and local walking network in close proximity to the site.	through the scale of the site, as well as employment generation are particular opportunities.	
	Hot Food Takeaway Hotspot/access to fresh healthy food	Not located in a hot food takeaway hotspot. A limited amount of fresh, healthy food is available from West Ham local centre. Canning Town Centre is located within 1200m and provides access to a number of outlets where fresh, healthy food is available.		
	Air Quality	AQMA along the eastern perimeter of the site		
	Noise levels	Low levels of noise exposure		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	Extension to strategic site within the Arc of Opportunity close to underground station and providing a new local centre. Attractive heritage and character assets: listed gasholders and riverside setting offer opportunities for placemaking, including delivery of Lea River Park aspirations. Adjacent employment uses create opportunity for local employment, but also require appropriate consideration of neighbourliness in terms of layouts and buffering of industrial uses.	- Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights; and mix of uses to meet local needs.
	Proximity to identified centre	West Ham local centre within 400m		
	PTAL	2-5 (poor to very good)		
	Under-used / derelict land	Yes		
	Noise	Low		
4. To ensure people have access to a choice of good	PTAL	2-5 (poor to very good)	The site's context and scale would support an extension of the existing allocation that allows for further provision of a choice of new quality housing within the mix, providing any	- Buffering of industrial uses. - Walkability/local connection improvements
	Neighbouring uses	Railways (north and east); Small green spaces & Leaway (south and west);		

quality housing that meets their needs		SIL (south); Strategic Site Allocation S10 (north);	negative impacts of the SIL, and any new employment generating uses are addressed.	
	Walkability	Poor	Opportunities exist to increase walkability within the broader site (better connecting it to walking/cycling routes and public transport).	
5. To foster sustainable economic growth	Allocation likely to disrupt existing active business	No – Results in the loss of underused land (car park) currently forming are of a LIL designation	Extension to the land at S11 would further support employment-led mixed use at this location, recognising the characteristics of the employment hub adjacent through links, complementing uses and adequate transition.	- Managed release and transition provisions.
	Allocation likely to provide net additional space for business use	Yes- Part of employment hub in which proposals would be expected to contribute to the employment hub at this location.	Extension would result in the loss part of an underused part of the LIL designation (LIL 1) but as part of the wider strategy under S11 in which employment uses would be sought at this location. Extension to this boundary would improve overall quality of the employment environment at this location in a masterplanned way.	
	Access to freight network (road / rail / water)	Road access (road off Stephenson street) to the site is good given the surrounding employment uses. Extension to the boundary would improve the sites freight access via water (River lea) to the west.	The site is adjacent to SIL/Employment hub in which intensification of employment uses and additional population in the area which can support economic development in West Ham including access to local employment opportunities, expenditure in West Ham and add to the pool of local labour.	
	Loss of community facility or open space	None		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Sufficiency data? / Existing Provision	Green space: SINC located in the east, west and in the north of the site. Local Park within 800m. Located in a district Parks deficiency area. Medical facilities: West Ham Medical Centre.	Good access to a range of facilities, and scope to improve this through enhanced scale of site. Potential to deliver community uses on site as part of the wider offer, subject to demonstrated local need and other policy considerations.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/7/8).

		<p>Education facilities: Primary and Secondary School located within 400m.</p> <p>Childcare: Canning Town North provides above the borough average in relation to childcare for both under 5s and those between 5 & 14.</p>		
	Scope for visibility/ other improvements to existing facilities	No existing facilities		
	Re-use / intensification of previously developed / underused land	Yes		
7. To promote resource-efficient development, design and construction	PTAL / local access to facilities	2-5 (poor to very good)	<p>Bringing the additional land into S11 facilitates a more coherent / master-planned approach to its future use, benefitting outcomes in terms of land use efficiency. These underused plots (car parking, disused gasworks) should be brought back into use given their desirable location close to a significant transport hub (West Ham) and proximity to metropolitan centre (Stratford).</p> <p>Given the cleared sites in the additional portions there is limited scope for building re-use but policies promoting re-use and recycling of materials should be activated.</p> <p>The site is close to existing and potential DH networks, connection should be made given the scale of redevelopment feasible.</p> <p>Freight access for employment-generating uses would be road based with associated capacity issues; this would affect the sustainability of an employment-only allocation.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Connection to heat network - Employment-generating uses reliant on freight to be balanced with road capacity.
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via the road network		
	Scope for re-use of buildings / materials	No		
	Proximity to heat network	<1k existing, <500m potential		
	Close to water bodies / SPZs	River Lea / no		
8. To improve air and	AQMA	Yes	The policy framework as scoped would ensure no harm to	- Protection / re-provision /

water quality	PTAL	2-5 (poor to very good)	<p>waterbodies, the opportunity to incorporate SUDS (as specified by policy) would improve the quality of surface water run-off. Given the industrial heritage of these sites adequate investigation and remediation of land contamination is essential.</p> <p>Disruption of the car-park use may serve to reduce vehicle journeys in the area, with potential benefits for air quality. The site has excellent PTAL at the eastern end, and given the existing allocation the addition of these lands is unlikely to add to the proportion of journeys made by private vehicle (the main contributor of airborne pollutants).</p> <p>Whilst the site is currently partially greenspace with mature trees, allocation will specify green open space provision as part of the Lea River Park vision. Allocation therefore provides the opportunity to enhance the air quality positive impacts of the site.</p>	<p>enhancement of SINC / green space specifically including mature tree cover</p> <ul style="list-style-type: none"> - Implementation of SUDS - Enhance access to sustainable modes of transport across the site
	Likelihood of land contamination	High		
	Impact on trees / GS	Yes		
	Disruption of vehicle-heavy, polluting or contaminative use	Partial (car-parking)		
	PTAL	2-5 (poor to very good)		
9. To increase the proportion of journeys made by sustainable modes of transport	Are existing uses high waste generators	No	<p>Extension of this site would present an opportunity to reduce the dominance of car-based activity and better promote sustainable modes of transport. Extension would result in the loss of a car park, but given the highly accessible nature of part of the site close to the DLR network, the boundary review presents an opportunity to reduce the proportion of journeys to and from this area by car.</p> <p>As a strategic site any proposal would be expected to address cumulative impacts of traffic and congestion and promote sustainable travel (part of site within STOA) as a key component to increase the number of journeys by sustainable modes. Further to this intensification of this site would seek measures to improve walking and cycling given the sites proximity to designated green space and</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability

			the Lea River Park. Additional connections across the railways at West Ham are also expected, linking to the wider area and to the strategic site to the north (S10: Abbey Mills).	
10. To minimise the production of waste across all sectors and promote the proximity principle	Access to road network / proximity to waste facilities	Good, area already served by LBN waste collection	The addition is unlikely to create any change as compared to the existing S11 position. Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate (both in construction and ongoing use) with the scope to design in efficient waste management.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped).
	Flood zone	Primarily FZ1 but immediately adjacent to FZ2/3, with parts of the carpark area falling into high risk		
11. To minimise and reduce flood risk	CDA	Along the eastern edge / jubilee line (carpark site)	<p>Additions would not significantly change impacts as compared to existing S11 allocation. Permeable green surfaces serve a drainage function at present but will be re-provided.</p> <p>Requires activation of appropriate flood risk assessment and mitigation via policy SC3 in terms of design and orientation of particular uses.</p> <p>Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through the inclusion of SUDs.</p>	<ul style="list-style-type: none"> - Re-provision of green space - SUDS to improve local flood resilience - Flood risk assessment and mitigation
	TE2100 strip	Yes		
	Proportion of impermeable surface	~ Half		
	Proximity to SINC	Within site and adjacent		
12. To enhance and protect existing habitats and biodiversity	Aerial review of site greening	Significant provision of mature trees in riverside location	<p>Given the greenspace / SINC designations within the site, allocation will specify protection as far as appropriate and re-provision / enhancement where changes are necessary; particularly as the site forms part of the vision for Lea River Park.</p> <p>Policy framework as scoped will serve to protect and enhance overall biodiversity and habitat offer.</p>	- Protection and enhancement of SINCS, protection/re-provision of mature trees as far as possible
	Natura 2000	No		
	Nearest CA	Stratford St John CA within 1200		
13. To enhance character, protecting,	Nearest Listed Building (grade)	Seven Victorian gasholders Grade II on site.	Development of the site will require standard archaeological investigation for APA Tier 3 as per Policy	- Protection and enhancement of heritage and character

conserving and enhancing heritage and other character assets	Nearest ATV	ATV5 All Saints Church within 800m	SP5/5a. The listed gasholders at the site are large and imposing structures. Development of the site may entail their modification, with implications for this objective, but this would be managed through existing design and heritage policies. Development of the site has enormous potential to landscape and enhance the banks of the Channelsea River and the River Lea. It can also improve the setting of West Ham station and local centre.	assets described. Presence of seven large listed gasholders on site will present particular development challenges.
	Incongruous / poor quality buildings on site	No		
	APA	Tier 3		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes. Riverside location and setting of West Ham underground station		

Limmo (S18)

Area	7.66 ha	Current use	Station, bus stop, green space and paved access areas/roads		Approximate Postcode	E16 1DG/ E16 4SA
Existing allocations	None		Extant permissions		None	
Existing designations	Partial town centre, partial SINC, Flood Zones 2 & 3, AQMA, Local Parks Open Space Deficiency, District Parks Open Space Deficiency, Traffic Congestion Zone, Hot Food Takeaway 400m Concentration					
Proposed allocation	Inclusion in existing mixed use strategic site S18	Alternative not taken forward (see sites OAs)	Retain existing strategic site boundary with no extension (land remains unallocated / green space)			

Summary Assessment (further details in the table below)

The LPR proposes the expansion of the original site to include the SINC along the south of the peninsula, and the Canning Town Station and bus stop to the north. The resulting much larger site triggers the need for an IIA. These plots (car parking, disused gasworks) should be brought within the masterplanning of the wider Strategic Site given single public land ownership (TfL) and engagement with landowner indicating interest to develop the bus stop within the plan period, and to integrate the SINC as part of the delivery of the Lea River Park aspect of the Limmo site. The extensions have an integral spatial relationship with the current Limmo allocation, and provide opportunity to better deliver strategic objectives, notably the Lea River Park, and increased connectivity and integration between Limmo and Canning Town town centre. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, spatial integration and connectivity, sustainable travel, and wider environmental performance. The alternative to leave the sites as at present fails to secure appropriate positive impacts from expected cumulative development of Limmo and Canning Town bus stop.

Site allocation amendment must address:

- Lea River Park objectives including river crossings and substantive green open space;
- Connectivity across rail lines to Canning Town town centre, including through 24h access through Canning Town Station; enhanced walking and cycling;
- Enhancements to Canning Town Station and town centre, through mix of uses as well as quality of design;
- Protection and enhancement of SINCs; net gain of biodiversity and open space; protection or re-provision of mature trees on site where possible.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	40% most deprived	<p>Extension of the existing strategic site, to incorporate additional land for re-development would not result in any loss of existing employment or business accommodation. The site is adjacent to a large area of SIL and an employment hub, providing access to local employment opportunities and the DLR and underground links provide access to opportunities further afield. Moreover, allocation as part of a broader strategic mixed use site presents an opportunity to bring forward a mix of employment densities and varieties. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of the mix of uses on the additional area would be supported by the site's close proximity to social infrastructure in the town centre with the scale of the site allowing for appropriate mix and choice (as per the original allocation). The scale of the site also provides an opportunity to incorporate inclusive community facilities to support local needs if necessary. Walkability across the site to connect with opportunities will be important to address the barriers to movement from the river and railway lines and the low PTAL on parts of the site.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if the mix of uses includes employment-generating as well as residential floor space.</p>	<ul style="list-style-type: none"> - Bolstering access to other jobs in the vicinity - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	0-6a (worst to excellent) across the site.		
	Proximity to employment land	SIL within 400m LIL beyond 1200m LMUA within 200m Employment Hub within 400m Within Town Centre		
	Proximity to schools	Primary within 800m Secondary beyond 1200m		
2. To support	Health facilities	St Luke's Medical Centre within 400m	Overall the site provides a good opportunity to contribute	- Protect the SINC which is

healthier lifestyles	Green Space	SINC located in the south and east of the site. Local Park within 400m.	to a healthier lifestyle, provided Lea River Park aspiration for the site is delivered, walkability is designed in (connecting with the existing network and Underground/DLR/bus access) noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.	located in the south and east of the site - Secure sustainable transport access and permeability
	Distance to nearest Town centre or local centre	Partially within Canning Town Town Centre		
	Sports facilities; opportunities for active travel	Local cycling network adjoins the site and local walking network in close proximity to the site. Keir Hardie Recreation Ground within 400m		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Partially located in a hot food takeaway hotspot. Canning Town Centre provides access to a number of outlets where fresh, healthy food is available.		
	Air Quality	AQMA along the eastern perimeter of the site		
	Noise levels	Low levels of noise exposure		
	Likelihood of land contamination	Low		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	Extension to strategic site within the Arc of Opportunity close to underground station. Location suggests potential for tall buildings. Attractive heritage along barking Road and riverside setting offer opportunities for placemaking. Proximity to underground station, town centre as well as Stratford Metropolitan make this site suitable for a mix of uses including family housing, town centre uses, and green, hi-tech and creative industries. Same characteristics indicate the site could be developed at a high density.	- Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights; and mix of uses and infrastructure to meet local needs.
	Proximity to identified centre	West Ham local centre within 400m		
	PTAL	0-6a (worst to excellent) across the site.		
	Under-used / derelict land	No		
	Noise	Low		

4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	0-6a (worst to excellent) across the site.	<p>The site's context and scale would support an extension of the existing allocation that allows for further provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, and any new employment generating uses are addressed.</p> <p>Opportunities exist to increase walkability within the broader site (better connecting it to walking/cycling routes and public transport).</p>	<ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing - Walkability/local connection improvements
	Noise	Low		
	Air Quality	AQMA along the eastern perimeter of the site		
	Walkability	No public access to SINC. Good accessibility to and across Canning Town Station.		
5. To foster sustainable economic growth	PTAL	0-6a (worst to excellent) across the site.	<p>Additional population in the area can support economic development in Canning Town town centre and adjacent LMUA and SIL/Employment hub, including expenditure in Canning Town, and add to the pool of local labour. Development is likely to improve the quality of the environment and overall walkability around Canning Town Station and across the A13/Silvertown Way junction, facilitating access to adjacent LMUA and SIL/Employment hub.</p>	
	Allocation likely to disrupt existing active business	No – no businesses on site		
	Allocation likely to provide net additional space for business use	Yes- Part of town centre, and through mixed-use allocation		
	Access to freight network (road / rail / water)	Road access to the site is good given the surrounding employment uses. Extension to the boundary would improve the sites freight access via water (River lea) to the south. No rail freight access.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	<p>Limmo site is to deliver significant green open space as part of the Lea River Park.</p> <p>Good access to a range of facilities in Canning Town town centre and wider area.</p> <p>Kier Hardie Recreation Ground is located within 400m of the site; improvements could be made to make this site more easily accessible.</p>	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6).
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC located in the south and east of the site. Local Park within 400m. Located in district parks deficiency area, and partially in local park deficiency area.</p> <p>Medical facilities: St. Luke's Medical Centre.</p>		

		<p>Education facilities: Hallsville Primary School located within 800m.</p> <p>Childcare: Canning Town South provides above the borough average in relation to childcare for both under 5s and those between 5 & 14 overall, but lacks capacity for 2 year old early education and 3 & 4 year olds free 30h/week education.</p>		
	Scope for visibility/ other improvements to existing facilities	No existing facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Bringing the additional land into S18 facilitates a more coherent /master-planned approach, benefitting outcomes in terms of land use efficiency and wider neighbourhood integration. This is a desirable town centre/edge-of-centre location close to a significant transport hub (Canning Town) and in proximity to Stratford metropolitan centre.	- Improved efficiency of land use / energy efficient build
	PTAL / local access to facilities	0-6a (worst to excellent) across the site.		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via the road network		
	Scope for re-use of buildings / materials	No		
	Proximity to heat network	Potential network links on site (southern end) and adjacent (east).		
8. To improve air and water quality	Close to water bodies / SPZs	River Lea / no	The policy framework as scoped would ensure no harm to waterbodies; the opportunity to incorporate SUDS (as specified by policy) would improve the quality of surface water run-off. Investigation and remediation of land contamination is important.	<ul style="list-style-type: none"> - Protection / re-provision / enhancement of SINC / green space specifically including mature tree cover - Implementation of SUDS - Enhance access to
	AQMA	Yes		
	PTAL	0-6a (worst to excellent) across the site.		
	Likelihood of land contamination	Low		

	Impact on trees / GS	Yes	<p>The site extension encompassing Canning Town Station and bus stop has excellent PTAL, and given the existing allocation the addition of these lands is unlikely to add to the proportion of journeys made by private vehicle (the main contributor of airborne pollutants).</p> <p>Whilst the site is currently partially greenspace with some mature trees, allocation will specify green open space provision as part of the Lea River Park vision. Allocation therefore provides the opportunity to enhance the air quality positive impacts of the site.</p>	<p>sustainable modes of transport across the site</p>
	Disruption of vehicle-heavy, polluting or contaminative use	Partial (busy bus interchange)		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	0-6a (worst to excellent) across the site.	<p>As a strategic site any proposal would be expected to address cumulative impacts of traffic and congestion and promote sustainable travel as a key component to increase the number of journeys by sustainable modes. Further to this intensification of this site and given the site's proximity to the Lea River Park, measures would seek to improve connectivity across the rail lines, and walking and cycling.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will - Improve sustainable travel connectivity, capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	<p>The addition is unlikely to create any change as compared to the existing S18 position. Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate (both in construction and ongoing use) with the scope to design in efficient waste management.</p>	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped).
	Access to road network / proximity to waste facilities	Good, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	Primarily FZ2/3, with parts of the carpark area falling into high risk	<p>Additions would not significantly change impacts as compared to existing S18 allocation. Permeable green surfaces serve a drainage function at present, and will be re-provided, enhanced and expanded.</p>	<ul style="list-style-type: none"> - Re-provision of green space - SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	Along the eastern edge / jubilee line (carpark site)		
	TE2100 strip	Yes	<p>Requires activation of appropriate flood risk assessment and mitigation via policy SC3 in terms of design and orientation of particular uses.</p> <p>Given policy framework as scoped, re-development would</p>	
	Proportion of impermeable surface	~ Half		

			not worsen flood risk to any location and has the potential to improve local drainage through the inclusion of SUDs.	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within site and adjacent	Given the greenspace / SINC designations within the site, allocation will specify protection as far as appropriate and re-provision / enhancement where changes are necessary; particularly as the site forms part of the vision for Lea River Park. Policy framework as scoped will serve to protect and enhance overall biodiversity and habitat offer.	- Protection and enhancement of SINC's, protection/re-provision of mature trees as far as possible
	Aerial review of site greening	Some mature trees adjacent Canning Town Station.		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Sugar House Lane CA beyond 1200	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5. Development of the site has enormous potential to landscape and enhance the bank of the Lea River. It can also improve the setting of Canning Town station and town centre.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Canning Town library Grade II within 400m		
	Nearest ATV	ATV7 Barking Road West within 200m		
	Incongruous / poor quality buildings on site	No		
	APA	Tier 2		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes. Riverside location and setting of Canning Town station		

Queens Market Amendment (S27)

Area	1.90 ha	Current use	Hamara Ghar (9 storey residential block including older people's housing + small shops on ground floor), 2 - level carpark		Approximate Postcode	E13 9BA / 9JN
Existing allocations	None		Extant permissions	No		
Existing designations	Partial PSF / Town Centre / Employment Hub, BS/HFT concentration, Licensing Saturation Zone, Access to Nature Deficiency					
Proposed allocation	Inclusion of site within existing mixed use strategic site S27		Alternative options not taken forward (see Sites OA)	Retain existing strategic site boundary (without extension)		

Summary Assessment (further details in the table below)

Incorporating the additional plots into strategic site S27 would facilitate a more coherent / masterplanned approach to the development of this key town centre location, benefitting outcomes in terms of land use efficiency and delivery of a well-integrated mixed use site. Overall, compared to the status quo, mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment, making better use of the site as part of a wider development area that includes strategic transport investment, and securing better integration with the wider context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and to manage transitional effects. A housing-only allocation would bring some of these opportunities, but would not necessarily adequately reflect the town centre location and opportunity. An employment-only allocation would not be compatible with the loss of housing and the policy acknowledgement that residents bring benefits to town centre vitality and viability.

Site allocation must address:

- Activate cumulative impact policies to reduce the number of hot food takeaways and betting shops in the area
- High quality design through masterplanning incorporating appropriate mix of uses, layouts, access, densities, and building heights to take account of key location while being sensitive to context.
- Ensure the re-provision of a viable market as a prominent feature of the site.
- Re-provision of specialised housing floorspace
- Enhancing access to sustainable modes of transport;
- Mix to include a health facility and other appropriate community uses where a local need exists.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>The site itself is located within a broader employment hub and town centre, providing local access to employment opportunities and ensuring access to opportunities further afield via the adjacent underground station. Whilst re-development would entail some initial loss of commercial floorspace on the broader side and proposed area for inclusion, re-provision/ reconfiguration would be expected via the town centre policies to mitigate effects. Furthermore, the current uses on this area of the site are not intensive, presenting the opportunity to improve densities and variety of uses that could potentially provide employment opportunities. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J1, J3, SP6, INF5 and SP8).</p> <p>Housing as part of the mix of uses would be supported by the site's close proximity to local schools and other social infrastructure in the town centre, with the scale of the site allowing for appropriate mix and choice. The scale of the site also provides an opportunity to incorporate inclusive community facilities to support local needs if necessary, given the location.</p> <p>Overall, the extension of the existing site allocation to include this additional area for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation is activated to address some potentially initially negative impacts. This occurs to best effect if a mix of uses are included on the wider site.</p>	<ul style="list-style-type: none"> - Activation of town centre policy/ bolstering access to town centre employment opportunities. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	6a (excellent)		
	Proximity to employment land	SIL beyond 1200m LIL beyond 1200m LMUA within 1200m Within Employment Hub Within Town Centre		
	Proximity to schools	Primary within 150m Secondary within 400m		
2. To support	Health facilities	Newham and Plashet Medical Centres within	Overall the site provides a good opportunity to contribute	- Incorporate green space into

healthier lifestyles		400m. Pharmacy within 400m.	<p>to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and underground/bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.</p> <p>The site has also been identified as suitable to provide a health facility (see IDP), further improving access to local healthcare for residents of the wider area, reinforcing the strategic role of the site. The expanded allocation facilitates delivery of this facility by providing additional site capacity and improved viability.</p>	<p>the site in order to mitigate pollution.</p> <ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC, Local and Pocket Parks within 400m. District Park within 1200m.		
	Distance to nearest Town centre or local centre	Within Green Street town centre		
	Sports facilities; opportunities for active travel	Local walking and cycling network adjoins the site		
	Hot Food Takeaway Hotspot/access to fresh, healthy food?	Located within a Hot Food Takeaway Hotspot (4). The site is located within Green street District Centre which has a wide variety of outlets from which fresh, healthy food can be accessed.		
	Air Quality	Not in an AQMA		
	Noise levels	Low levels of noise exposure		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	<p>Prime location within town centre adjacent underground station indicates that tall building/high density development would be acceptable.</p> <p>Low noise and proximity to services and schools make site suitable for significant residential component in development.</p> <p>Replacement of market and proximity of site to locally listed building present opportunities for place-making and setting of identity for Green St.</p> <p>Location of site is appropriate for town centre uses</p>	<ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights; and mix of uses to meet local needs.
	Proximity to identified centre	Within Green Street town centre		
	PTAL	6a - excellent		
	Under-used / derelict land	No		
	Noise	Low		

			including community uses at ground floor augmenting vitality and viability of centre.	
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	6a (excellent)	The existing site allocation's context and scale supports the delivery of the provision of a choice of new quality housing within the mix, and an extension of the site to include the additional identified area would allow for further intensification, providing any negative impacts such as the loss of existing housing were mitigated.	<ul style="list-style-type: none"> - Activation of housing policies to ensure re-provision of existing residential floorspace. - Walkability/local connection improvements
	Neighbouring Uses	Town centre, residential, retail.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	6a - excellent	The site is located within a broader employment hub and town centre, providing local access to employment opportunities and ensuring access to opportunities further afield via the adjacent underground station.	<ul style="list-style-type: none"> - Activation of town centre policy/ bolstering access to town centre employment opportunities.
	Allocation likely to disrupt existing active business	Yes - existing commercial uses within the town centre		
	Allocation likely to provide net additional space for business use	Yes – through boundary extension and intensification would support employment floor space	Whilst re-development would risk the loss of commercial floorspace on the broader side and proposed area for inclusion, re-provision/ reconfiguration would be expected via the town centre policies to mitigate effects.	
	Access to freight network (road / rail / water)		The boundary extension into the car park presents the opportunity to improve densities and variety of uses that could potentially provide employment opportunities. Investment more generally would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J1, J3, SP6, INF5 and SP8).	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	Good access to a range of facilities and scope within scale of site and in centre location to address any deficiencies arising as per INF6/8 or through excellent public transport access (to larger parks e.g. West Ham Park).	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/8).
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC, Local and Pocket Parks within 400m. District Park within 1200m.</p> <p>Community facilities: Library</p>		

		<p>Medical facilities: Plashet Medical Centre, Newham Medical Centre and a pharmacy located within 400m.</p> <p>Education facilities: Primary School within 400m and secondary school within 800m.</p> <p>Childcare: Boleyn provides below the borough average in relation to under 5's childcare and for those in the 5-14 year age range. However, East Ham North adjoins Boleyn and provides above the borough average in relation to both under 5s and 5-14 year age range childcare.</p>		
	Scope for visibility/ other improvements to existing facilities	None		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	<p>Redevelopment of the carpark site would constitute intensification commensurate with the location's excellent PTAL rating and access to facilities and represents a more efficient use of land.</p> <p>As with the existing allocation, policies requiring re-use and recycling should be activated. New build (as specified within the scoped policy framework) is likely to be significantly more energy efficient than the dated Hamara Ghar building, with mid to long term benefits for resource use.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Employment-generating uses reliant on freight to be balanced with road capacity
	PTAL / local access to facilities	Excellent		
	Freight access by water or rail (e.g. for construction)	Moderate		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	> 1000m to existing or potential		

			Freight access for employment-generating uses would be road based with associated capacity issues, affecting the sustainability of an employment-only allocation in this excellent PTAL location.	
8. To improve air and water quality	Close to water bodies / SPZs	No	Inclusion of SUDS as specified in the scoped policy framework provides the opportunity to improve the quality of surface water run-off.	<ul style="list-style-type: none"> - Activation of biodiversity / GI policies and air quality requirements - SUDS to address runoff issues - Maintain access to sustainable modes of transport
	AQMA	No but whole borough likely to be designated		
	PTAL	6a (excellent)	<p>Given the already-developed nature of the land and complete lack of greening, allocation is unlikely to lead to any worsening of air quality (particularly given the site's excellent PTAL) and provides the opportunity to deliver improvements through incorporate of mature trees / designed responses to poor air quality.</p> <p>Disruption of the carpark use may serve to reduce the number of cars / journeys by car in the local area and town centre, with associated benefits for air quality.</p>	
	Likelihood of land contamination	Normal		
	Impact on trees / GS	None		
	Disruption of vehicle-heavy, polluting or contaminative use?	Potential (redevelopment of car park)		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	6a – excellent	<p>The sites excellent access to sustainable travel presents opportunities to support this objective including walking and cycling and improved access (step free) to the underground station.</p> <p>The boundary extension to include the carpark site would present opportunities to intensify this area commensurate with the location's excellent PTAL rating and access to facilities and represents a more efficient use of land. This in turn would seek to better utilise the sites access to sustainable travel modes and seek to reduce the numbers of journeys made by car to the town centre.</p>	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability - Activation of INF1,INF2, SP6, SP7 and INF5 policies would support this objective.

10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Large number of households, carpark would not generate significant waste	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	1	Given the policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through inclusion of SUDS, specifically given the extent of impermeable surface at present and proximity of an identified CDA.	- SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	Adjacent		
	TE2100 strip	No		
	Proportion of impermeable surface	Total		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC		Given the existing allocation, the proposed extension creates no additional potential for impact on SINCS. Redevelopment provides the opportunity to activate biodiversity policies and provide more than the present offer.	- No mitigation required however activation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Woodgrange CA within 1200m	Development of site can enhance setting of nearby locally listed buildings at and around station. Apart from the above development of site does not raise heritage issues.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Upton Park Station and Station Parade locally listed within 400m		
	Nearest ATV	ATV5 All Saints Church within 1200m		
	Incongruous / poor quality buildings on site	Yes		
	APA	No		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes. Upton Park station and precinct.		

Plaistow North (S29)

Area	3.23 ha	Current use	Vacant buildings, car park, small shopping parade	Approximate Postcode	E13 0AJ/OAT
Existing allocations	S29, HSG14		Extant permissions	17/00951/FUL	
Existing designations	Licensing Saturation Zone, Traffic Congestion Zone, BS & HFT Hotspot, Tier 2 APA, Local Park Deficiency				
Proposed allocation	Mixed use including local centre		Alternative options not taken forward (see Sites OA)	Do not allocate/retain existing separate allocations and potential windfall site	

Summary Assessment (more details in the table below)

The LPR proposes the expansion of the original site to include Plaistow Station, housing allocation HSG14 and further land at Winifred Terrace, to bring together related development opportunities in a coherent way. The resulting much larger site triggers the need for an IIA. Following Ford vacating the site, there are currently limited employment generating uses, and mostly vacant sites. The site could benefit from investment, intensification and reconfiguration to yield a more varied offer that would include a new local centre as focal point for the local community. Overall, compared to the status quo, and less ambitious non-strategic site allocations, large-scale mixed use allocation could support employment and housing, place-making and sustainable communities objectives, including local environmental improvements, through helping to bring forward comprehensive masterplanned development on site to make best use of it and local character assets, and securing better opportunities for delivering a local centre around the station. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to the SINC/MOL along the railway and Greenway, to flood risk and given the possibility of contamination on the Ford site. The alternative to leave the sites as at present fails to secure appropriate positive impacts.

Site allocation must address

- Land contamination, flood risk (zone 3 and critical drainage area, TE2100 zone) and air quality issues.
- High quality design incorporating appropriate densities, mix of uses, and building heights to take account of accessible location in a local centre (new), and to enhance the setting of heritage assets, managing integration and neighbourliness.
- Appropriate layout, and mix and quantum of town centre uses.
- Mix to include appropriate community facilities where a local need exists, in a manner well-connected with the local centre.
- Protection and enhancement of the neighbouring SINC (Greenway and land along the railway)
- Sustainable transport access and permeability through appropriate walking and cycling environments and step-free access to the station;

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>As the current uses are not intensive, an opportunity exists to improve employment densities and variety, adding to existing employment base in adjacent LMUA. The delivery of a new Local Centre as part of the allocation will further support local employment and provide an opportunity to deliver community facilities where there is an identified local need. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Permeability/connectivity improvements across the site to connect with opportunities will be important to address existing shortfalls. Also, improvements to the station, including step-free access, will increase access to opportunities further afield.</p> <p>Overall, an allocation for development provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation, provided mitigation. This occurs to best effect if the mix of uses includes employment-generating, community and residential floor space.</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	5 - 3 (good)		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA adjacent and within 400m Within Employment Hub (partially) Local Centre within 400m Town Centre beyond 1200m		
	Proximity to schools	Primary within 200m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	West Ham Lane Centre & Balaam Park Health Centre within 800m. CFOA further than 1200m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and rail/bus access) further takeaways are not created, noise mitigation is maintained, and localised air quality issues and any contamination dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities long term. Step-free access and other improvements to the</p>	<ul style="list-style-type: none"> - Protect the SINC which borders the site on the east and south. - Activate cumulative impact & neighbourliness policy - Secure sustainable transport access and permeability
	Green Space	Small Park adjacent to the site boundary. SINC adjacent to the site, Local Park located within 200m.		
	Distance from the	Local Centre within 400m		

	nearest Town or Local Centre		station would further contribute to a change in take-up of sustainable modes of travel.	
	Sports facilities; opportunities for active travel	Within 200m. Local walking and cycling network adjoins the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Partially located in a takeaway hotspot. Access to fresh, healthy food in Local Centre at Plaistow Road within 400m of the site. Numerous outlets are accessible via public transport.		
	Noise levels likelihood	Normal		
	Air Quality	AQMA		
	Likelihood of land contamination	Moderate		
3. To create successful neighbourhoods	Proximity to community facilities	CFOA further than 1200m; West Ham Lane Centre & Balaam Park Health Centre within 800m; Upton Centre within 800m;	The scale of the site provides important opportunities for placemaking through high quality design and layout, and incorporating appropriate densities, mix of uses to create a new focal point for the local community. Local character assets, such as the station, the Greenway, as well as nearby listed buildings and green spaces, provide further opportunities to create a unique, successful neighbourhood. Activation of neighbourly development policies and appropriate location of employment-generating uses would help ensure compatibility between new uses and neighbouring residential neighbourhoods.	<ul style="list-style-type: none"> - Walkability/local connection improvements - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights. - Activate neighbourliness and other design policies to facilitate transition and integration between uses
	Proximity to identified centre	Site will create new local centre		
	PTAL	5 - 3 (good)		
	Under-used / derelict land	Yes – vacant land and buildings; many buildings in poor condition.		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	5 - 3 (good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix. Opportunities exist to increase walkability both within the site and through to neighbouring areas through improved	<ul style="list-style-type: none"> - Walkability/local connection improvements
	Neighbouring Uses	greenspace (SINC), residential, railway, employment (LMUA).		
	Walkability	Fair		

			connectivity.	
5. To foster sustainable economic growth	PTAL	5 - 3 (good)	<p>The expanded allocation would help deliver additional employment as part of the mix of uses, focused around the new Local Centre.</p> <p>The site benefits from good access points by road and rail to support the viable operation of businesses at this location.</p> <p>Additional population in the area would support local businesses including expenditure and visitors to North Woolwich Local Centre and add to the pool of local labour.</p>	<ul style="list-style-type: none"> - Convergence and neighbourliness policies to secure active use and integration.
	Allocation likely to disrupt existing active business	Limited – part of the site includes out of centre shopping parade.		
	Allocation likely to provide net additional space for business use	Yes		
	Access to freight network (road / rail / water)	Road/rail excellent, water minimal		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	None	<p>Good access to a range of facilities and scope within scale of site and Local Centre designation to address any deficiencies arising, as per INF8/6. Improving access to the Greenway adjacent provides links to the wider grin grid network.</p>	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6). - Ensure links to the Greenway
	Sufficiency data? / Existing Provision	<p>Greenspace: Valetta Grove Amenity Area adjacent to the site, SINC adjacent to the site (along railway and the Greenway), Local Park located within 400m. District Park within 800m.</p> <p>Education facilities: Nursery within 800m, Primary School within 200m, Secondary School within 800m.</p> <p>Medical facilities: Medical centres within 400m.</p> <p>Childcare: Gap in Early Years education provision for under five year olds.</p>		

	Scope for visibility/other improvements to existing facilities?	Plaistow Station		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	<p>Given lack of development on site and/or re-development in a very different format, there is limited scope for building or material re-use other than concerning the listed station; policies promoting re-use and recycling should be activated.</p> <p>Allocation as an expanded Strategic Site as compared to a smaller strategic site, a housing site and a windfall site, may facilitate a better, more efficient use of land resources, and better integration. Redevelopment and intensification should include a more efficient use of land commensurate with its position adjacent a rail station, and given local centre designation. Development should also seek to further improve access to sustainable modes of transport, e.g. through bus/cycle network enhancements.</p> <p>Freight access for employment-generating uses would be road based with associated capacity issues even if this can connect with local wharves.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use + energy efficient build - Connection to / creation of DH network should be investigated - Employment-generating uses reliant on freight to be balanced with road capacity.
	PTAL / local access to facilities	5 - 3 (good), site includes Plaistow Station		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via road network		
	Scope for re-use of buildings / materials	Limited		
	Proximity to heat network	Within 500m to potential and 1000m to existing network		
8. To improve air and water quality	Proximity to water bodies / SPZs	None	<p>SUDS as specified within the existing policy framework could improve quality of surface water run-off, policy framework as scoped should ensure appropriate investigation and remediation of land contamination (important given the likely industrial heritage of a site in this location).</p> <p>The policy framework as scoped would seek to incorporate greening (as far as possible), with associated benefits for air quality.</p> <p>Given the currently under-used nature of the site, allocation will likely lead to an increase in number of journeys to site; development should address</p>	<ul style="list-style-type: none"> - Protection of neighbouring SINC (specifically tree cover) / activation of biodiversity / air quality policies - Inclusion of SUDS - Enhance access to sustainable modes of transport
	AQMA	Yes		
	PTAL	5 - 3 (good)		
	Likelihood of land contamination	Moderate (likely of Ford site)		
	Impact on trees / GS	Some		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		

			enhancements to sustainable modes as far as possible to minimise and mitigate any increase in private car use.	
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	5 - 3 (good)	<p>Allocation of this site would present an opportunity to reduce the dominance of car-based activity and better promote sustainable modes of transport.</p> <p>The challenges presented with this site include improved permeability north-south (including public realm improvements) for walking and cycling, and connectivity between the Greenway and the station.</p> <p>The site benefits from station and bus stops along Plaistow Road which support sustainable travel objectives (INF7) and public transport use at this location.</p> <p>Overall allocation presents a number of opportunities to have a positive impact on the promotion of journeys made by sustainable modes.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF5, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> ▪ Reduce dominance of car-based access and manage extent of freight access ▪ Improve sustainable travel connectivity, capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste in both construction and ongoing use, the policy framework as drafted will serve to minimise and mitigate as far as possible, with scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good, ~ 2km to Bywaters Recycling And Recovery Centre		
11. To minimise and reduce flood risk	Flood zone	3/2/1	<p>The site is partially within flood zone 3 therefore adequate flood risk assessment (with mitigation where needed) and a responsive approach to site layout and design is essential.</p> <p>Given policy framework as scoped, re-development should not worsen flood risk to any location. Whilst the greening of the currently unused parts of the site is likely to offer good drainage at present, the inclusion of SUDS and use of permeable surfaces means redevelopment can be delivered without increasing the risk of surface water</p>	<ul style="list-style-type: none"> - SUDS to address local flood resilience - Flood risk assessment and mitigation
	CDA	Yes		
	TE2100 strip	No		
	Proportion of impermeable surface	>90%		

			flooding.	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent (along railway, and Greenway)	Whilst the limited greenspace in this location is undesignated and does not therefore have to be maintained/re-provided in equivalent quantum and quality, the mature trees on site will have significant green infrastructure value and should be protected/re-provided as far as possible as per the scoped policy framework (currently SC5). The adjacent SINC's should be adequately protected /enhanced as per INF6, SP5, SC4 and SC5 (including consideration of green grid links and appropriate improvements to public access).	- Protection and enhancement of neighbouring SINC's, protection / re-provision of mature trees as far as possible
	Aerial review of site greening	Minimal		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Beyond 1200m (Three Mills CA)	Location within archaeological priority area and presence of statutory listed buildings raise significant heritage considerations. Given partial location within APA, site will require investigation as per policy framework, where relevant. Presence of statutory listed buildings present opportunities for high quality design initiatives to enhance their setting and secure viable future uses for them.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	On site: Plaistow Station (locally listed). Adjacent: Willow Cottage (grade II)		
	Nearest ATV	ATV5 Church Street North Within 800m		
	Incongruous / poor quality buildings on site	Some		
	APA	Tier 2 APA		
	Proximity to ACV	Within 800m		
	Potential to enhance other character assets (parks, stations etc.)	Yes – station, Greenway, adjacent small park.		

Limited Amendments to Existing Strategic Sites (S05, S08, S13, S14, S15, S21, S25, S28, S30)

Summary Assessment (further details in the table overleaf)

The limited and positive changes proposed to these existing strategic sites are required in order to clarify aspirations or respond to new localised opportunities as outlined in the table below. Opportunities presented through the limited and positive amendments and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, spatial integration and connectivity, sustainable travel, and wider environmental performance. The alternative to leave the sites as at present fails to secure appropriate positive impacts from expected cumulative development.

Strategic Site	Area (ha)	Changes Proposed
S05: Stratford Central	21.32	<ul style="list-style-type: none"> Review retail strategy towards more limited growth, in line with expected trends Clarify that parity of environmental quality with Stratford City and the surrounding Olympic Legacy sites is required, including continuity of public realm Added need for adequate consideration of local character, including Conservation Area and listed buildings
S08: Thames Wharf	11.30	<ul style="list-style-type: none"> Clarify that a local centre is proposed around the new DLR station, including community uses; Clarify strategy for release of wharf; Add need for contribution to Lea River Park by providing connections to Canning Town Town Centre and to Royal Victoria Docks; Add need for transformation of North Woolwich Way into an 'activity street' promoting walkability and comfortable cycling environment, activated by other uses and green/open space.
S13: Manor Road	3.71	<ul style="list-style-type: none"> Clarify need for a high quality, prominent green space Require a considered response to land adjacent the railway and under pylons to avoid their marginalization Include 'gateway' role as part of Canning Town Town Centre and afferent 'tallest buildings area', through function and form Included need for improved cycling experience
S14: Canning Town Central	8.12	<ul style="list-style-type: none"> More explicit reference to town centre uses and provision of workspace
S15: Canning Town East	9.74	<ul style="list-style-type: none"> Specific reference added to the listed Chapel of St George and St Helena to mark its wider significance
S21: Silvertown Quays	20.96	<ul style="list-style-type: none"> More explicit reference to improved connection across the dock to the ExCel centre, marking the opportunity to improve the existing foot bridge from adjacent Royal Victoria Bridge Add need for transformation of North Woolwich Way into an 'activity street' promoting walkability and comfortable cycling environment, activated by other uses.
S25: East Ham Market	2.20	<ul style="list-style-type: none"> More explicit reference to the need to improve east-west connectivity through the site, as well as public environment improvements along Barking Road and Ron Leighton Way key corridors.

S28: Custom House/Freemasons Road	4.44	<ul style="list-style-type: none"> Boundary expanded to include the hotel site as part of the opportunity presented through Crossrail intensification and redevelopment of the town centre.
S30: Royal Victoria West	4.97	<ul style="list-style-type: none"> Added protection for existing green space by the Crystal, to support clarification that the site represents the terminus of the Lea River Park.

Site allocations amendment must address:

- Lea River Park objectives including river crossings and other connectivity improvements, and green open space;
- Enhanced walking and cycling; new connections between sites, including across dock and busy roads and the transformation of key movement corridors
- New local centres and improved town centres as part of the wider town centres strategy.
- Protection and enhancement of SINCs; net gain of biodiversity and open space; protection or re-provision of mature trees on site where possible

IIA Objective	Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	<p>Release Thames wharf as part of S08 has already informed the existing site allocation, with the proposed change reflecting increased certainty regarding preferred strategy for consolidation at Royal Primrose wharf. Whilst re-development would entail some loss of employment and business accommodation, this would be covered by managed transition policy (J4) to mitigate the effects. Mix of uses proposed for the site, including as part of a new local centre, will provide new jobs opportunities, complemented by local access to employment opportunities in the area more widely.</p> <p>Amendments to other sites have limited bearing on this objective, with the exception of requirements to improve to connectivity which would facilitate access to wider opportunities (S08, S13, S21, S25, S30).</p>	<ul style="list-style-type: none"> - Bolstering access to other jobs in the vicinity - Activation of neighbourly development policies - Activation of town centre policy
2. To support healthier lifestyles	<p>Overall the amendments provide a good opportunity to contribute to a healthier lifestyle, through supporting delivery of Lea River Park (S08, S30) and other green spaces (S13), enhanced connectivity, walkability and cycling experience (S08, S13, S21, S25, S30), and urban realm improvements (S05).</p> <p>More explicit reference to community facilities (S08, S13, S27) further contributes to this objective by responding to local needs.</p>	<ul style="list-style-type: none"> - Protect and enhance the SINCs where appropriate - Secure sustainable transport access and permeability
3. To create successful neighbourhoods	<p>Amendments proposed seek to strengthen and optimise local positive character aspects including heritage and green space (S05, S08, S13, S15, S30), improve connectivity and activation of key streets (S08, S13, S21, S25, S30), and bring together interconnected local development opportunities (S21, S28). All of these make a positive contribution to successful neighbourhoods through comprehensiveness, better placemaking, and</p>	<ul style="list-style-type: none"> - Place-making through high quality design and layout; and mix of uses and infrastructure to meet local

	optimisation of new and existing town/local centres.	needs while considering neighbourliness.
4. To ensure people have access to a choice of good quality housing that meets their needs	The limited amendments would have a positive indirect impact on this objective, by contributing to improved residential amenity (all) and access to local services and facilities (S08, S13, S14, S28). Clarified references to connectivity requirements support walking and cycling (S08, S13, S21, S25, S30).	- Place-making through high quality design and layout Walkability/local connection improvements
5. To foster sustainable economic growth	Improved quality of public realm (S13) , including parity of quality in Stratford (S08), would help revitalise Canning Town town centre and Stratford Metropolitan, and incentivise further investment. Elsewhere, better connectivity and creation of new local centres around stations (S08, S21, S28) will foster local economic growth. Canning Town Central (S14) allocation further support this objective by making new provision for workspace.	- Activation of town centre policy
6. To ensure inclusive access to a range of high-quality community facilities and open space	Several of the proposed amendments include explicit references to the need for community facilities (S08, S13) and/or open space (S08, S30). Application of relevant policies would ensure these respond to local need and are inclusive, accessible, and well designed and integrated overall. Also, proposals for improved connectivity (S08, S13, S21, S25, S30) would facilitate better access to existing facilities in the wider area.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6). -
7. To promote resource-efficient development, design and construction	The limited amendments proposed do not address this objective.	- Improved efficiency of land use / energy efficient build
8. To improve air and water quality	Amendments protecting or enhancing green space (S13, S30) would contribute to air quality and filtration of rainwater. Amendments requiring improved connectivity, walkability and cycling (S08, S13, S21, S25, S30) would further support sustainable transport, leading to improvements in air quality. Release of wharves from S08 and consolidation at Primrose/Peruvian Wharves will support improvements in air quality by promoting further transfer from road to water freight through improved wharf capacity, and additionally by optimising existing operations.	- Protection / re-provision / enhancement of SINC / green space specifically including mature tree cover - Implementation of SUDS - Enhance access to sustainable modes of

	Notwithstanding the above, the implementation of the Silvertown Tunnel as per current DCO has the potential to negatively impact on S08 and S30, in terms of air quality through increased traffic, pedestrian realm severance, and reduced quality of cycling environment.	transport across the site, including through mitigation of effects of large infrastructure (roads, railway)
9. To increase the proportion of journeys made by sustainable modes of transport	Amendments requiring improved connectivity, walkability and cycling (S08, S13, S21, S25, S30) would further support sustainable transport.	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will - Improve sustainable travel connectivity, capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	The proposed amendments would not impact on this objective.	
11. To minimise and reduce flood risk	<p>The limited amendments would not significantly change impacts as compared to existing allocations. Where additional green space requirements are included (S13, S30), they serve an additional local drainage function.</p> <p>Overall, given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through the inclusion of SUDs.</p>	<ul style="list-style-type: none"> - Re-provision of green space - SUDs to improve local flood resilience - Flood risk assessment and mitigation
12. To enhance and protect existing habitats and biodiversity	Proposals for green space (S13, S30), for contributions to the Lea River Park (S08, S30), and for the transformation of North Woolwich Way into an 'activity street' (S21, S08) all promote improvements to habitats and biodiversity, not least through new creating green grid linkages.	<ul style="list-style-type: none"> - Protection and enhancement of SINCs, protection/re-provision of mature trees as far as possible
13. To enhance character, protecting, conserving and enhancing heritage	Limited amendments proposed for S05 and S15 include more explicit references to local heritage assets, supporting their activation, integration and protection. Further, the requirement for parity of quality and continuity in the public realm of Stratford (S05) would help integrate old and new in a cohesive way.	<ul style="list-style-type: none"> - Protection and enhancement of heritage and character assets described.

and other character assets	Requirements for contributions to Lea River Park (S08, S30), coupled with the release of Thames Wharf, would achieve further access, activation and enhancement of the Lea and Thames riversides as important local and regional character assets.	
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Hartington Close/ Vandome Rd (HSG14)

Area	0.33 ha	Current use	Residential	Approximate Postcode	E16 3NP/3SA/ 3NA
Existing allocations	Tier 3 APA		Extant permissions	TBC	
Existing designations	Part greenspace (Hartington site), access to nature / parks deficiency, licensing saturation zone, HFT concentration				
Proposed allocation	Non-strategic residential		Alternative options not taken forward (see Homes OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the sites' location within a residential context, a housing allocation could support housing and place-making/sustainable community objectives, including local character improvements, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address

- High quality design that incorporates the appropriate housing mix and densities and achieves positive impacts on the site's surroundings, optimising the site's potential whilst being sensitive to local context.
- Flood risk (via appropriate investigation).
- Consideration of on site greenspace.
- The securing of sustainable transport access and site connectivity and permeability.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty	LSOA IMD?	10% most deprived	Given the proximity to employment land the site has some	- Activation of housing mix
	PTAL	2-3 (poor-moderate)		

and promote equality of opportunity	Proximity to employment land	SIL within 1200m LIL within 800m LMUA beyond 1200m Employment Hub within 400m Town Centre within 1200m	local access to employment opportunities, with those further afield accessible through adjacent the DLR links (further increased by Crossrail's commencement in 2018). Redevelopment would not involve the loss of any existing employment land, and investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, and SP8). Intensification of housing on site would be supported by the proximity to local schools supporting local needs. Overall, an allocation provides the opportunity to reduce poverty and promote further equality of opportunity particularly in an area of high deprivation.	and choice, convergence and neighbourly development policies.
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Custom House Surgery and pharmacy located within 400m.	Overall the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix.	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability - Protect or replace the greenspace on the site in order to mitigate pollution.
	Green Space	Intersecting with a Pocket Park, SINC and Local Park within 400m and MOL 1200m.		
	Distance to nearest town or local centre	Local Centre within 400m.		
	Sports facilities; opportunities for active travel	Peacock Gym and Newham Leisure Centre within 1200m. Local cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food?	Located in a hot food takeaway hotspot (2-3).		
	Noise levels	Low		
	Air Quality	Not located in an AQMA		
	Likelihood of land contamination	Normal		
3. To create	Proximity to community facilities	Primary school within 400m	This site provides a good opportunity to create a successful	- Activate Successful Places

successful neighbourhoods		Secondary school within 800m	neighbourhood provided noise mitigation is maintained and walkability is designed in. The site is well connected, it is within a five minute walk of Custom House DLR station and adjacent to Freemasons Road local centre. In addition, Canning Town District Centre is within a fifteen minute walk of the site. These connections ensure that the site has good access to a range of facilities. The site offers the opportunity to improve local housing mix and choice in an appropriate location while ensuring that these sites are configured in the most efficient manner.	<ul style="list-style-type: none"> - policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Custom House local centre within 400m		
	PTAL	2-3 (poor-moderate)		
	Under-used / derelict land	No		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-3 (poor-moderate)	<p>The sites' context would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the loss of existing housing were mitigated (if applicable).</p> <p>Whilst walkability is good to the site, opportunities exist to further improve the connection to walking/cycling routes (helping to mitigate against the poor PTAL rating).</p>	<ul style="list-style-type: none"> - Walkability/local connectivity improvements. - Activation of housing policies to ensure reprovision of existing residential floorspace (if necessary). - Local connectivity improvements
	Neighbouring Uses	Residential, greenspace.		
	Walkability	Good.		
5. To foster sustainable economic growth	PTAL	2-3 (poor-moderate)	<p>Allocation of this site would not have a negative impact on existing businesses. Moreover, residential development would bring additional population to the area which would support local businesses, including through expenditure and adding to the pool of local labour.</p> <p>As such allocation would have a positive impact on economic sustainability and will present opportunities to improve personal and economic resilience through new homes near employment opportunities in the area.</p>	<ul style="list-style-type: none"> - None
	Allocation likely to disrupt existing active business	No		
	Allocation likely to provide net additional space for business use	No		
	Access to freight network (road / rail / water)	Road access excellent. Rail access fair. Water access minimal.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	Yes, Nursery	<p>Good access to a range of facilities, the sites are located adjacent to Freemasons Local Centre and within a ten minute walk of Canning Town District Centre. There is a pocket park located in the centre of the two sites. This should be protected or replaced. Ashburton Wood and</p>	<ul style="list-style-type: none"> - Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. residential properties)
	Sufficiency data? / Existing Provision	Greenspace: Intersecting with a Pocket Park, SINC and Local Park within 400m and MOL 1200m.		

		<p>Medical: Custom House Surgery and pharmacy located within 400m.</p> <p>Education: Primary school within 400m, Secondary school within 800m.</p> <p>Childcare: Levels of childcare provision in Canning Town & Custom House are amongst the highest in the Borough, and well above the borough average, for both under 5s and those between 5 & 14.</p>	Canning Town Recreation Ground are located within a five minute walk of the site.	surrounding the sites)
	Scope for visibility/other improvements to existing facilities?	Yes		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Re-development / intensification would comprise a more efficient use of land commensurate with the sites' location close to a significant transport hub (Custom House) and local centre access. New build is likely to be more energy efficient than the current position, given relevant policy framework.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Potential connection to heat network
	PTAL / local access to facilities	2-3 (poor-moderate) / very good (<100m to Custom House Local Centre / Strategic Site)		
	Freight access by water or rail (e.g. for construction)	Moderate access to local wharves via road network, subject to capacity		
	Scope for re-use of buildings / materials	Some		
	Proximity to heat network	<500m potential network		
8. To improve air and	Close to water bodies / SPZs	No / no	Incorporation of SUDS as per the policy framework would	- Incorporation of greening

water quality	AQMA	No, though whole borough likely to be designated	improve the quality of surface water run-off. While the sites have small patches of grass and one mature tree this will be having little effect on air quality, redevelopment provides the opportunity to implement other air quality related policy requirements (such as improving access to sustainable modes and avoiding an increase in car use)	including mature trees - SUDS to address runoff issues - Maintain / enhance access to sustainable modes of transport
	PTAL	2-3 (poor-moderate)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Yes		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2-3 (poor-moderate)	Given the site's moderate accessibility, allocation would seek opportunities to improve the sites access to public transport and promote sustainable modes with any development at this location. However, there is a risk housing may increase trip generation by car given the low accessibility level. However, allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).	- Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will: - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Household waste only	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	FZ3	Adequate flood risk assessment (with mitigation where needed) and a responsive approach to site layout and design is essential given the FZ3 location.	- SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	No	As per the scoped policy framework, re-development would not worsen flood risk to any location. Through the	
	Proportion of	~75% of site		

	impermeable surface		inclusion of SUDS, redevelopment has the potential to significantly improve local drainage.	
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<250m	Allocation and redevelopment provides an opportunity to implement scoped biodiversity policies and thereby improve the sites' habitat offer compared to the current relative lack.	- Implementation of biodiversity and GI requirements
	Aerial review of site greening	Residential gardens, communal green space, scattered mature trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Sugarhouse Lane CA more than 1200m	Development of site does not raise issues of heritage or character assets.	- None
	Nearest Listed Building (grade)	Cranes at Royal Victoria Dock Grade II within 400m		
	Nearest ATV	ATV5 All Saints Church within 800m		
	Incongruous / poor quality buildings on site	No		
	APA	Tier 1 APA within 400m		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	None		

Balaam Street Garage (HSG22)

Area	0.23 ha	Current use	Auto Fitting & MOT Centre		Approximate Postcode	E13 8AQ
Existing allocations	None		Extant permissions	None		
Existing designations	Licensing Saturation Zone / HFT & Betting Shop concentrations, Tier 2 APA					
Proposed allocation	Non-strategic residential		Alternative options not taken forward (see Homes OA)	No allocation (retain existing employment use).		

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's accessible location within a residential context, a housing allocation could support housing and place-making/sustainable communities objectives, including local character improvements, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits, albeit with some short term transitional effects, though these may be mitigated by wider local economic development/employability work. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given its out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate housing mix and densities and achieves positive impacts on the site's surroundings, optimising the site's potential whilst being sensitive to local context.
- Contamination (via appropriate investigation).
- The securing of sustainable transport access and site connectivity and permeability.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	Whilst re-development would entail the loss of a small amount of employment generating uses, this would be covered by managed release policy (J1/J4) to mitigate the effects. Investment more generally in whatever form would also benefit the	<ul style="list-style-type: none"> - Activation of managed release policy/ bolstering access to other jobs in the vicinity. - Activation of housing mix
	PTAL	4 (good)		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 800m		

		Town Centre within 1200m	area through multiplier and ripple effects secured by policies (e.g. S1, SP8).	and choice, convergence and neighbourly development policies
	Proximity to schools	Primary within 400m Secondary within 800m	Housing would be supported by the close proximity to schools, supporting local needs. The site's access to some employment land and employment hub, provides access to employment opportunities and good transport links ensure access to opportunities further afield.	
2. To support healthier lifestyles	Health facilities	Balaam Street Practice located within 400m, CFOA within 800m.	Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix.	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC, MOL, Pocket & Local Park within 400m		
	Distance to nearest Town centre or local centre	Within 400m of Abbey Arms local centre.		
	Sports facilities; opportunities for active travel	Balaam Leisure Centre adjacent. Local walking and cycling network located in close proximity to the site.		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Located in a hot food takeaway hotspot (4). Located within 400m of a Local Centre where there is good access to a range of fresh, healthy food		
	Noise levels	Low to Medium, higher along the western perimeter of the site		
	Air Quality	Not in an AQMA		
Likelihood of land contamination	High			
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	This site provides the opportunity to create/ contribute to the creation of a successful neighbourhood, provided noise mitigation is maintained or enhanced and walkability is designed in. The provision of housing on this site would improve the local housing mix and increase the local population. This increase in population would support the nearby local centre and enhance its	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Abbey Arms Local Centre within 400m		
	PTAL	4 (good)		
	Under-used / derelict land	Yes		
	Noise	Low to Medium, higher along the		

		western perimeter of the site	viability. Allocation would also provide the opportunity to improve the visual amenity of the area and make more efficient use of a site that is well located in relation to public transport and access to a range of facilities.	
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4 (good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.	- None
	Neighbouring Uses	Residential, place of worship.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4 (good)	The site is currently occupied by auto repairs in a poor quality building and a former launderette which is now vacant. Allocation of this site would encourage the redevelopment of an underused plot of land at a key location in the vicinity of Abbey Arms Local Centre. Additionally, residential development would bring additional population to the area which would support local businesses including through expenditure and adding to the pool of local labour. As such allocation would have a positive impact on economic sustainability and will present opportunities to improve personal and economic resilience through new homes near employment opportunities in the area.	- Activation of the successful place policies will seek to help create a high quality environment for home close to opportunities for employment.
	Allocation likely to disrupt existing active business	Yes		
	Allocation likely to provide net additional space for business use	No		
	Access to freight network (road / rail / water)	Road access excellent. Rail access fair (approx. 15min walk to Plaistow Station). Water access - none.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No	Good access to a range of facilities in this location. Local Park located adjacent to the site, Plaistow Park. The greenway which connects the east and west of the borough is located within a 5 minute walk of the site and gives access to further areas of greenspace.	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. residential properties to the north)
	Sufficiency data? / Existing Provision	Childcare: SINC, MOL, Pocket & Local Park within 400m Medical: Balaam Street Practice located within 400m and 1 st Avenue Resource Centre.		

		Education: Nursery School, Primary School within 400m, and Secondary School within 800m. Childcare: Canning Town North has above the Newham average provision for under 5s childcare and has above the Newham average provision for ages 5 - 14.		
	Scope for visibility/other improvements to existing facilities	No existing community facilities		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Re-development for residential purposes would comprise a more efficient use of land commensurate with the sites' location close to a local centre in an established residential area of the borough. New build is likely to be more energy efficient than the current position, given relevant policy framework. Policies promoting re-use and recycling should be activated.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL	4 (good)		
	Access to rail / water-freight (e.g. for construction)	Low access to local wharves via road network, subject to capacity.		
	Scope for re-use of materials from existing development	Some		
	Proximity to heat network	Beyond 1200m		
8. To improve air and water quality	Proximity to water bodies / SPZs	No	Allocation would not introduce harmful uses. Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off. Redevelopment provides the opportunity to implement other air quality related policy requirements (such as improving access to sustainable modes and avoiding an increase in car use).	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Within 400m (Barking Road)		
	PTAL	4 (good)		
	Likelihood of land contamination	Fair		
	Impact on trees / GS	Potential (trees at edge of site)		
	Disruption of vehicle-heavy, polluting or contaminative use?	Yes (garage use)		
9. To increase the proportion of	PTAL	4 (good)	Development at this accessible location will have a positive impact on the proportion of journeys made	<ul style="list-style-type: none"> - Sustainable transport policies will seek to promote

journeys made by sustainable modes of transport			by sustainable modes in that it will reduce the need to travel by car to a number of key services and town centre uses. However there is a risk housing may increase trip generation by car given the reduced access to rail at the location, in which sustainable transport policies would seek to mitigate this.	<p>sustainable modes of transport with this scheme including high quality design, and promotion of public transport.</p> <ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will - Reduce dominance of car-based access - Improve sustainable travel connectivity - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators?	No – some business waste.	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk at this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m	Allocation and redevelopment provides an opportunity to implement scoped biodiversity policies and thereby improve the sites' habitat offer compared to the current relative lack.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	Few mature trees along Balaam Street		
	Natura 2000	No		

13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Sugar House Lane CA beyond 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Development of site should enhance setting of listed building in effect adjoining the site (Georgian house and railings).	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Statutory listed building at 42 Balaam St Grade II		
	Nearest ATV	ATV5 All Saints Church within 1200		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 2 APA		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes – nearby listed Georgian house		

Balaam Leisure Centre (HSG23)

Area	0.362ha	Current use	Leisure centre	Approximate Postcode	E13 8AQ
Existing allocations	None		Extant permissions	None	
Existing designations	Licensing Saturation Zone / HFT & Betting Shop concentrations/ Tier 2 APA				
Proposed allocation	<ul style="list-style-type: none"> Residential (non-strategic) 		Alternative options not taken forward (see Homes OA)	<ul style="list-style-type: none"> No allocation (retain existing leisure centre) LMUA (non-strategic) 	

Summary Assessment (further details in the table below)

Overall, an allocation could support employment, housing and place-making/sustainable community objectives and bring forward local environmental improvements, albeit with some short term transitional effects though these could be mitigated by policies that require a need based demonstration for relocation of community facility floorspace. Allocation of the site for housing-only development would be less beneficial in respect of these wider objectives, but would be appropriate due to the (local centre/ residential) character of the vicinity. Retaining the existing use, not ensuring a positive allocation would be less beneficial in respect of these wider objectives, particularly given the leisure centre's identification of reaching the end of its lifecycle. Mitigation opportunities via change of use applications and associated investment through the application of other policies, proposed and adopted, will be important mechanisms to make improvements to the status quo, securing wider environmental performance, Convergence and sustainable travel, whilst complementing the site's residential and local centre context. Generally, allocation options will allow for better use of site in an accessible location.

Site allocation must address:

- High quality design that incorporates the appropriate mix and densities, optimising the site's potential, whilst being sensitive to local context.
- Community facility floorspace relocation in accordance with identified local need.
- The securing of sustainable transport access and site permeability.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Whilst re-development would entail the loss of community facility floorspace, this would be covered by community facility release criteria (INF10) to mitigate the effects. As the site could benefit from intensification and variation (particularly given its location in close proximity to a local centre) thus an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing as part of an appropriate mix and choice of uses would also be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's access to the town centre and employment hub also provides access to local employment opportunities and transport links ensure access to opportunities further afield.</p>	<ul style="list-style-type: none"> - Activation of employment policies facilitating new employment generation on site. - Activation of community facility release policies. - Activation of housing mix and choice, convergence and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	4 - good		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 800m Town Centre Within 800m		
2. To support healthier lifestyles	Health facilities	Balaam Street Practice within 400m. CFOA within 800m	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of leisure provision, and employment are particular opportunities.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC, MOL, Pocket & Local Park within 400m		
	Distance to nearest Town centre or local centre	Adjacent to Local Centre.		
	Sports facilities; opportunities for active travel	Local walking and cycling network adjoins the site		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Located in a hot food takeaway hotspot (4). Located within 400m of a Local Centre where there is good access to a range of fresh, healthy food		
	Noise levels	Low to Medium, higher along the western		

		perimeter of the site		
	Air Quality	Not in an AQMA		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Nursery School, Primary School within 400m, and Secondary School within 800m.	This site provides the opportunity to create a successful neighbourhood, provided noise mitigation is maintained or enhanced and walkability is designed in. The provision of housing on this site would improve the local housing mix and increase the local population. This increase in population would support the nearby local centre and enhance its viability. In addition, the allocation could generate employment on site, would provide the opportunity to improve the visual amenity of the area and make more efficient use of a site that is well located in relation to public transport and access to a range of facilities.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Adjacent to Local Centre.		
	PTAL	4 - good		
	Under-used / derelict land	No		
	Noise	Low to Medium, higher along the western perimeter of the site		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4 - good	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, provided the loss of community facility floorspace is adequately mitigated.	- None
	Neighbouring Uses	Local centre/ retail commercial, residential, church.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4 – good	The allocation may result in leisure centre displacement (covered by community facilities policy). However, longer term, the development promoted should better support sustainable economic growth by securing modern, fit for purpose employment space aligned to meet growth needs and contribute to the diversification of the local economy. As such allocation would support this objective and improve people's personal and economic resilience within Newham.	<ul style="list-style-type: none"> - Implementation of community facilities policies and activation of Managed Transition policy.
	Allocation likely to disrupt existing active business	Yes – leisure centre		
	Allocation likely to provide net additional space for business use	Yes – scope on site for a net increase in additional floor space at underused part of the site.		
	Access to freight network (road / rail / water)	Reasonable road access off Barking Road. Reasonable access to wharves via the road network.		

6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Potentially loss of existing leisure centre depending on which option is chosen	Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF8. Pocket Park located adjacent to the site, Plaistow Park. The greenway which connects the east and west of the borough is located within a 5 minute walk of the site and gives access to further areas of greenspace.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8).
	Sufficiency data? / Existing Provision	Nursery School, Primary School within 400m, and Secondary School within 800m. Canning Town North has above the Newham average provision for under 5s childcare and has above the Newham average provision for ages 5 - 14.		
	Scope for visibility improvements to existing facilities	Potentially scope to improve the leisure centre if re-provided on site		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	No site-specific issues, allocation provides scope for implementation of relevant policies.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use - energy efficient build - maintain / enhance access to sustainable modes
	PTAL / local access to facilities	4 - good		
	Freight access by water or rail (e.g. for construction)	Low access to local wharves via road network, subject to capacity.		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	>1200m		
8. To improve air and water quality	Close to water bodies / SPZs	No	No site-specific issues, allocation provides opportunity for implementation of relevant policies.	<ul style="list-style-type: none"> - Implementation of air quality / GI policies as scoped - SUDS to address runoff issues - Enhance access to sustainable modes of transport
	AQMA	AQMA located to the south of the site, though whole borough likely to be designated		
	PTAL	4 - good		
	Likelihood of land	Normal		

	contamination			
	Impact on trees / GS	Potential		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	4 - good	<p>The good level of accessibility presents opportunities to promote sustainable travel including walking, cycling and the use of public transport. Opportunities to support sustainable travel would be sought including designing in and improving cycle facilities/walking routes and access would be key components of any use at this site.</p> <p>Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p>	- Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	1	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and protect existing habitats and	Proximity to SINC	<400m, Greenway	Minimal greening on site, redevelopment provides the opportunity to implement relevant policies and improve offer.	- Implementation of relevant policies
	Aerial review of site greening	Some trees in carpark and on Balaam Street		

biodiversity	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Sugar House Lane CA beyond 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Development of site should enhance setting of listed building adjoining the site (Georgian house and railings).	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Statutory listed building at 42 Balaam St Grade II		
	Nearest ATV	ATV5 All Saints Church within 1200		
	Incongruous / poor quality buildings on site	No		
	APA	Tier 2 APA		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes – nearby listed Georgian house		

Abbey House (HSG32)

Area	0.2 ha	Current use	Housing with communal open space and parking	Approximate Postcode	E15 3NB
Existing allocations	None		Extant permissions	None	
Existing designations	APA Tier 1				
Proposed allocation	<ul style="list-style-type: none"> Non-strategic Residential-led Mixed Use 		Alternative options not taken forward (see Homes OA)	No allocation	

Summary Assessment (further details in the table below)

Currently occupied by a single low rise housing block, the site is underutilised and requires investment. Overall, compared to the status quo, an allocation should encourage development that contributes positively to housing and place-making/sustainable community objectives including local environmental improvements and the incorporation of local retail provision, making better use of a site in a location with good DLR access and securing better integration with the wider residential and heritage context. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to wider environmental performance, and prevent any negative impacts, notably in relation to neighbourliness, heritage, noise, and air quality exposure.

Site allocation must address:

- Contamination, noise pollution, surface water runoff, and air quality issues (via appropriate investigation).
- High quality design, incorporating the appropriate housing mix, densities and building heights that account for local context.
- The securing of sustainable transport access and site connectivity and permeability, connecting to the nearby DLR.
- Appropriate housing mix, density and building heights that optimise the site's potential, whilst being sensitive to local and area context.
- Protection of the site's heritage context that safeguards the adjacent Scheduled Ancient Monument and SINC and considers the APA.
- Connection to district heating network, promotion of efficient use of resources through improved land use efficiency, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>Given the proximity to a town centre, employment hub, LIL and LMUA employment land the site has good local access to employment opportunities, with those further afield accessible through adjacent transport links. Redevelopment would not involve the loss of any existing employment land, however investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, SP8).</p> <p>Intensification of housing on site would be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. Overall, an allocation provides the opportunity to reduce poverty and promote further equality of opportunity in a number of ways compared to the present situation.</p>	- Activation of housing mix and choice, convergence and neighbourly development policies.
	PTAL	2-4 (poor – good) across the site		
	Proximity to employment land	SIL within 1200m LIL adjacent LMUA within 400m Employment Hub within 800m Town Centre within 800m		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Abbey Road Medical Practice, West Ham Practice and a pharmacy located within 400m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice, and employment generation are particular opportunities.</p>	- Secure sustainable transport access and permeability
	Green Space	Pocket Park adjacent, SINC and MOL within 400m, Local Park within 800m		
	Distance to the nearest town or local centre	Local Centre within 400m		
	Sports facilities; opportunities for active travel	Stratford Metropolitan Centre is located within 1200m of the site where numerous sports facilities are accessible. Local walking and cycling network located adjacent		

		to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Not located in a hot food takeaway hotspot. Limited access to fresh, healthy food in Plaistow Road Local Centre. However the site is located adjacent to the Abbey Road DLR station which makes Stratford Metropolitan Centre easily accessible via public transport.		
	Noise levels	Low		
	Air Quality	Not located in an AQMA.		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	The allocation of this site provides the opportunity to create successful neighbourhoods. The site is located within easy reach of a wide range of facilities. The site is adjacent to Abbey Road DLR station, is within a five minute walk of Plaistow Road local centre and a ten minute walk of Stratford Metropolitan Centre. The introduction of housing on this site, would improving local housing mix and provide an increase in population that would support the businesses located in the nearby local centre. This would enhance the viability and sustainability of the local centre and the wider neighbourhood.	<ul style="list-style-type: none"> - Activate the Successful Places Policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Plaistow Road Local Centre within 400m		
	PTAL	2-4 (poor – good) across the site		
	Under-used / derelict land	Yes		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-4 (poor – good) across the site	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts of the loss of existing housing were mitigated.	<ul style="list-style-type: none"> - Walkability/local connectivity improvements. - Activation of housing policies to ensure re-provision of existing residential floorspace.
	Neighbouring Uses	Residential, DLR station and track, greenspace.		
	Walkability	Fair		
			Whilst the site is DLR adjacent opportunities exist to reconfigure the site to improve walkability and the connection to walking/cycling routes.	

5. To foster sustainable economic growth	PTAL	2-4 (poor – good) across the site	<p>Allocation of this site would not have a negative impact on existing businesses. Moreover, residential development would bring additional population to the area which would support local businesses, including through expenditure and adding to the pool of local labour.</p> <p>As such allocation would have a positive impact on economic sustainability and will present opportunities to improve personal and economic resilience through new homes near employment opportunities in the area.</p>	- None
	Allocation likely to disrupt existing active business	No – no businesses on site		
	Allocation likely to provide net additional space for business use	No		
	Access to freight network (road / rail / water)	Road/ Rail excellent, Water minimal		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	<p>Good level of access to a range of facilities, Plaistow Road Local Centre is within a five minute walk. Stratford Metropolitan Centre and Canning Town Centre are easily accessible via the DLR station which is adjacent to the site. Open/play space and the greenway within 400m of the</p>	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. residential properties to the west)
	Sufficiency data? / Existing Provision	<p>Greenspace: Pocket Park adjacent, SINCE and MOL within 400m, Local Park within 800m</p> <p>Medical: Abbey Road Medical Practice, West Ham Practice and a pharmacy located within 400m.</p> <p>Education: Primary School within 400m, Secondary School within 800m.</p> <p>Childcare: West Ham provides the borough average in relation to childcare for both under 5s and those in the 5-14 year age range. However, Stratford and New Town is adjacent to West Ham and provides significantly above the borough</p>		

		average in relation to childcare for both under 5s and those in the 5-14 year age range.		
	Scope for visibility/other improvements to existing facilities?	None		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	<p>Re-development / intensification would comprise a more efficient use of land commensurate with the sites' location close to a DLR station and local centre access. New build is likely to be more energy efficient than the current position, given relevant policy framework.</p> <p>Policies promoting re-use and recycling should be activated.</p> <p>Significant local heat load provides imperative for heat network solutions; some scope for linking to 'potential' network depending on scale of redevelopment / progress of networks.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport - Potential connection to heat network
	PTAL	2-4 (poor – good) across the site		
	Access to rail / water-freight (e.g. for construction)	Low access to local wharves via road network, subject to capacity.		
	Scope for re-use of materials from existing development	Some.		
	Proximity to heat network	Within 400m		
8. To improve air and water quality	Proximity to water bodies / SPZs	Within 1200m	<p>Allocation would not introduce harmful uses.</p> <p>Given good access to transport and facilities, allocation would not be expected to significantly increase the number of journeys by private motor vehicle (with associated implications for air quality).</p> <p>Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.</p>	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Within 400m		
	PTAL	2-4 (poor – good) across the site		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Yes		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2-4 (poor – good) across the site	<p>Given the site's varying accessibility, allocation would seek opportunities to improve the sites access to public transport and promote sustainable modes with any development at this location.</p> <p>However there is a risk that housing may increase trip</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> - Reduce dominance of car-based access

			<p>generation by car given the low accessibility level, in which sustainable transport policies would seek to mitigate this.</p> <p>Overall sustainable travel policies as scoped could help mitigate the likelihood of car-based travel by enhancing the attractiveness of sustainable modes and improving local connectivity.</p>	<ul style="list-style-type: none"> - Improve sustainable travel connectivity, - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators?	Residential only.	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection.		
11. To minimise and reduce flood risk	Flood zone	No (but FZ 2/3 adjacent)	Given policy framework as scoped, re-development would not worsen flood risk at this location adjacent a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	40% - building and car park		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m	Allocation and redevelopment provides an opportunity to implement scoped biodiversity policies and thereby improve the sites' habitat offer compared to the current relative lack.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	Communal green/open space.		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Stratford St John CA less than 400m	<p>Development of the site will require standard archaeological investigation for APA Tier 1 as per Policy SP5/5a.</p> <p>Development of site should enhance setting of adjacent DLR station.</p> <p>Development of site should provide the opportunity enhance the setting of the community garden & Scheduled</p>	<ul style="list-style-type: none"> - Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Group of Grade II listed buildings at Abbey Lane including pumping station and terraced housing within 400m		
	Nearest ATV	All Saints Church ATV within 800m		

	Incongruous / poor quality buildings on site	Yes	Ancient Monument at Bakers Row, and make better use of the DLR station.	
	APA	Within APA Tier 1		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes		

15 – 21 Leytonstone Road (HSG33)

Area	0.05 ha	Current use	Mixed use, builders yard to the rear and commercial with some residential above	Approximate Postcode	E15 1JA
Existing allocations	None		Extant permissions	None	
Existing designations	CFOA/ MBOA, AQMA, Local Parks Deficiency, Access to Nature Deficiency, Licensing Saturation Policy Zone, HFT/BS Concentration Zone/ STOA				
Proposed allocation	Non-strategic residential led mixed use, in accordance with CFOA and MBOA		Alternative options not taken forward (see Sites OA)	No allocation, retain existing CFOA/ MBOA designations	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's location within an edge-of-centre context, a residential allocation with scope to incorporate B1 micro business and D1 community facility uses (as a result of existing designations), where local needs based justifications can be demonstrated, could support housing, employment, and place-making/sustainable communities objectives, including local character improvements, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given its out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate mix, layouts, and densities, taking into account the accessible location and optimises the site's potential, whilst being sensitive to the site's context.
- Noise and air quality issues (via appropriate investigation).
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	Whilst re-development could entail the loss of a very small amount of employment generating uses, this would be covered by managed transition/ release policy (J1/ J4) to mitigate the effects and as part of the site are underutilised it could benefit from intensification.	<ul style="list-style-type: none"> - Activation of managed release policy/ bolstering access to other jobs in the vicinity. - Activation of housing mix
	PTAL	6b (excellent)		
	Proximity to employment land	SIL beyond 1200m LIL within 1200m LMUA within 400m Employment Hub within		

		400m Town Centre within 400m	Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).	and choice, convergence and community facility and neighbourly development policies.
	Proximity to schools	Primary within 400m Secondary within 400m	Housing would be supported by the close proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's access to some employment land and the town centre and employment hub provides access to local employment opportunities, and extensive transport links close by provide access to opportunities further afield.	
2. To support healthier lifestyles	Health facilities	Stratford Health Centre and a number of pharmacies located within 400m of the site	Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice, and employment generation are particular opportunities.	<ul style="list-style-type: none"> - Activate cumulative impact policy. - Secure sustainable transport access and permeability.
	Green Space	SINC and Pocket Park within 400m, Local Park within 800m and MOL beyond 1200m.		
	Distance to nearest town or local centre	Maryland Local Centre adjacent		
	Sports facilities; opportunities for active travel	Numerous sports facilities located within Stratford Metropolitan Centre which is within 400m of the site.		
	Hot Food Takeaway Hotspot	Located in a hot food takeaway hotspot (4). Numerous outlets providing fresh, healthy food in Stratford Metropolitan Centre which is located within 400m of the site.		
	Noise levels	High		
	Air Quality	Southern part of the site located within an AQMA		

	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school and Secondary school within 400m, located in CFOA	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, provided noise mitigation is enhanced and walkability is designed in. The introduction of housing on this site would improve local housing mix and provide an increase in population that would support the businesses located in the adjacent local centre. This would enhance the viability and sustainability of the local centre and the wider neighbourhood. The site is well connected, adjacent to Maryland local centre and within a five minute walk of Stratford Metropolitan Centre where a wide range of facilities and transport connections can be accessed.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 400m of Stratford metropolitan centre		
	PTAL	6b (excellent)		
	Under-used / derelict land	No		
	Noise	High		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	6b (excellent)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.	- None
	Neighbouring Uses	Residential, commercial		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	6b (excellent)	<p>Allocation of this site would encourage the redevelopment of an underused plot of land at a key location along a movement corridor at the edge of Maryland Local Centre and in the vicinity of Stratford Metropolitan Centre. Allocation of this site may have a limited negative impact on existing small businesses on site, requiring their relocation. However, allocation of the site may present opportunities for investment in a higher quality business environment at this location (via the MBOA designation).</p> <p>Residential development would bring additional population to the area, utilising an underused plot of land which would support local businesses including through expenditure within the Local Centre and adding to the pool of local labour.</p>	<ul style="list-style-type: none"> - Mitigation measures to protect employment at this location will be subject to tests against the managed release criteria (J4, J1). - Activation of the successful places policies will seek to help create a high quality environment to retain and attract employment.
	Allocation likely to disrupt existing active business	Yes		
	Allocation likely to provide net additional space for business use	Same		
	Access to freight network (road / rail / water)	Road/Rail access excellent, Water via the road network		

			As such allocation would have a positive impact on the economic sustainability of Maryland Local Centre and will present opportunities to improve personal and economic resilience through new homes near employment opportunities in the area.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	Good level of access to a range of facilities, Maryland Local Centre is adjacent to the site and Stratford Metropolitan Centre is less than a five minute walk. Scope, due to the location of the site, to address any deficiencies arising as per INF6 through excellent public transport access (to larger parks e.g. West Ham Park and Wanstead flats).	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC and Pocket Park within 400m, Local Park within 800m and MOL beyond 1200m.</p> <p>Medical: Stratford Health Centre and a number of pharmacies are located within 400m.</p> <p>Education: Primary and a secondary school within 400m.</p> <p>Childcare: Stratford and New Town provides well above the borough average in relation to childcare provision for both under 5s and those in the 5-14 year age range.</p>		
	Scope for visibility/other improvements to existing facilities?	None		
7. To promote resource-efficient development, design	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated.	- Re-use of materials and improved efficiency of land use / energy efficient build
	PTAL	6b (excellent)	Allocation will allow for intensification of residential use, constituting a more efficient use of the land commensurate with	

and construction	Access to rail / water-freight (e.g. for construction)	Low access to local wharves via road network, subject to capacity.	its good public transport and town centre accessibility (Stratford Metropolitan). New build likely to be more energy efficient than existing buildings, as specified within the policy framework.	<ul style="list-style-type: none"> - Maintain / enhance access to sustainable mode of transport - Construction deliveries reliant on freight to be balanced with road/junction capacity.
	Scope for re-use of materials from existing development	Some.		
	Proximity to heat network	Within 800m.		
8. To improve air and water quality	Proximity to water bodies / SPZs	No	Allocation would not introduce harmful uses.	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Yes		
	PTAL	6b (excellent)	Good access to transport and facilities means allocation would not be expected to significantly increase the number of journey by private motor vehicle (with associated implications for air quality).	
	Likelihood of land contamination	Minimal		
	Impact on trees / GS	No	Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.	
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	6b (excellent)	<p>Development at this highly accessible location will have a positive impact on the proportion of journeys made by sustainable modes in that it will reduce the need to travel by car to a number of key services and town centre uses. With a sustainable travel opportunity area, the cumulative impacts travel should be addressed to support this objective both maximising sustainable travel options and the impacts of congestion along the movement corridor.</p> <p>Allocation close to Maryland Station (which has seen public realm improvements and investment from Crossrail development) will benefit from this and the proportion of journeys made by sustainable modes to the site.</p>	<ul style="list-style-type: none"> - Sustainable transport policies will seek to promote sustainable modes of transport with this scheme including high quality design, linear gate way improvements and promotion of public transport. Requirement to meet objectives for the sustainable travel opportunity area with proposals in this location. - Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3, SP8, SP9) will

				<ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators?	No – mostly residential waste, some business waste.	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk at this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	Vicinity/access - Leytonstone Road		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Stratford St John conservation area within 400m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site does not raise heritage issues.	<ul style="list-style-type: none"> - None apart from standard archaeological investigation
	Nearest Listed Building (grade)	Theatre Royal, Stratford Grade II* within 400m Locally listed buildings at 66 to 67 Leytonstone Road within 400m		
	Nearest ATV	Wanstead Flats within 800m		
	Incongruous / poor quality buildings on site	No		

	APA	Within Tier 1 APA Adjacent Tier 2 APA		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	N/a		

Rosebery Avenue (HSG35)

Area	0.23ha	Current use	Industrial Premises	Approximate Postcode	E12 6PS
Existing allocations	None		Extant permissions	None	
Existing designations	Local Park Deficiency, District Park Deficiency, Access to Nature Deficiency				
Proposed allocation	Non-strategic residential		Alternative options not taken forward (see Homes OA)	None	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's location within a residential context, a housing allocation could support housing and place-making/sustainable community objectives, including local character improvements, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate housing mix and densities and achieves positive impacts on the site's surroundings, optimising the site's potential whilst being sensitive to local context.
- Potential contamination (via appropriate investigation).
- The securing of sustainable transport access and site connectivity and permeability.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data	Commentary	Mitigation
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1. To reduce poverty and promote equality of opportunity	LSOA IMD?	40% most deprived	<p>Whilst re-development would entail the loss of a small amount of employment generating uses, this would be covered by managed release policy (J1/ J4) to mitigate the effects. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8).</p> <p>Housing would be supported by the close proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's access to some employment land and the town centre and employment hub, provides access to employment opportunities, and transport links in these locations provide access to opportunities further afield. However walkability across the site to connect with opportunities will be important to address the low PTAL. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of managed release policy/ bolstering access to other jobs in the vicinity. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	1b – 3 (poor – moderate) across the site		
	Proximity to employment land	SIL beyond 1200m LIL within 400m LMUA beyond 1200m Employment Hub within 800m Town Centre within 800m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	The Centre Manor Park within 800m	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) noise mitigation is maintained and any contamination is dealt with. This site provides the opportunity to convert an industrial use, located in a predominantly residential neighbourhood, into housing. This would have the effect of reducing the likelihood of pollution in the area.</p>	<ul style="list-style-type: none"> - Secure sustainable transport access and permeability
	Green Space	SINC within 400m, MOL, Local and Pocket Park within 800m		
	Distance to nearest Town centre or local centre	Local Centre within 400m		
	Sports facilities; opportunities for active travel	Manor Park Fitness Centre within 1200m. Local cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/ access to fresh, healthy food	Not located in a hot food takeaway hotspot. Numerous outlets for fresh healthy food located within East Ham Major Centre which is within 800m of the site.		

	Noise levels	Low		
	Air Quality	Not located in an AQMA		
	Likelihood of land contamination	Fair		
3. To create successful neighbourhoods	Proximity to community facilities	Primary and Secondary school within 400m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods through the cessation of onsite industrial uses, maintenance of noise mitigation and designing in walkability. The site is within a five minute walk of High Street North Local Centre and East Ham Major Centre is within a ten minute walk. A wide range of facilities can be accessed in these locations. The provision of housing on this site would provide an increase in population that would support the businesses in the nearby local and major centres which would increase the viability of the neighbourhood. The substitution of the current industrial use with the more appropriate residential use would improve the amenity and outlook of the residents in the surrounding residential properties.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	High Street North Local Centre within 400m		
	PTAL	1b – 3 (poor – moderate) across the site		
	Under-used / derelict land	No		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1b – 3 (poor – moderate) across the site	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix. Whilst walkability around the site is good, opportunities exist to further improve walkability/permeability within the site, with connections to walking/cycling routes (to mitigate the poor PTAL rating).	<ul style="list-style-type: none"> - Walkability/local connectivity improvements
	Neighbouring uses	Residential		
	Walkability	Fair - Good		
5. To foster sustainable economic growth	PTAL	1b – 3 (poor – moderate) across the site	Site currently is occupied by a builders yard in which allocation would be subject to managed transition criteria to support the continued provision and delivery of employment uses (off site) and housing.	<ul style="list-style-type: none"> - Activation of Managed Transition policy J4, J2 (market demand testing and relocation strategy) - Existing design policies as scoped should seek to improve relationship
	Allocation likely to disrupt existing active business	Yes – builders yard		
	Allocation likely to provide net additional space for business use	No	Allocation would bring additional population to the area which would support local businesses including through	

	Access to freight network (road / rail / water)	Road access fair but site constrained due to nature of back-land site access. Rail access fair (15min walk to East Ham or Woodgrange Park Stations). Water access would be via the strategic road network.	expenditure and adding to the pool of local labour. As such allocation would have a positive impact on economic sustainability and will present opportunities to support growth and improve personal and economic resilience through the delivery of new homes and communities to support economic growth.	between employment uses and residential uses.
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	Good level of access to a range of facilities, High Street North Local centre and East Ham Major Centre are within a 5 and 10 minute walk respectively. Plashet Park and Hathaway Crescent Small Play Space are located within a 5 minute walk of the site.	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. surrounding residential properties)
	Sufficiency data? / Existing Provision	Greenspace: SINC within 400m, MOL, Local and Pocket Park within 800m Medical: The Centre Manor Park within 800m. Education: Nursery, Primary and Secondary Schools within 400m. Childcare: East Ham North has 1 under 5s childcare place per 5 resident children. This is above the Newham average. East Ham North has 1 over 5s childcare place per 17 resident children which is above the Newham average		
	Scope for visibility improvements to existing facilities	None		
7. To promote resource-efficient development, design	Re-use / intensification of previously developed / underused land	Yes	Re-development for residential purposes would comprise a more efficient use of land commensurate with the sites' location in an established residential area of the borough.	- Re-use of materials and improved efficiency of land use / energy efficient build
	PTAL	1b – 3 (poor – moderate)		

and construction		across the site	New build is likely to be more energy efficient than the current position, given relevant policy framework. Policies promoting re-use and recycling should be activated.	- Maintain / enhance access to sustainable mode of transport
	Access to rail / water-freight (e.g. for construction)	Low access to local wharves via road network, subject to capacity.		
	Scope for re-use of materials from existing development	Some		
	Proximity to heat network	Beyond 1200m		
8. To improve air and water quality	Proximity to water bodies / SPZs	Intersecting SPZ	Allocation would not introduce harmful uses. Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water runoff. Redevelopment provides the opportunity to implement other air quality related policy requirements (such as improving access to sustainable modes and avoiding an increase in car use).	- Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	No, though whole borough likely to be designated.		
	PTAL	1b – 3 (poor – moderate) across the site		
	Likelihood of land contamination	Fair		
	Impact on trees / GS	No		
	Disruption of vehicle-heavy, polluting or contaminative use?	Yes		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	1b – 3 (poor – moderate) across the site	Given the site's low accessibility, allocation would have a positive impact on this objective to improve the sites access to public transport and promote sustainable modes with any development at this location. However there is a risk that development may increase trip generation by car, in which case sustainable transport policies would seek to mitigate this. Allocation would seek opportunities to improve the access arrangement onto the site for both walking and cycling, which in turn support this objective.	- Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will: - Reduce dominance of car-based access - Improve sustainable travel connectivity - Capacity and reliability
10. To minimise the production of waste	Are existing uses high waste generators?	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to	- Minimise waste generation and maximise

across all sectors and promote the proximity principle	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection	minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk at this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m	Allocation and redevelopment provides an opportunity to implement scoped biodiversity policies and thereby improve the sites' habitat offer compared to the current relative lack.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Within 1200m of Durham Road conservation area	None	<ul style="list-style-type: none"> - Development of site does not raise heritage issues
	Nearest Listed Building (grade)	St Barnabas Church, Browning Road Grade II within 400m Locally listed Sri Murugan Temple, Browning Road within 400m		
	Nearest ATV	ATV3 Manor Park within 800m		
	Incongruous / poor quality buildings on site	Yes		
	APA	APA Tier 1 within 800m APA Tier 2 within 400m		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	No – backland site		

Prince Regent Lane (HSG36)

Area	0.09 ha	Current use	Car sales garage	Approximate Postcode	E13 8RH
Existing allocations	None			Extant permissions	None
Existing designations	None				
Proposed allocation	Non-strategic Residential			Alternative options not taken forward (see Homes OA)	No allocation

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's reasonably accessible location within a residential/ local centre context, a housing allocation could support housing and place-making/sustainable community objectives, including local character improvements, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate housing mix and densities and achieves positive impacts on the key corridor, optimising the site's potential whilst being sensitive to local context.
- Contamination, noise pollution, flood risk and air quality issues (via appropriate investigation).
- The securing of sustainable transport access and site connectivity.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	Whilst re-development would entail the loss of a small amount of employment generating uses, this would be covered by managed release policy (J1/ J4) to mitigate the effects. Investment more generally in whatever form would also benefit the area through multiplier and ripple	<ul style="list-style-type: none"> - Activation of managed release policy/ bolstering access to other jobs in the vicinity. - Activation of housing mix
	PTAL	4 (good)		
	Proximity to employment land	SIL beyond 1200m LIL within 1200m LMUA within 800m Employment Hub within		

		400m Town Centre within 1200m	effects secured by policies (e.g. S1, J3, J4, and SP8).	and choice, convergence and community facility and neighbourly development policies
	Proximity to schools	Primary within 400m Secondary within 400m	Housing would be supported by the close proximity to schools, supporting local needs. The site's proximity to some employment land and employment hub, provides access to employment opportunities and good transport links ensure provide access to opportunities further afield.	
2. To support healthier lifestyles	Health facilities	Greengate Medical Centre is within 400m. Newham University Hospital, Gateway Surgical Centre & Newham Centre for Mental Health is within 800m.	Overall, the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and bus access), further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. Development presents an opportunity to reduce car-dependent development and to improve local housing mix.	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	Adjacent to MOL and SINC, Pocket Park and Local Parks within 400m.		
	Distance to nearest town or local centre	Adjacent to Greengate Local Centre		
	Sports facilities; opportunities for active travel	Newham Leisure Centre within 800m. Local walking and cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Located in a hot food takeaway hotspot (3). Access to some fresh, healthy food outlets within Greengate local centre. A larger choice of outlets is available in Canning Town which is easily accessible via public transport.		
	Noise levels	Low to high, highest along the western boundary of the site		

	Air Quality	AQMA located along the western boundary of the site		
	Likelihood of land contamination	High, in use as a car sales/repair garage.		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, provided noise mitigation is maintained and walkability is designed in. The introduction of housing on this site would improve local housing mix and provide an increase in population that would support the businesses located in the adjacent local centre. This would enhance the viability and sustainability of the local centre and the wider neighbourhood. In addition it provides the opportunity to enhance the visual appearance of the area through the replacement of the current use which is not making the most appropriate use of the site and detracts from the visual appearance of what is a Key Movement Corridor & Linear Gateway in the borough.	<ul style="list-style-type: none"> - Activate the Successful Places Policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Adjacent Greengate local centre		
	PTAL	4 (good)		
	Under-used / derelict land	Yes		
	Noise	High levels of road noise		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4 (good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.	- None
	Neighbouring Uses	Commercial (retail), residential.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4 (good)	Site currently occupied by a car sales garage. Allocation of this site would encourage the redevelopment of an underused plot of land at a key location to support the economic growth of Greengate Local Centre. Additionally, residential development would bring additional population to the area which would support local businesses including through expenditure and adding to the pool of local labour. As such allocation would have a positive impact on	<ul style="list-style-type: none"> - Mitigation measures to protect employment at this location will be subject to tests against the managed release criteria including: - Consistency with spatial strategy - Supporting regeneration objectives
	Allocation likely to disrupt existing active business	Yes – car garage		
	Allocation likely to provide net additional space for business use	No		
	Access to freight network (road / rail / water)	Road access good. Rail access fair (15min walk to Plaistow Station). Water access none but via road		

		network.	economic sustainability and will present opportunities to improve personal and economic resilience through new homes near employment opportunities in the area.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	Good access to a range of facilities in this location. Pocket Park located adjacent to the site. Plaistow Park, a local park, is located within a 5 minute walk of the site. The greenway which connects the east and west of the borough is located within a 5 minute walk of the site and gives access to further areas of greenspace.	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. residential properties to the south and east)
	Sufficiency data? / Existing Provision	<p>Greenspace: Adjacent to MOL and SINC, Pocket Park and Local Parks within 400m</p> <p>Medical: Greengate Medical Centre is within 400m. Newham University Hospital is within 800m.</p> <p>Education: Nursery, Primary and Secondary Schools within 400m.</p> <p>Childcare: Plaistow South provides below the borough average in relation to childcare places for both under 5s and those in the 5-14 years age range. Custom House which is adjacent to Plaistow South has above the borough average provision in relation to childcare.</p>		
	Scope for visibility/other improvements to existing facilities?	None		
7. To promote resource-efficient	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated.	- Re-use of materials and improved efficiency of land

development, design and construction	PTAL	4 (good)	Allocation will allow a more efficient use of the land commensurate with its good public transport and town centre accessibility. New builds are likely more energy efficient than existing buildings, as specified within the policy framework.	<ul style="list-style-type: none"> - use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	Access to rail / water-freight (e.g. for construction)	Not relevant.		
	Scope for re-use of materials from existing development	Limited.		
	Proximity to heat network	Beyond 1200m		
8. To improve air and water quality	Proximity to water bodies / SPZs	None	Allocation would not introduce harmful uses. Given good access to transport and facilities, allocation would be expected to reduce the number of journey by private motor vehicle (with associated implications for air quality) over the current use as car sales. Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water runoff.	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Yes		
	PTAL	4 (good)		
	Likelihood of land contamination	Yes (car garage)		
	Impact on trees / GS	No		
	Disruption of vehicle-heavy, polluting or contaminative use?	Yes		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	4 (good)	<p>Development at this accessible location will have a positive impact on the proportion of journeys made by sustainable modes in that it will reduce the need to travel by car to a number of key services and town centre uses.</p> <p>However there is a risk housing may increase trip generation by car given the reduced access to rail at the location, in which sustainable transport policies would seek to mitigate this.</p> <p>Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability

			transport investment as per INF1). Promotion of sustainable modes with housing would be designed in as a key component of any delivery on site.	
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators?	No – mostly residential waste, some business waste.	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk at this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	Yes		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent	Given the complete absence of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	East Ham CA beyond 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site does not raise heritage issues.	<ul style="list-style-type: none"> - Standard archaeological investigation.
	Nearest Listed Building (grade)	Tramway Workers War Memorial, Greengate Street Grade II		
	Nearest ATV	ATV5 All Saints Church beyond 1200m		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 2 APA		
	Proximity to ACV	N/a		
	Potential to enhance	None		

	other character assets (parks, stations etc.)			
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Bow County Court (CF06)

Area	0.21ha	Current use	Bow County Courthouse	Approximate Postcode	E15 4EH
Existing allocations	None		Extant permissions	None	
Existing designations	University Conservation Area / AQMA / access to nature deficiency / Licensing Saturation Zone / HFT & Betting Shop concentrations/ APA				
Proposed allocation	Community facility (health) and Residential (non-strategic)		Alternative options not taken forward (see Social Infrastructure OA)	No allocation	

Summary Assessment (further details in the table below)

The planned cessation of the Bow County Court function in 2017 presents an opportunity for an allocation that retains a community facility on site, whilst bringing forward housing provision. Overall, compared to the status quo, given the site's accessible location along a key corridor, a site comprising healthcare community floorspace (delivered in accordance with identified local need) together with an element of residential could support housing, place-making and sustainable communities objectives including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies and any impacts on heritage would require careful consideration and mitigation.

Site allocation must address:

- Noise and air quality issues (via appropriate investigation, mitigation and buffering).
- High quality design integrating and enhancing the locally listed building.
- Appropriate density and building heights that optimise the site's potential, taking into account of accessible location, whilst being sensitive to the site's heritage and local context.
- Appropriate housing mix considerations.
- The securing of sustainable transport access and permeability.
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through re-use of building/materials, reduction in waste generation and increased recycling, and energy efficient build/conversion.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	40% most deprived	<p>Increasing health infrastructure provision in this accessible location provides an opportunity to promote equality of opportunity via access to services compared to the current situation which is a highly focused community use..</p> <p>Housing as part of the mix of uses would also be supported by the close proximity to local schools and other social infrastructure (including community facilities) to support local needs, and could be brought forward on the site as part of an appropriate mix and choice. The site's close proximity to the town centre and employment hub provides local access to employment opportunities. The extensive transport links in Stratford will also provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	3-4 (moderate – good) across the site		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 400m Town Centre Within 400m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Proposed on site	<p>Overall the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and air quality mitigation and exposure secured through design quality.</p>	<ul style="list-style-type: none"> - Protect or enhance the greenspace to west of the site and incorporate other greening in order mitigate pollution. - Management of noise and air quality exposure through design. - Activate cumulative impact policy - Secure sustainable transport access and permeability - Activate Policy INF10
	Green Space	SINC, Pocket Park and Local Park within 400m. Metropolitan Open Land beyond 1200m		
	Distance to nearest Town centre or local centre	Local Centre within 400m		
	Sports facilities	Atherton Leisure Centre within 400m	<p>This site has been identified by Newham Clinical Commissioning Group (NCCG) as a suitable site, in terms of both scale and location, for the creation of a strategically significant medical facility providing for health care needs.</p>	
	Green Space	Pocket Park within 400m, Local Park within 800m		
	Hot Food Takeaway Hotspot/access to fresh, healthy food.	Located within a hot food takeaway hotspot (3). Some availability of fresh food outlets in the vicinity of the site on Romford Road and in Vicarage Lane Local		

		Centre. There are numerous outlets available in Stratford Metropolitan Centre.		
	Noise levels	High at frontage to Romford Road		
	Air Quality	AQMA along the northern perimeter of the site		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	This site offers a good opportunity to help enhance a successful neighbourhood. The site is located in an area that is well connected by public transport. In addition the site is within a five minute walk of Stratford Metropolitan Centre in which a range of facilities can be accessed. Allocation of this site provides the opportunity to improve local housing mix and provide an updated social infrastructure offer on the site. Allocation of the site provides the opportunity to reconfigure the layout of the site so that it can be used in the most efficient manner possible.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 400m of Stratford Metropolitan Centre		
	PTAL	3-4 (moderate – good) across the site		
	Under-used / derelict land	Yes – courthouse now redundant.		
	Noise	High at frontage to Romford Road		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	3-4 (moderate – good) across the site	The site’s context would support an allocation that allows for the provision of a choice of new quality housing within the mix. Whilst walkability is good, opportunities exist to boost walkability within the site, further improving the connection to walking/cycling routes and public transport, improving upon areas where lower PTALs occur.	<ul style="list-style-type: none"> - Walkability improvements.
	Neighbouring Uses	Residential, road. Commercial uses and school opposite.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	3-4 (moderate – good) across the site	Allocation of this site would result in the activation of a heritage asset for a mix of uses which supports the creation of successful places for people to live and work. It would also bring new consumers and footfall to the town centre, supporting growth there.	<ul style="list-style-type: none"> - Activation of the successful place policies will seek to help create a high quality environment to retain and attract employment.
	Allocation likely to disrupt existing active business	No- vacant court house		
	Allocation likely to provide net additional	Unlikely – some community could be		

	space for business use	provided	As such allocation would have a positive impact on economic sustainability, will present opportunities to improve personal and economic resilience through new jobs and homes in the area.	
	Access to freight network (road / rail / water)	Reasonable access for freight along the strategic road network (Romford Road); reasonable access to wharves via the strategic road network.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Yes, Bow County Court – but alternative community use likely to be re-provided	Good access to a range of facilities and scope within scale of site and edge of centre location to address any deficiencies arising as per INF76/8.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/10)
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC, Pocket Park and Local Park within 400m. Metropolitan Open Land beyond 1200m</p> <p>Medical: To be provided on site; GP within 400m</p> <p>Education: Nursery, Primary and Secondary School within 400m. University of East London within 400m.</p> <p>Childcare: Forest Gate South has 1 under 5s childcare place per 8 resident children. This is below the Newham average. Forest Gate South has 1 over 5s childcare place per 85 resident children which is below the Newham average. However, Forest</p>	<p>Located less than a five minute walk from West Ham Park. The site is well served by public transport which provides access to other large parks within the borough.</p> <p>The site is located within a five minute walk of a GP practice. In addition, the site itself has been identified by Newham Clinical Commissioning Group (NCCG) as a suitable site, in terms of both scale and location, for the creation of a strategically significant medical facility.</p>	

		Gate South is adjacent to Stratford & New Town and Forest Gate North which both have above average provision and are within reach of Forest Gate South.		
	Scope for visibility improvements to existing facilities	Yes, Bow County Court		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	There is scope for building re-use given its size and scale, however policies promoting re-use and recycling of materials would be activated if redevelopment were to occur and new build would be likely to be more energy efficient as specified within the policy framework.	- Re-use of building or materials and improved energy efficient build
	PTAL / local access to facilities	3-4 (moderate – good) / excellent (metropolitan centre <400m west)		
	Freight access by water or rail (e.g. for construction)	NA		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	<1km to existing, <500m to potential		
8. To improve air and water quality	Proximity to water bodies / SPZs	No / SPZ3	Allocation unlikely to introduce harmful uses, given good access to transport and facilities, allocation would not be expected to significantly increase the number of journey by private motor vehicle (with associated implications for air quality).	- Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Yes		
	PTAL	3-4 (moderate – good)		
	Likelihood of land contamination	Normal	Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water runoff.	
	Impact on trees / GS	Minimal (one mature tree on site)		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of	PTAL	3-4 (moderate – good) across the site	Allocation would seek to promote sustainable transport with any use on the site. The site's location near to a Sustainable Travel Opportunity Area (STOAs), within an identified congestion zone and along a movement corridor,	- Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and

transport			<p>policies would support mitigation measures to reduce journeys made by car and sustainable transport with this scheme.</p> <p>The good accessibility of the site would be expected to be utilised and designed in to promote sustainable travel including walking and cycling which would overall have a positive impact on this indicator.</p> <p>As such proposals would be expected to address the cumulative impacts to promote sustainable travel as per SP2, SP3, SP7, SP8, SP9, INF2.</p>	reliability (INF1, INF2, SP1, SP2, SP3 and SP8)
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst conversion/redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / Proximity to waste facilities	Good, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	FZ1	Given policy framework as scoped, re-development/conversion would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	- SUDS to improve local flood resilience
	CDA	No		
	TE2100 strip	No		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<400m (West Ham Park)	Given the lack of greening on site at present, conversion/redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	- Implementation of biodiversity / GI policies
	Aerial review of site greening	Single mature tree		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character	Nearest CA	Within University Conservation Area,	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5.	- Protection and enhancement of heritage and character assets described
	Nearest Listed Building (grade)	The Courthouse is a locally listed building		
	Nearest ATV	ATV5 All Saints Church within 800m	Development at a locally listed building in a conservation	

assets	Incongruous / poor quality buildings on site	No	area will be expected to conserve and enhance the courthouse as a non-designated heritage asset. And its location on a quality movement corridor/linear gateway presents the opportunity for enhancement in line with policy objectives through good design.	
	APA	Tier 2		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Romford Road is a Quality Movement Corridor and Linear Gateway		

Royal Road (CF10)

Area	1.5ha	Current use	Green infrastructure with no public access or facilities	Approximate Postcode	E16 3JA
Existing allocations	None		Extant permissions	None	
Existing designations	Greens infrastructure (GS307), Flood Zone 2 & 3				
Proposed allocation	<ul style="list-style-type: none"> Community Facility (Education) 		Alternative options not taken forward (see Social Infrastructure OA)	<ul style="list-style-type: none"> No allocation 	

Summary Assessment (more details in the table below)

Allocation for educational use to meet pupil place planning requirements supporting projected population growth partly derived from new development is expected to have, over the longer term, a positive effect not only on socio-economic related IIA objectives, but also on those relevant to successful places and local character: given that the site is presently fenced off, it can be considered to be under-used. Whilst there may be a quantitative reduction in green infrastructure, there is scope to secure qualitatively superior provision with public access, as well as meeting wider community space requirements through flexible design – these mitigating features are provided for within the existing policy framework. A community facility with an element of housing allocation could support housing, and place-making/sustainable community objectives, including local environmental improvements, through helping to bring forward a viable community use at the site, making better use of the site and securing better integration with the wider context providing this can be achieved alongside the green infrastructure requirements. Opportunities presented through new development and associated investment through the application of other policies, proposed and adopted, will be important to make improvements on the status quo to convergence, sustainable travel, wider environmental performance, and prevent any negative impacts, notably to noise exposure and air quality, runoff, biodiversity and floodrisk.

Site allocation must address

- Appropriately investigate and address surface water runoff, noise exposure and air quality issues
- Secure sustainable transport access and permeability
- Protection of neighbouring green infrastructure and provision of publicly accessible green space within the site
- Biodiversity protection and enhancement
- Flexible community space within the school.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Education infrastructure provision in this location will assist in the promotion of equality of opportunity for local populations via the potential for upskilling and training – particularly in an area of deprivation.</p> <p>Housing as part of an appropriate mix and choice of uses would be supported by the close proximity to local schools, supporting local needs. The site's close access to numerous employment hubs within the docks provides local access to employment opportunities. However, walkability across the site to connect with opportunities will be important to address the low PTAL. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	2-3 (poor-moderate)		
	Proximity to employment land	SIL within 1200m LIL within 1200m LMUA within 1200m Employment Hub within 100m Town Centre within 1200m		
	Proximity to schools	Primary adjacent. Secondary adjacent.		
2. To support healthier lifestyles	Health facilities	GP < 1mile, Newham General Hospital < 1mile	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and DLR/bus access) noise mitigation is enhanced and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of community facility uses are particular opportunities.</p>	<ul style="list-style-type: none"> - Protect or replace the greenspace on the site in order to mitigate - Secure sustainable transport access and permeability
	Green Space	Surrounded by		
	Distance to nearest Town centre or local centre	Cundy Road LSP ~450m, Freemasons Road LC ~900m, East Beckton District Centre ~1k		
	Sports facilities; opportunities for active travel	Close to substantial parks and Docks		
	Hot food Takeaway Hotspot/access to fresh healthy food	No HFT hotspots, see above for retail access		
	Noise levels	High		
	Air Quality	Adjacent		
	Likelihood of	Normal		

	Land contamination			
3. To create successful neighbourhoods	Proximity to community facilities	Adjacent to schools, close to parks with sports facilities, and city farm	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, provided noise mitigation is maintained or enhanced and walkability is designed in. The site is within a ten minute walk of a range of facilities, including schools which are adjacent to the site, and is well served by public transport which connects the site to a number of district and major centres within the borough. The provision of housing on this site would improve local housing mix and make better use of an under-used site.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Cundy Road LSP ~450m, Freemasons Road LC ~900m, East Beckton District Centre ~1k		
	PTAL	2-3 (poor-moderate)		
	Under-used / derelict land	Yes		
	Noise	High		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-3 (poor-moderate)	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix. Opportunities exist to improve walkability (to and within the site) and the connection to walking/cycling routes (to mitigate the poor PTAL rating).	<ul style="list-style-type: none"> - Walkability/local connectivity improvements
	Neighbouring Uses	Residential, school, allotments		
	Walkability	Fair		
5. To foster sustainable economic growth	PTAL	2-3 (poor-moderate)	Allocation would support this objective through the provision of education facilities which in turn has implications in the longer term to improve educational attainment, skill development contributing to improving both personal and economic resilience and address the educational needs for a growing population. Overall allocation would promote economic growth that helps address deprivation and reduces inequality for Newham's residents through the provision of community facilities that are designed to develop new communities who live, work and access the area and support the growing needs of the population.	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/8). - Activation of the successful place policies will seek to help create a high quality environment to support this objective - Educational
	Allocation likely to disrupt employment generating use or support it	Create new employment generating use		
	Allocation likely to provide net additional space for employment generating use	Yes		
	Access to freight network (road / rail / water)	Very good		

				attainment J3
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Loss unmaintained open space in well served area, gain of community facilities	Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF6/8, access to greenspace would be further enhanced through the improvement of connections to the surrounding greenspace which does not currently grant public access. Cundy Park and Beckton District Park are also located within a five minute walk of the site. The close proximity of the site to Prince Regent DLR and bus station means that a wider range of facilities and greenspace are easily accessible via public transport.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/8).
	Sufficiency data / Potential for gain in underserved locations	Yes, site identified as part of pupil place planning		
	Scope for visibility/other improvements to existing facilities	Redevelopment may provide opportunity for enhancements of allotments or to link into Royal Docks Community School site, with potential benefits for enhanced access		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes (land is notably under-used)	As land is not publically accessible or in use it can reasonably be considered under-used, allocation for much-needed community facility uses would constitute a more efficient use of scarce land resources. The location has acceptable access to transport and existing facilities making it a logical site for development.	- Improved efficiency of land use - Implementation of energy use and energy efficient build policies
	PTAL/local access to facilities	2-3 (poor-moderate) / Moderate (Cundy Road LSP ~450m, Freemasons Road LC ~900m, East Beckton District Centre ~1k)		
	Freight access by water or rail (e.g. for construction)	Very good		
	Scope for re-use of buildings / materials	No		
	Proximity to heat network	>500m of potential DH line		
8. To improve air and water quality	Close to water bodies / SPZs	Neither	Given the reasonable public transport access of the site and likely local catchment of a community facility use, allocation would be considered	- Protection of tree cover, activation of air
	AQMA	No, though whole borough		

		likely to be designated	unlikely to significantly increase the number of journeys made by private vehicle and would certainly be unlikely to increase freight movements – as such any associated negative impacts on air quality would be negligible. Provided activation of GI, biodiversity, air quality and SUDS requirements, allocation can at least maintain air and water quality, and likely improve it.	<ul style="list-style-type: none"> - quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	PTAL	2-3 (poor-moderate)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Yes		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2-3 (poor-moderate)	<p>There is a risk that allocation would increase the proportion of trips by car to the site. The site presents some challenges in terms of access to the site in which investment through strategic infrastructure (INF1) alongside the activation of measures to promote sustainable modes (INF2) of transport would be key to mitigating any negative impacts on this objective. With educational uses, the importance of travel plans to ensure sustainable travel is secured is essential to support the shift towards more sustainable modes.</p> <p>Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p>	<p>Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will</p> <ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management.	<ul style="list-style-type: none"> - Implement waste management requirements
	Access to road network / proximity to waste facilities	Good, adjacent to A112		
11. To minimise and reduce flood	Flood zone	FZ 2-3	Incorporation of SUDS as required by scoped policies will serve to minimise and mitigate surface water run-off. As per the policy	<ul style="list-style-type: none"> - SUDS to address local drainage

risk	CDA	No	framework development would not be permitted where it might worsen flood risk to any location.	- Relevant flood risk assessment and mitigation including water-sensitive design
	TE2100 strip	No		
	Proportion of impermeable surface	Fully permeable		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Adjacent (Ham Creek Wood, SINC12)	While the site is green space it is not maintained, is low-lying scrub- and has not been identified as providing any specific habitat or species. Activation of relevant policies will mean that offer can be improved while allowing for development.	- Implementation of relevant policies
	Aerial review of site greening	Fully grassed, quite scrubby, very few trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	East Ham CA beyond 2000m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site does not raise character or heritage issues.	- None
	Nearest Listed Building (grade)	Connaught Tavern, Grade II within 400m		
	Nearest ATV	ATV5 All Saints Church beyond 2000m		
	Incongruous / poor quality buildings on site	None		
	APA	Tier 3		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	No		

Tunmarsh Centre (CF16)

Area	0.92ha	Current use	Education	Approximate Postcode	E13 9ND
Existing allocations	None		Extant permissions	None	
Existing designations	Green Space, Critical Drainage Area, Traffic Congestion Zone, Licensing Saturation Zone / HFT & Betting Shop concentrations				
Proposed allocation	Community facility (education)		Alternative options not taken forward (see Social Infrastructure OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the accessible location and scale of the site, a community-facility-with-housing allocation could support housing and place-making/sustainable communities objectives, including local character improvements, through helping to provide a viable and thus sustainable community use (education) addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate mix and densities, optimising the site's potential whilst being sensitive to local context.
- The securing of sustainable transport access and site permeability.
- Greenspace considerations.
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	40% most deprived	<p>Ensuring continuation of community facility provision at this location will promote equality of opportunity via access to services and facilities.</p> <p>Housing as part of an appropriate mix and choice of uses would also be supported by the proximity to local schools and potential social infrastructure on site, supporting local needs. The site's access to an employment hub provides some access to local employment opportunities and good transport links provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	4 (good)		
	Proximity to employment land	SIL beyond 1200m LIL within 1200m LMUA within 800m Employment Hub within 400m Town Centre Within 1200m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Greengate Medical Centre is within 400m. Newham University Hospital is within 800m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of social infrastructure are particular opportunities.</p>	<ul style="list-style-type: none"> - Protect or replace the greenspace on the site in order to mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	Intersecting GS181. SINC, MOL and Local Park within 400m, Pocket Park adjacent to the site.		
	Distance to nearest Town or Local Centre	Within 400m of Greengate Local Centre		
	Sports facilities; opportunities for active travel	Newham Leisure Centre within 800m. Local walking and cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food?	Located in a hot food takeaway hotspot (3). Access to fresh, healthy		

		food in Greengate local centre which is within 400m of the site. Canning Town is easily accessible by public transport and provides access to a greater number of outlets where fresh, healthy food can be accessed.		
	Noise levels	Low levels of noise exposure		
	Air Quality	Not Located in an AQMA		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary within 400m Secondary within 400m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, on condition that onsite community facility is re-provided, noise mitigation is maintained and walkability is designed in. The site is within a five minute walk of a range of facilities. The provision of housing on this site would provide an increase in population that would support the businesses in the nearby local centre which would make the viability of the neighbourhood sustainable.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 400m of Greengate Local Centre		
	PTAL	4 (good)		
	Under-used / derelict land	No		
	Noise	Low levels of noise exposure		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4 (good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.	- None
	Neighbouring Uses	Residential, greenspace.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4 (good)	Allocation would support the provision of community facilities with some employment generation through the school. The option supports the wider strategy in the delivery of successful places by seeking to protect	Mitigation measures to protect employment at this location will be subject to tests against the managed release criteria
	Allocation likely to disrupt existing active business	Yes – school (employment generation)		

	Allocation likely to provide net additional space for business use	No – Although some education based community uses would be protected on site which may have employment generating uses	some social infrastructure use on site as part of a mix including residential development, thus delivering homes closely aligned to community facilities. Additional population in the area would support local businesses including expenditure in the nearby local centre and add to the pool of local labour.	including: - Consistency with spatial strategy - Supporting regeneration objectives
	Access to freight network (road / rail / water) including any known junction/highway issues	Excellent access to roads. Poor access to rail and water.	As such allocation would have a positive impact on opportunities to improve personal and economic resilience through new jobs and homes in the area through a mix of uses.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF6/8. Access to greenspace would be further enhanced through the improvement of connections to the greenway which is located to the south of the site.	- Ensure access across the site to existing facilities/ new provision to meet needs (activation of INF6/8).
	Sufficiency data? / Existing Provision	Greenspace: Intersecting GS181. SINC, MOL and Local Park within 400m, Pocket Park adjacent to the site. Education facilities: Nursery, Primary and Secondary Schools within 400m. Medical facilities: Greengate Medical Centre is within 400m. Newham University Hospital is within 800m. Childcare: Plaistow South provides below the borough average in relation to childcare		

		places for both under 5s and those in the 5-14 years age range. Custom House which is adjacent to Plaistow South has above the borough average provision in relation to childcare.		
	Scope for visibility/ other improvements to existing facilities?	Tunmarsh Centre		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL/local access to facilities	4 (good)	Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility.	
	Freight access by water or rail (e.g. for construction)	Not relevant		
	Scope for re-use of buildings / materials	Some	New builds are likely more energy efficient than existing buildings, as specified within the policy framework.	
	Proximity to heat network	Beyond 1200m		
8. To improve air and water quality	Proximity to water bodies / SPZs	No	Allocation unlikely to introduce harmful uses, given good access to transport and facilities, allocation would not be expected to significantly increase the number of journey by private motor vehicle (with associated implications for air quality) over existing use.	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Within 400m		
	PTAL	4 (good)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Yes - Some mature trees lining the site to the west and north		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the	PTAL	4 (good)	Allocation presents an opportunity to promote	- Reduce dominance of car-

proportion of journeys made by sustainable modes of transport			<p>sustainable modes of transport at this location. Application of sustainable travel policies will seek to encourage sustainable travel options with development, including walking and cycling, to better connect the site to the wider areas. As access to the site is narrow and convoluted, improved pedestrian and cycle routes to and from the site would be sought to support an increase in the pattern of movement by more sustainable modes.</p> <p>Allocation will support improved connectivity between the site and the Greenway, which will support its usage for walking and cycling alongside militating against the cumulative impacts of congestions. Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably in INF2, SP2, SP8, SP10) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p>	<p>based access and improve sustainable travel connectivity, capacity and reliability (INF1, INF2, SP2, SP3, SP8, SP10)</p> <ul style="list-style-type: none"> - Activation of Greenspace connectivity (SP1, SP2, SP3, INF1, INF2, INF6) - Ensure access across the site to existing facilities/ new provision to meet needs (activation of INF6/8)
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators?	No	<p>Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.</p>	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	<p>Given policy framework as scoped, re-development would not worsen flood risk to this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.</p>	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	Yes		
	TE2100 strip	No		
	Proportion of impermeable surface	60%		

12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m.	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	- Implementation of biodiversity / GI policies
	Aerial review of site greening	Green space, some mature trees along Kent Str & Beaumont Rd		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Sugar House Lane CA beyond 1200m	Development of the site does not raise any heritage or character issues.	- None
	Nearest Listed Building (grade)	Tramway Workers War Memorial, Greengate St Grade II within 400m		
	Nearest ATV	ATV5 All Saints Church Within 1200m		
	Incongruous / poor quality buildings on site	No		
	APA	No		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	No		

NCFE Welfare Road (CF18)

Area	1.54ha	Current use	Newham College of Further Education, Stratford Campus	Approximate Postcode	E15 4HT
Existing allocations	None		Extant permissions	None	
Existing designations	Access to nature deficiency, Licensing Saturation Zone, HFT/BS concentrations, APA (Tier 2)				
Proposed allocation	Community facility and Residential (non-strategic)		Alternative options not taken forward (see Social Infrastructure OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's scale and accessible location, a site comprising education community floorspace (delivered in accordance with identified local need) together with an element of residential could support housing, place-making and sustainable communities objectives including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies.

Site allocation must address:

- Flood risk issues (via appropriate investigation).
- High quality design that incorporates the appropriate mix and densities, taking into account the fairly accessible location and optimises the site's potential, whilst being sensitive to the site's context.
- The securing of sustainable transport access and permeability (providing linkage to West Ham Lane recreation ground).
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Ensuring the continuation of education infrastructure provision in this location will continue to promote equality of opportunity for local populations via the potential for upskilling and training – particularly in an area of higher deprivation.</p> <p>Housing as part of the mix of uses would also be supported by the close proximity to local schools and other social infrastructure (within the town centre) that supports local needs, and could be brought forward on the site as part of an appropriate mix and choice. The site's close access to the town centre and employment hub also provides local access to employment opportunities. The extensive transport links in Stratford will also provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	2-4 (poor – good)		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 400m Town Centre Within 400m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Vicarage Lane Medical Centre within 400m. CFOA within 400m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of social infrastructure are particular opportunities.</p>	<ul style="list-style-type: none"> - Protect or replace the greenspace on the site in order mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC, Pocket and Local Park within 400m. MOL within 1200m.		
	Distance to nearest Town centre or local centre	Local Centre within 400m, Metropolitan Centre within 800m.		
	Sports facilities; opportunities for active travel	Atherton Leisure Centre within 1200m. Local walking and cycling network adjoins the site.		
	Hot Food Takeaway Hotspot/access to fresh healthy food	Located in a Hot Food Takeaway Hotspot (3). Limited food offer in the Local		

		centre located within 400m but Stratford Metropolitan Centre is within 800m and has a wide array of fresh, healthy food outlets.		
	Noise levels	Low		
	Air Quality	Not in an AQMA		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, provided the onsite community facility is re-provided, noise mitigation is maintained and walkability is designed in. The site is located within a five minute walk of Vicarage Lane Local Centre and a ten minute walk of Stratford Metropolitan Centre where a range of facilities can be accessed. The provision of housing on this site would provide an increase in population that would support the businesses in the nearby local centre which would make the viability of the neighbourhood more sustainable. It also provides the opportunity to improve the visual appearance of the area through redevelopment of the site which would have a positive impact on the amenity of the neighbourhood.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 400m of Vicarage Lane Local Centre		
	PTAL	2-4 (poor – good)		
	Under-used / derelict land	No		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-4 (poor – good)	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix. Whilst walkability is good, opportunities exist to boost walkability within the site, further improving the connection to walking/cycling routes and public transport, improving upon areas where lower PTALs occur.	- Walkability improvements.
	Neighbouring Uses	Church, residential, community centre.		
	Walkability	Good		
5. To foster	PTAL	2-4 (poor – good)	Allocation would support this objective through the	- Ensure access across the site to existing facilities/new provision to

sustainable economic growth	Allocation likely to disrupt existing active business	Yes – Newham College, Stratford Campus (employment generating)	<p>continuation of education facilities at the site which in turn has implications in the longer term for the improvement of educational attainment and skill development contributing to improvement of both personal and economic resilience and thus addressing the educational needs of a growing population.</p> <p>Associated residential development by providing additional population in the area would support local businesses through expenditure in the nearby local centre and expansion of the pool of local labour.</p> <p>Overall allocation would promote economic growth that helps address deprivation and reduces inequality for Newham’s residents through the provision of social infrastructure and housing that is designed to develop new communities who live, work and access the area and support the growing needs of the population.</p>	<p>meet needs (activation of INF6/8).</p> <ul style="list-style-type: none"> - Activation of the successful place policies will seek to help create a high quality environment to support this objective - Educational attainment J3
	Allocation likely to provide net additional space for business use	No – Although some education based community uses would be protected on site which may have employment generating uses		
	Access to freight network (road / rail / water)	Poor – The site itself is accessed via smaller B roads which would present challenges in terms of freight access. Subsequently this presents poor access to the site via water and rail.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Newham College of Further Education	<p>Good access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF7/8. Stratford Park (Local) and West Ham Park (District) are located within a five minute walk of the site.</p>	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6). - Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. residential properties to the north, west and south)
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC, Pocket and Local Park within 400m. MOL within 1200m.</p> <p>Medical: Vicarage Lane Medical Centre located within 400m.</p> <p>Education: Primary and Secondary school located within 400m.</p> <p>Childcare: West Ham provides the borough average in relation to under 5’s childcare and for those in the 5-14 year age range. However, West</p>		

		Ham is adjacent to Stratford and New Town which provides above the borough average for both age groups.		
	Scope for visibility/other improvements to existing facilities	Scope to improve the quality of the education provision that would be retained onsite		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Potential for some building re-use depending on proposals, policies promoting re-use and recycling of materials should be activated. New build likely to be more energy efficient than current position as specified within the policy framework. Redevelopment should comprise a more efficient use of the land commensurate with its good public transport and excellent town centre accessibility.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL / local access to facilities	2-4 (poor - good) / excellent (Vicarage Lane Local Centre <100m, Stratford Metropolitan Centre <400m)		
	Freight access by water or rail (e.g. for construction)	Moderate access to wharves via road network, subject to capacity		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	<500m to potential, <1km to existing DH lines		
8. To improve air and water quality	Close to water bodies / SPZs	No / SPZ3	Allocation would not introduce harmful uses (industry / freight), and given good access to transport and facilities would not be likely to significantly increase the number of journeys by private motor vehicle. As such, allocation would not worsen air or water quality and has the potential to improve the quality of surface water run-off (through incorporation of SUDS).	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	No, though all of borough likely to be designated		
	PTAL	2-4 (poor – good)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Mature trees scattered across site		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by	PTAL	2-4 (poor – good)	Allocation presents an opportunity to promote sustainable modes of transport at this location. Application of sustainable travel policies will seek to	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel

sustainable modes of transport			<p>encourage sustainable travel options with development including walking and cycling to better connect the site to the wider areas. Access to the site is narrow and convoluted, in which improved pedestrian and cycle routes to and from the site would be sought to support an increase in the pattern of movement by more sustainable modes.</p> <p>As such, the allocation of this site would have a positive impact on the objectives set out in this indicator.</p>	connectivity, capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Medium (allocation unlikely to significant alter this position).		
	Access to road network / Proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	FZ1	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	95% (small patch of grass and a handful of mature trees)		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<400m	Given the relative lack of greening on site at present, redevelopment provides the opportunity to improve the offer through activation of relevant biodiversity requirements. Policy framework as scoped would protect mature trees or require re-provision.	- Implementation of biodiversity / GI policies (including protection of mature trees)
	Aerial review of site greening	Some mature trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and	Nearest CA	Stratford St Johns CA is within 400m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	The Old Dispensary, 30 Romford Road Grade II within		

enhancing heritage and other character assets		400m	does not raise heritage issues.	
	Nearest ATV	ATV5 All Saints Church within 400m		
	Incongruous / poor quality buildings on site	NO		
	APA	Tier 2		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes		

Former Rainbow Centre (CF23)

Area	0.23ha	Current use	Vacant land (previous structure already demolished)	Approximate Postcode	E6 3LB
Existing allocations	None		Extant permissions	None	
Existing designations	Tier 2 APA				
Proposed allocation	Community facility		Alternative options not taken forward (see Social Infrastructure OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, a community-facility-with-housing allocation could support housing and place-making/sustainable communities objectives, including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. The site's location adjacent to a school site in particular lends itself to such a use and given its out of centre location and limited accessibility, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate mix and densities, optimising the site's potential whilst being sensitive to local context.
- The securing of sustainable transport access, site connectivity, and permeability.
- Flood risk issues.
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	Community facility provision in this location provides an opportunity to promote equality of opportunity via access to services compared to the current situation. Housing as part of an appropriate mix and choice of uses would also be supported by the close proximity to local schools and any social infrastructure (including community facilities) provided on site. However, access to employment opportunities is more limited in this area. Investment more generally in whatever form would benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).	- Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	1b (very poor)		
	Proximity to employment land	SIL beyond 1200m LIL beyond 1200m LMUA within 800m Employment Hub within 800m Town Centre within 1200m		
	Proximity to schools	Primary adjacent Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Newham University Hospital, Gateway Surgical Centre and Newham Centre for Mental Health within 800m.	Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of community facilities are particular opportunities.	- Secure sustainable transport access and permeability
	Green Space	MOL and SINC within 400m, Pocket and Local Park within 800m.		
	Distance to nearest town or local centre	Local centre within 800m		
	Sports facilities; opportunities for active travel	Newham Leisure Centre within 800m. Local cycling and walking network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Not located within a hot food takeaway hotspot.		
	Noise levels	Low		
	Air Quality	Not located in an AQMA		
	Likelihood of land	Normal		

	contamination			
3. To create successful neighbourhoods	Proximity to community facilities	Within 800m	Overall this site provides a good opportunity to create successful neighbourhoods, provided walkability is designed in and noise mitigation is maintained. The bus is within a five minute walk of the site and offers connections to Stratford Metropolitan Centre, Green Street District Centre, East Ham Major Centre and Manor Park local centre. The site is well served by the road network. The introduction of housing on this site would improve local housing mix and choice.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 800m of High Street South, Boleyn and Greengate Local Centres. Within 1200m of East Ham Major Town Centre.		
	PTAL	1b (very poor)		
	Under-used / derelict land	Yes		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1b (very poor)	<p>The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.</p> <p>Whilst walkability is good, opportunities exist to further improve the connection to walking/cycling routes (Greenway) in order to mitigate the poor PTAL rating.</p>	<ul style="list-style-type: none"> - Walkability/local connectivity improvements
	Neighbouring Uses	Greenspace, primary school, residential		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	1b (very poor)	<p>Allocation of this site would have a positive impact on economic sustainability. Allocation will present opportunities to improve personal and economic resilience and support growth through the provision of providing adequate community facilities and homes to meet the needs of a growing population and facilitate a vibrant and strong community within Newham.</p> <p>Moreover, partial residential development of the site would bring additional population to the area which would support local businesses, including through expenditure and adding to the pool of local labour.</p>	<ul style="list-style-type: none"> - Activation of INF8/10 will ensure the re-provision of a community facility use based on identified local need - Activation of the successful place policies will seek to help create a high quality environment to retain and attract employment.
	Allocation likely to disrupt existing active business	No		
	Allocation likely to provide net additional space for business use	No		
	Access to freight network (road / rail / water) including any known junction/highway issues	Good access to road network, poor access to rail and water.		
6. To ensure	Loss of community facility or open space	None	Good access to facilities which would be improved by	<ul style="list-style-type: none"> - Ensure access across the

inclusive access to a range of high-quality community facilities and open space	Sufficiency data? / Existing Provision	Primary School adjacent to the site, Secondary School within 400m. Newham University Hospital, Gateway Surgical Centre and Newham Centre for Mental Health within 800m. East Ham South provides below the borough average in relation to childcare spaces for both under 5s and those in the 5-14 year age range. However, Beckton is adjacent to East Ham South and provides above the borough average in relation to childcare for these age ranges.	the proposed new local centre in Plaistow. Allocation would not have a negative impact in relation to inclusive access to community facilities. Scope to address any deficiencies arising as per INF8.	site to existing facilities/new provision to meet needs (activation of INF8).
	Scope for visibility/ other improvements to existing facilities?	None		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	The land is previously developed but not now in use, allocation for much-needed community facility and residential uses would constitute a more efficient use of scarce land resources. While the public transport and existing facilities accessibility of the site is relatively poor, allocation would enhance facilities offer and could seek enhancements to transport access. Catchment for community facilities use is likely to be local. Allocation and development provides for activation of efficiency requirements related to build	<ul style="list-style-type: none"> - Improved efficiency of land use - Implementation of energy use and energy efficient build policies
	PTAL / local access to facilities	1b (very poor) / poor (>700m to nearest Local Centre, High St South, >1k to East Ham TC)		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via road network		

	Scope for re-use of buildings / materials	No	quality and energy use.	
	Proximity to heat network	Significantly > 1k from either potential or existing		
8. To improve air and water quality	Close to water bodies / SPZs	No / no	Air quality impacts are likely to be minimal, allocation would not increase freight movements, and while public transport access is currently poor, allocation would seek to deliver enhancements.	<ul style="list-style-type: none"> - Protection of tree cover, activation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	No, though whole borough likely to be designated		
	PTAL	1b (very poor)	Provided activation of GI, biodiversity, air quality and SUDS requirements, allocation can at least maintain air and water quality, and likely improve it.	
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Some, grassed areas and a few mature trees (adjacent to designated GS / park)		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	1b (very poor)	<p>There is a risk housing as well as community facility uses may increase trip generation by car given the low accessibility level, in which small scale changes would be incorporated through activation of sustainable transport policies would seek to mitigate this. Opportunities would be sought to improve access to public transport including the bus service, as the site does not benefit from any nearby bus stops or stations.</p> <p>Redevelopment offers the opportunity to further promote sustainable modes and given the proximity to the school, allocation would support this objective to promote walking and cycling to and from this location.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability

10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management.	- Implement waste management requirements
	Access to road network / Proximity to waste facilities	Good, 2.5k by road to Jenkins Lane		
11. To minimise and reduce flood risk	Flood zone	FZ1	Incorporation of SUDS as required by scoped policies will serve to minimise and mitigate surface water run-off. As per the policy framework, development would not be permitted would it worsen flood risk to any location.	- SUDS to address local drainage - Relevant flood risk assessment and mitigation including water-sensitive design
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	Half		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<150m (Greenway)	While the site provides some greening it has not been identified as providing any specific habitat value. Activation of relevant policies will mean that the biodiversity offer can be improved whilst still allowing for development.	- Implementation of relevant policies
	Aerial review of site greening	Grass patches, few mature trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	East Ham Town Centre within 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Development should complement and integrate Brampton Park.	- Protection and enhancement of heritage and character assets described
	Nearest Listed Building (grade)	The Royal Standard, Brooks Avenue – locally listed terrace housing. New City Primary School, New City Road – locally listed		
	Nearest ATV	ATV6 Rancliffe Road within 800m		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 2		

	Proximity to ACV	n/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes		

Former Upton Centre / One Love Site (CF24)

Area	0.4ha	Current use	Vacant	Approximate Postcode	E13 ORB
Existing allocations	None		Extant permissions	None	
Existing designations	Access to Nature Deficiency, HFT Hotspot				
Proposed allocation	Community facility and Residential (non-strategic)		Alternative options not taken forward (see Social Infrastructure OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the fairly accessible location and scale of the site, a community-facility-with-housing allocation could support housing and place-making/sustainable communities objectives, including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate mix and densities, optimising the site's potential whilst being sensitive to local context.
- The securing of sustainable transport access and site connectivity.
- Noise/ neighbourliness (via appropriate investigation).
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>Community facility provision in this location provides an opportunity to promote equality of opportunity via access to services compared to the current situation.</p> <p>Housing within the mix uses would also be supported by the close proximity to local schools and other social infrastructure (including community facilities) in the town centre to support local needs, and could be brought forward on the site as part of an appropriate mix and choice. The site's close access to the town centre and employment hub provides local access to employment opportunities and transport links here provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	3 (moderate)		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 400m Town Centre within 400m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Plasnet Medical Practice, Boleyn Medical Practice and a Pharmacy located within 400m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of community facilities are particular opportunities.</p>	<ul style="list-style-type: none"> - Incorporate green space into the site in order to mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC within 400m, Pocket Park within 800m, Local Park and MOL within 1200m.		
	Distance to nearest Town or Local Centre	Town Centre within 400m		
	Sports facilities; opportunities for active travel	Local Walking and Cycling network adjacent to the site.		
	Hot Food Takeaway Hotpot/access to fresh, healthy food?	Located in a hot food takeaway hotspot (3). Green Street District Centre within 400m		

		where fresh, healthy food can be accessed from a number of outlets.		
	Noise levels	Low to high, highest along the northern boundary of the site.		
	Air Quality	Not located in an AQMA		
	Likelihood of land contamination	Low		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods. In order to create a successful neighbourhood; noise mitigation should be enhanced and walkability designed in to the site. There is the opportunity to provide a modern community facility for the benefit of the neighbourhood and improve the local housing mix in a location that is well connected via the public transport network and is within a five minute walk of Green Street District Centre.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Green Street town centre within 400m and Terrace Local Centre within 800m		
	PTAL	3 (moderate)		
	Under-used / derelict land	Partially demolished		
	Noise	Low to high, highest along the northern boundary of the site.		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	3 (moderate)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix. Whilst walkability is good, opportunities exist to boost walkability within the site, further improving the connection to walking/cycling routes and public transport, improving upon areas where lower PTALs occur.	- Walkability improvements.
	Neighbouring Uses	Residential, commercial (retail, place of worship).		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	3 (moderate)	Allocation would ensure the protection of some community uses on site, whilst options will seek to promote a mix of uses and would support this	- Mitigation measures to protect employment at this location will be
	Allocation likely to disrupt existing active	No - vacant community facility		

	business		objective of the delivery of homes aligned with the delivery of community facilities as part of the wider strategy in the delivery of successful places. Allocation is likely to activate an existing community facility as part of a mixed use development.	subject to tests against the managed release criteria including:
	Allocation likely to provide net additional space for business use	Yes– including reprovion of community facility		- Consistency with spatial strategy
	Access to freight network (road / rail / water)	Reasonable access to principal road network (A113). Site served primarily by B roads. Access to wharves and rail is served via the road network.	Additional population in the area would support local businesses and add to the pool of local labour. Overall allocation would have a positive impact on opportunities to improve personal and economic resilience through new jobs and homes in the area through a mix of uses.	- Supporting regeneration objectives - Community facilities policies to ensure co-ordination with infrastructure and facilities
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	None	Good access to a range of facilities, it is less than a ten minute walk to Green Street town centre, and there is scope within scale of site to address any deficiencies arising as per INF8. West Ham Park (District) is located within a five minute walk.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8).
	Sufficiency data? / Existing Provision	Greenspace: SINC within 400m, Pocket Park within 800m, Local Park and MOL within 1200m. Medical: Plashet Medical Practice, Boleyn Medical Practice and a Pharmacy located within 400m. Education: Nursery, Primary and Secondary School located within 400m. Childcare: Plaistow North provides below the borough average in terms of childcare places for both under 5s and those in the 5-		

		14 years age range. However, Plaistow North is located adjacent to Canning Town North which provides above the borough average.		
	Scope for visibility/ other improvements to existing facilities?	None		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated. Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility. New buildings are likely more energy efficient than existing buildings, as is specified within the policy framework.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL/local access to facilities	3 (moderate) / ~400m to Green St District Centre		
	Freight access by water or rail (e.g. for construction)	Reasonable access to local wharves via road network		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	>1km exiting, >500m potential		
8. To improve air and water quality	Close to water bodies / SPZs	No	Allocation unlikely to introduce harmful uses, given reasonable access to transport and facilities, allocation would not be expected to significantly increase the number of journeys by private motor vehicle (with associated implications for air quality) over the existing use. Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	No, although whole borough likely to be designated		
	PTAL	3 (moderate)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Potential		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the	PTAL	3 (moderate)	Development at this location may increase the	- Reduce dominance of car-

proportion of journeys made by sustainable modes of transport			<p>proportion of journeys made by car which may have some negative impact on the surrounding road network. As such the activation opportunities to promote sustainable modes across the mix of uses including improved walking and cycling routes. As with all schemes the promotion of high quality cycle facilities would be designed in.</p> <p>To the west of the site is an identified congestion zone in which opportunities would be sought to mitigate the cumulative impacts on this location and improvements to the quality along the movement corridor.</p>	<p>based access and improve sustainable travel connectivity, capacity and reliability.</p> <ul style="list-style-type: none"> - Through activation of sustainable transport policies as scoped (notably SP2, SP7, SP8, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1), allocation at this location is likely to have a positive impact on this indicator.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Moderate, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and	Proximity to SINC	<400m, West Ham Park	Given the lack of greening on site at present,	<ul style="list-style-type: none"> - Implementation of

protect existing habitats and biodiversity	Aerial review of site greening	Some trees along the boundary of the site	redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	biodiversity / GI policies
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Forest Gate Town Centre CA within 1200m	Development would not raise issues of heritage or local character.	- None
	Nearest Listed Building (grade)	Locally listed buildings within 400m at 1A and 35-43 Plashet Road, and Harold Road Centre, Harold Road.		
	Nearest ATV	Forest Gate within 1200m		
	Incongruous / poor quality buildings on site	No		
	APA	no		
	Proximity to ACV	n/a		
	Potential to enhance other character assets (parks, stations etc.)	West Ham Park		

Manor Park Community Centre (CF25)

Area	0.039ha	Current use	Community Centre	Approximate Postcode	E12 6QN
Existing allocations	No		Extant permissions	No	
Existing designations	CFOA, ATV, Traffic Congestion Zone, APA, Licensing Saturation Zone / HFT & Betting Shop concentrations				
Proposed Allocation	<ul style="list-style-type: none"> Community facility 		Alternative options not taken forward (see Social Infrastructure OA)	<ul style="list-style-type: none"> No allocation Residential Only (non-strategic) 	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's accessible location along a key corridor, a community-facility-with-housing allocation could support housing and place-making/sustainable communities objectives, including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. A housing-only allocation would bring similar opportunities, provided that the loss of the community floorspace were mitigated (as required by existing policies) by equivalent or better provision of community facilities meeting identified local need nearby, allowing for a more efficient, quality network of community facilities (potentially better supporting other objectives if in a more policy-compliant location/flexible use format) and maximising housing delivery benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies and any impacts on heritage consideration would require mitigation. Given its out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate mix and densities, optimising the site's potential whilst being sensitive to local and heritage contexts.
- Flood risk issues.
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.
- Appropriately investigate and address surface water runoff and air quality issues
- High quality design integrating and enhancing neighbouring heritage assets, including townscape.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Ensuring community facility provision continuation in this location will continue to promote equality of opportunity via access to services and facilities, however re-development that would entail the loss of community facility floorspace, would be covered by community facility release criteria (INF10) to mitigate the effects.</p> <p>Housing either as the sole use or as part of an appropriate mix and choice of uses, or would also be supported by the proximity to local schools. Although access to employment opportunities is more limited in this area good transport links here provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies. - Activation of community facility release policies.
	PTAL	4-5 (good-very good)		
	Proximity to employment land	SIL beyond 1200m LIL within 1200m LMUA within 1200m Employment Hub within 1200m Town Centre Within 1200m		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	There are a range of Medical Practice's and a Pharmacy within 400m. Within the boundaries of a CFOA.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of community facilities are particular opportunities.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC and Pocket Park 400m, MOL and Local Park within 1200m.		
	Distance to nearest Town or Local Centre	Local Centre within 400m.		
	Sports facilities; opportunities for active travel	Manor Park Fitness Centre within 400m. Local cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to	Located in a hot food takeaway hotspot (3).		

	fresh, healthy food			
	Noise levels	High		
	Air Quality	Not located within an AQMA.		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Library within 800m. Primary School within 400m and a Secondary School within 800m.	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods. There is the opportunity to provide a modern community facility for the benefit of the neighbourhood and/or to improve the local housing mix in a location that is well connected via the public transport network and is within a five minute walk of Manor Park local centre. In order to create a successful neighbourhood; noise mitigation should be enhanced and walkability designed in to the site.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 400m of Manor Park Local Centre. Within 1200m of East Ham town centre.		
	PTAL	4-5 (good-very good)		
	Under-used / derelict land	No		
	Noise	High		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4-5 (good-very good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix, provided any change of community facility floorspace is adequately mitigated.	<ul style="list-style-type: none"> - None
	Neighbouring Uses	Multi-use games area, commercial (retail), residential, banqueting hall.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4-5 (good-very good)	<p>Allocation would support the economic growth of the Manor Park Local Centre through expenditure. Further to this allocation would provide a mix of uses that would attract people close to opportunities for employment within the MBOA/CFOA and ATV. As such allocation would support the creation a higher quality economic environment to attract new business investment to Manor Park.</p> <p>As such allocation would improve people's access to community facilities and some employment opportunities creating a higher quality environment</p>	<ul style="list-style-type: none"> - Activation of INF8/10 will ensure the protection/ re-provision of a community facility use based on identified local need - Activation of the successful place policies will seek to help create a high quality environment to retain and attract employment
	Allocation likely to disrupt existing active business	Some small business use		
	Allocation likely to provide net additional space for business use	Unlikely, some community space could be re-provided		
	Access to freight network (road / rail / water)	Road access excellent. Rail access excellent (Manor Park Station 5 minute walk). Water access none.		

			for all.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	Potentially loss of existing community centre depending on which option is chosen	There is good access to a range of facilities due to the sites location within a five minute walk of Manor Park Local Centre. East Ham Major Centre is located within a fifteen minute walk or is easily accessed via the bus network. Scope within scale of site to address any deficiencies arising as per INF8. Wanstead Flats is located within a five minute walk of the site.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8).
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC and Pocket Park 400m, MOL and Local Park within 1200m.</p> <p>Medical: There are a range of Medical Practice's and a Pharmacy within 400m.</p> <p>Community: Library within 800m.</p> <p>Education: Primary School within 400m and a Secondary School within 800m.</p> <p>Childcare: Manor Park provides 1 under 5s childcare place per every 7 resident children which is below the borough average and 1 place per 36 resident children in relation to childcare for those in the 5-14 year age range. However, Forest Gate North which is adjacent to Manor Park provides above the borough</p>		

		average.		
	Scope for visibility/ other improvements to existing facilities?	Potentially scope to improve the community centre if re- provided on site		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated. Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility. New builds are likely more energy efficient than existing buildings, as specified within the policy framework.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL / local access to facilities	4-5 (good-very good) / good (Manor Park Local Centre <150m)		
	Freight access by water or rail (e.g. for construction)	Moderate, road across through dense parts of borough		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	Outside buffer zones for existing or potential		
8. To improve air and water quality	Close to water bodies / SPZs	No / SP22	Allocation unlikely to introduce harmful uses, given good access to transport and facilities, allocation would not be expected to significantly increase the number of journey by private motor vehicle (with associated implications for air quality). Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	No but whole borough likely to be designated		
	PTAL	4-5 (good-very good)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	None		
	Disruption of vehicle- heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	4-5 (good-very good)	Allocation of this site for redevelopment would present the opportunity to reduce the dominance of car-based use and better promote sustainable modes of transport, notably including improved access to the nearby Manor Park station, bus routes and the local centre. Investment from Crossrail should also support and improve proportion of journeys by sustainable	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability (INF1, INF2, SP2, SP8, SP10)

			<p>modes to this location.</p> <p>Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably SP6, SP2, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p>	
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	FZ1	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	Whole site is built		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<400m	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage	Nearest CA	Durham Road CA	<p>Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a.</p> <p>Development of site which is occupied by a locally</p>	<ul style="list-style-type: none"> - Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Site is a locally listed building. Coronation Cinema Now Snooker Hall Grade II, and Earl Of Essex Public House		

and other character assets		Grade II adjacent. Several other locally listed buildings along the street.	<p>listed building and located in an ATV raises heritage issues.</p> <p>Building makes contribution to character of the area and should be refurbished for continued use as a community centre and/or residential purposes.</p> <p>Manor Park likely to see significant investment in urban renewal with Crossrail opening in 2018. Preservation of this building will be an asset in the longer term.</p>	
	Nearest ATV	Site is part of Manor Park ATV		
	Incongruous / poor quality buildings on site	No		
	APA	Tier 2		
	Proximity to ACV	n/a		
	Potential to enhance other character assets (parks, stations etc.)	Manor Park Station to the north.		

Katherine Road Community Centre (CF26)

Area	0.96ha	Current use	Community Centre	Approximate Postcode	E7 8PN
Existing allocations	None		Extant permissions	None	
Existing designations	Tier 2 APA, access to nature deficiency / Licensing Saturation Zone / HFT & Betting Shop concentrations				
Proposed allocation	Community facility		Alternatives options not taken forward (see Social Infrastructure OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's reasonably accessible location within a largely residential context, a community-facility-with-housing allocation could support housing and place-making/sustainable communities objectives, including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. A housing-only allocation would bring similar opportunities, provided that the loss of the community floorspace were mitigated (as required by existing policies) by equivalent or better provision of community facilities meeting identified local need nearby, allowing for a more efficient, quality network of community facilities (potentially better supporting other objectives if in a more policy-compliant location/flexible use format) and maximising housing delivery benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- Potential opportunity to secure links through the site to the nearby medical centre.
- High quality design, that incorporates the appropriate mix and densities and achieves positive impacts on the key corridor (helping to better enclose the street), optimising the site's potential whilst being sensitive to local context.
- Flood risk.
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>Ensuring community facility provision continuation in this location will continue to promote equality of opportunity via access to services and facilities, however re-development that would entail the loss of community facility floorspace, would be covered by community facility release criteria (INF10) to mitigate the effects.</p> <p>Housing either as the sole use or as part of an appropriate mix and choice of uses, or would also be supported by the proximity to local schools and other social infrastructure (within the town centre) supporting local needs. The site's location close to the town centre and employment hub provides access to local employment opportunities and transport links here provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies. - Activation of community facility release policies.
	PTAL	3 (moderate)		
	Proximity to employment land	SIL beyond 1200m LIL beyond 1200m LMUA beyond 1200m Employment Hub within 400m Town Centre Within 400m		
	Proximity to schools	Primary adjacent Secondary within 800m		
2. To support healthier lifestyles	Health facilities	East Ham Hospital & Shrewsbury Road Medical Centre within 400m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle under either option, given reasonable proximity to a range of facilities, providing mitigation of noise is secured.</p>	<ul style="list-style-type: none"> - Activate neighbourliness policy.
	Green Space	SINC & Local Park within 400m. Local Park within 800m. MOL within 1200m.		
	Distance to nearest Town or Local Centre	Town Centre within 400m.		
	Sports facilities; opportunities for active travel	Local cycling and walking network within 400m.		
	Hot Food Takeaway Hotspot/access to	Located in a hot food takeaway hotspot (3).		

	fresh, healthy food	Within 400m of Green Street District Centre from where fresh and healthy food is easily accessible from numerous outlets.		
	Noise levels	Medium to high, highest along the western boundary with Katherine Road		
	Air Quality	Not located in an AQMA		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods provided noise mitigation should be enhanced and walkability designed in to the site. There is the opportunity to provide a modern community facility for the benefit of the neighbourhood and/or to improve the local housing mix in a location that is well connected via the public transport network and is within a five minute walk of Green Street District Centre. There is an opportunity to reconfigure the site in order to use the space more efficiently while enhancing the appearance of the local area.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Within 400m of Green Street District Centre		
	PTAL	3 (moderate)		
	Under-used / derelict land	Yes – part single storey building and surface carparking, building could benefit from investment		
	Noise	Medium to high, highest along the western boundary with Katherine Road		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	3 (moderate)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix, provided any change of community facility floorspace is adequately mitigated. Whilst walkability is good, opportunities exist to further improve the connection to walking/cycling routes, to mitigate the poor PTAL rating.	<ul style="list-style-type: none"> - Walkability/ local connectivity improvements
	Neighbouring Uses	Residential, primary school.		
	Walkability	Good		

5. To foster sustainable economic growth	PTAL	3 (moderate)	Allocation of this site would have a positive impact on economic sustainability. Allocation will present opportunities to improve personal and economic resilience and support growth through the provision of providing adequate community facilities and homes to meet the needs of a growing population and facilitate a vibrant and strong community within Newham. Moreover, partial residential development on the site would bring additional population to the area which would support local businesses, including through expenditure and adding to the pool of local labour.	<ul style="list-style-type: none"> - Activation of community facilities policies. - Activation of the successful place policies.
	Allocation likely to disrupt existing active business	Some small business use		
	Allocation likely to provide net additional space for business use	Unlikely unless associated with the community use		
	Access to freight network (road / rail / water)	Road access good. Rail access poor. Water access none.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	Potentially loss of existing community centre depending on which option is chosen	Reasonable access to a range of facilities. Plashet Park (Local) is located within a five minute walk of the site.	<ul style="list-style-type: none"> - Loss of community floorspace would be mitigated by application of community facility policies requiring demonstration that local needs were met elsewhere in the locality and strategic approach was overall of local benefit.
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC & Local Park within 400m. Local Park within 800m. MOL within 1200m</p> <p>Medical: East Ham Hospital & Shrewsbury Medical Centre (could improve local links through site) within 400m.</p> <p>Community: Green Street Library within 400m.</p> <p>Education: Primary School within 400m and Secondary School within 800m.</p>		

		Good childcare sufficiency. New community facility provision planned in Boleyn Ground and could potentially be integrated into re-provision of nearby health facility (see proposed Memorial Hospital site allocation). .		
	Scope for visibility / other improvements to existing facilities?	Potentially scope to improve the community centre if re-provided on site or replaced with improved facilities elsewhere		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated. Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility. New buildings likely more energy efficient than existing buildings, as specified within the policy framework.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL / local access to facilities	3 (moderate) / Good (~400m to Green Street District Centre)		
	Freight access by water or rail	Constrained by road network		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	> 1km to existing or proposed		
8. To improve air and water quality	Proximity to water bodies / SPZs	No / no	Allocation unlikely to introduce harmful uses, given good access to transport and facilities, allocation would not be expected to significantly increase the number of journeys by private motor vehicle (with associated implications for air quality).	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to
	AQMA	No but whole borough likely to be designated		
	PTAL	3 (moderate)		
	Likelihood of land	Normal		

	contamination		Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.	sustainable modes of transport
	Impact on trees / GS	Site is about 1/3 grassed with a couple of mature trees		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	3 (moderate)	<p>There is a risk a mix of uses at this location may increase trip generation by car given the low accessibility level. Small scale changes would be incorporated/designed in through activation of sustainable transport policies would seek to mitigate this.</p> <p>Sustainable travel policies as scoped could help mitigate the likelihood of car-based travel by enhancing the attractiveness of sustainable modes and improving local connectivity.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> - Improve sustainable travel connectivity, - Capacity and reliability - Reduce dominance of car-based access
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Constrained, but area served by LBN waste collection already		
11. To minimise and reduce flood risk	Flood zone	FZ1	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	At least 2/3 of site is impermeable		
12. To enhance and	Proximity to SINC	<300m	Given the lack of greening on site at present,	<ul style="list-style-type: none"> - Implementation of

protect existing habitats and biodiversity	Aerial review of site greening	Grass patches and a few mature trees	redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	biodiversity / GI policies
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Woodgrange Conservation Area within 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Apart from the above development of site does not raise heritage issues.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Duke Of Fife Public House Grade II within 400m.		
	Nearest ATV	Manor Park ATV3 within 1200m		
	Incongruous / poor quality buildings on site	Yes – part single storey/surface carparking, does not help to enclose the street. Building condition would benefit from investment.		
	APA	Tier 2		
	Proximity to ACV	n/a		
	Potential to enhance other character assets (parks, stations etc.)	None.		

Barking Road Centre (CF27)

Area	0.08 ha	Current use	Community Centre		Approximate Postcode	E13 9EZ
Existing allocations	None		Extant permissions	None		
Existing designations	AQMA, traffic congestion zone, Licensing Saturation Zone / HFT & Betting Shop concentrations					
Proposed allocation	Community facility		Alternative options not taken forward (see Social Infrastructure OA)	No allocation		

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's accessible location within a residential context, a community-facility-with-housing allocation could support housing, place-making and sustainable communities objectives including local character improvements, through helping to provide a viable and thus sustainable community use addressing relevant local needs, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- Air quality issues (via appropriate investigation).
- High quality design that incorporates the appropriate mix and densities, taking into account the accessible location and optimises the site's potential, whilst being sensitive to the site's context.
- The securing of sustainable transport access.
- Community facility floorspace delivery in accordance with identified local need.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

I/A Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>Ensuring community facility provision continuation in this location will continue to promote equality of opportunity via access to services and facilities.</p> <p>Housing as part of an appropriate mix and choice of uses would also be supported by the proximity to local schools and other social infrastructure (including community facilities on site and within the town centre) supporting local needs. The site's access to the town centre and employment hub provides access to employment opportunities and transport links provide access to opportunities further afield. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies.
	PTAL	4 (good)		
	Proximity to employment land	SIL beyond 1200m LIL beyond 1200m LMUA within 800m Employment Hub within 800m Town Centre Within 800m		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Greengate and Newham Medical Centres within 800m, Newham University Hospital and a CFOA within 1200m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of community facilities are particular opportunities.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	Local and Pocket Park within 400m, SINC and MOL within 800m.		
	Distance to nearest Town centre or local centre	Local Centre within 400m		
	Sports facilities; opportunities for active travel	Newham Leisure Centre within 1200m. Local cycling network adjacent to the site, local walking network within 400m of the site.		
	Hot food Takeaway Hotspot/access to fresh healthy food	Located in a hot food takeaway hotspot (3). Fresh, healthy food is available from a number of outlets along Barking Road that are		

		within 400m of the site.		
	Noise levels	Low to high levels of noise exposure, highest along the southern boundary of the site		
	Air Quality	AQMA runs along the southern border of the site		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Greengate and Newham Medical Centres within 800m, Newham University Hospital within 1200m. Primary School within 400m, Secondary School within 800m.	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods. There is the opportunity to provide a modern community facility for the benefit of the neighbourhood and to improve the local housing mix in a location that is well connected via the public transport network and is within a five minute walk of Greengate local centre and within a ten minute walk of Green Street District Centre. In order to ensure a successful neighbourhood is created; noise mitigation should be enhanced and walkability designed in to the site.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Greengate Local Centre within 400m		
	PTAL	4 (good)		
	Under-used / derelict land	Current configuration does not make best use of the site		
	Noise	Low to high levels of noise exposure, highest along the southern boundary of the site		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4 (good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.	- None
	Neighbouring Uses	Residential, commercial.		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4 (good)	Allocation of this site would have a positive impact on economic sustainability. Allocation will present opportunities to improve personal and economic resilience and support growth through the provision of providing adequate community facilities and homes to	- Activation of INF8/10 will ensure the re-provision of a community facility use
	Allocation likely to disrupt existing active	Yes – existing community facility but supported through re-provision		

	business?/or support it?		meet the needs of a growing population and facilitate a vibrant and strong community within Newham.	based on identified local need
	Allocation likely to provide net additional space for business use?	Unlikely, some community space could be re-provided	Moreover, partial residential development of the site would bring additional population to the area which would support local businesses, including through expenditure and adding to the pool of local labour.	- Activation of the successful place policies will seek to help create a high quality environment to retain and attract employment.
	Access to freight network (road / rail / water)	Constrained by road network		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Potentially loss of existing community centre depending on which option is chosen	The site has good access to a range of facilities due to the sites location within a five minute walk of Greengate Local Centre. Scope within scale of site to address any deficiencies arising as per INF8. Plaistow Park (Local) is located within a five minute walk and the greenway is located within a ten minute walk.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8).
	Sufficiency data? / Existing Provision	<p>Greenspace: Local and Pocket Park within 400m, SINC and MOL within 800m.</p> <p>Medical: Greengate and Newham Medical Centres within 800m, Newham University Hospital within 1200m.</p> <p>Education: Primary School within 400m, Secondary School within 800m.</p> <p>Childcare: Plaistow South provides below the borough average in relation to childcare places for both under 5s and those in the 5-14 years age range. Custom House which is adjacent to</p>		

		Caning Town North has above the borough average provision in relation to childcare.		
	Scope for visibility/other improvements to existing facilities	Potentially scope to improve the community centre if re-provided on site		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated. Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility. New build likely to be more energy efficient than existing buildings, as specified within the policy framework.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL/local access to facilities	4 (good)		
	Freight access by water or rail (e.g. for construction)	Not relevant		
	Scope for re-use of buildings / materials	Some		
	Proximity to heat network	Beyond 1200m		
8. To improve air and water quality	Close to water bodies / SPZs	No	<p>Allocation unlikely to introduce harmful uses, given good access to transport and facilities, allocation would not be expected to significantly increase the number of journey by private motor vehicle (with associated implications for air quality) over the existing use.</p> <p>Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.</p>	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Adjacent - Barking Road		
	PTAL	4 (good)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Yes – mature trees along Barking Road		
	Disruption of vehicle-heavy, polluting or contaminative use	No		
9. To increase the proportion of	PTAL	4 (good)	There is a risk housing as well as community facility uses may increase trip generation by car given, in which small scale changes would be	<ul style="list-style-type: none"> - Activation of sustainable transport

journeys made by sustainable modes of transport			incorporated through activation of sustainable transport policies would seek to mitigate this (including the cumulative impact on congestion). Opportunities would be sought to improve access to public transport/key movement corridors. Allocation however will better align housing near community facilities thus reducing the need to use private car to access a range of community facilities.	<p>policies (INF1, INF2, SP1, SP2, SP3, SP7 and SP8, SP10) will:</p> <ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability - Key corridor improvements
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No – some business waste	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable, area already served by LBN waste collection.		
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	98%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 800m	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	Bushes along boundary with Barking Road.		
	Natura 2000	No		
13. To enhance	Nearest CA	East Ham CA beyond 1200m	Development of the site does not raise character or heritage issues.	<ul style="list-style-type: none"> - None

character, protecting, conserving and enhancing heritage and other character assets	Nearest Listed Building (grade)	Essex Lodge (Grade II) within 400m		
	Nearest ATV	ATV6 Rancliffe Road within 1200m		
	Incongruous / poor quality buildings on site	No		
	APA	No		
	Proximity to ACV	N/A		
	Potential to enhance other character assets (parks, stations etc.)	No		

Newham Leisure Centre (CF28)

Area	7.1ha	Current use	Newham Leisure Centre		Approximate Postcode	E13 8SD
Existing allocations	No		Extant permissions	None		
Existing designations	Green Space, AQMA, Flood Zone 2, HFT hotspot					
Proposed allocation	<ul style="list-style-type: none"> Leisure Centre (non-strategic) with other enabling uses 		Alternative options not taken forward (see Social Infrastructure OA)	<ul style="list-style-type: none"> No allocation Leisure Centre and Residential (non-strategic) 		

Summary Assessment (further details in the table below)

Given the identification of the leisure centre as being near to the end of its life, the site presents an opportunity for redevelopment to secure numerous benefits. Overall, compared to the status quo, a leisure centre or leisure centre-with-housing allocation could support place-making/sustainable communities objectives, including local environmental improvements, through helping to provide an improved, viable, thus sustainable community leisure use, making better use of the site and securing improved integration with its surroundings as well as wider investment benefits. Both options provide similar opportunities, however introducing a residential component to enable the leisure facility, would ensure that viability considerations do not limit site enhancement opportunities, whilst supporting Local Plan housing objectives. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given it's out of centre location, no other options are appropriate.

Site allocation must address:

- Contamination, flood risk, and air quality issues (via appropriate investigation).
- High quality design that incorporates the appropriate mix and densities, optimising the site's potential, whilst being sensitive and connecting to local context.
- Protection and enhancement of SINCs, protection or re-provision of mature trees on site where possible, biodiversity.
- The securing of sustainable transport access and site connectivity and permeability.
- Community facility floorspace delivery; in accordance with identified local need, including any requirements for sports pitch provision.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Ensuring community facility provision continuation in this location will continue to promote equality of opportunity via access to services and facilities.</p> <p>Housing as part of an appropriate mix and choice of uses would also be supported by the close proximity to local schools and any social infrastructure (including any community facilities provided on site). The site's access to the employment hub and employment land provides local access to employment opportunities and walkability/ connectivity improvements to connect with opportunities will be important to address the low PTAL. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, INF8, INF10 and SP8).</p>	<ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	2 – 3 (poor to moderate)		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 400m Town Centre Within 1200m		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Newham University Hospital, Gateway Surgical Centre and Newham Centre for Mental Health within 400m.	<p>Overall the site provides a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as improvement and intensification of community facilities are particular opportunities.</p>	<ul style="list-style-type: none"> - Protect or replace the greenspace on the site in order to mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC intersecting with the site, MOL, Local and Pocket Park within 400m.		
	Distance to nearest local or town centre	Local Centre within 800m.		
	Sports facilities; opportunities for active travel	Newham Leisure Centre on site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	South-western part of the site located in a hot food takeaway hotspot		

		(2). Limited access to fresh, healthy food outlets in the vicinity of the site but Canning Town is easily accessible via public transport.		
	Noise levels	Low to high, highest along the western and southern boundaries of the site		
	Air Quality	AQMA along the western boundary of the site		
	Likelihood of land contamination	Normal		
3. To create successful neighbourhoods	Proximity to community facilities	Primary within 400m Secondary within 800m Adjacent Newham Hospital	This site provides a good opportunity to create a successful neighbourhood provided noise mitigation is maintained or enhanced and walkability is designed in. The site provides the opportunity to improve local housing mix and enhance the community facility offer in this location. The site is well served by the surrounding road network and numerous bus routes are accessible on Prince Regent Lane which provide access to a range of facilities and further transport connections throughout the borough.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Local Centre within 800m.		
	PTAL	2 – 3 (poor to moderate)		
	Under-used / derelict land	No		
	Noise	Low to high, highest along the western and southern boundaries of the site		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2 – 3 (poor to moderate)	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts from the adjacent main road can be mitigated.	<ul style="list-style-type: none"> - Buffering of road. - Walkability/local connection improvements
	Neighbouring uses	Greenspace (including SINC), major road, school, residential, hospital, local shopping parade (commercial		

		retail)	Opportunities exist to increase walkability both within the site and to the surrounding residential area (better connecting it to walking/cycling routes and public transport).	
	Walkability	Poor/ fair		
5. To foster sustainable economic growth	PTAL	2 – 3 (poor to moderate)	Allocation would support the updating and redevelopment of leisure uses which may result supporting access to employment opportunities and the economic growth of the area.	- Activation of local jobs and convergence policies.
	Allocation likely to disrupt existing active business	Yes – Existing leisure centre	Residential development would bring additional population to the area which would support local businesses (within the site’s catchment), including through expenditure and adding to the pool of local labour.	
	Allocation likely to provide net additional space for business use	Yes- Intensification of uses on site		
	Access to freight network (road / rail / water)	The site has good access via Newham Way/Prince Regent Lane which is a London red route supporting London strategic road network. Access to wharves/water is reasonable via the main road network		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Potentially some open space lost to provide enabling residential if that option is chosen	Reasonable level of access to a range of facilities and scope within scale of site to address any deficiencies arising as per INF6/8.	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/8).
	Sufficiency data? / Existing Provision	Greenspace: SINC intersecting with the site, MOL, Local and Pocket Park within 400m. Medical: Newham University Hospital, Gateway Surgical Centre and Newham Centre for Mental Health within 400m.	In the future, there will be additional demand for sports pitches in the borough, especially informal pitch provision; there is a deficit of artificial (3G/astro turf) pitches already, but a large proportion of this could be met by improved community access to provision in schools.	

		<p>Education: Primary and Secondary School adjacent to the site.</p> <p>Childcare: Plaistow South provides below the borough average in relation to both under 5s and those in the 5-14 year age range. However, Canning Town South which is adjacent to Plaistow South provides above the borough average in relation to both age groups.</p>		
	Scope for visibility / other improvements to existing facilities?	Yes, Newham Leisure Centre		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes – potential to intensify through redevelopment	No site-specific issues, allocation provides scope for implementation of relevant policies.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use - Energy efficient build - Enhance access to sustainable modes
	PTAL / local access to facilities	2-3 (poor to moderate) across site; limited town centre access		
	Freight access by water or rail (e.g. for construction)	Reasonable access to local wharves via road network, but area falls within a Traffic Congestion Zone		
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	>500m exiting, >1km potential		
8. To improve air	Proximity to water bodies / SPZs	No	The site includes extensive soft landscaping (pitches)	- Implementation of air

and water quality	AQMA	No, though whole borough likely to be designated	and a significant number of mature trees. Given the relevance of mature trees to air quality mitigation this should be protected / re-provided as per the scoped policy framework. No likely impacts on waterbodies, incorporation of SUDS features may improve quality of surface water run-off. Allocation should seek to improve access to sustainable modes in order to mitigate any possible increase in journeys by car.	quality / GI policies as scoped - SUDS to address runoff issues - Enhance access to sustainable modes of transport
	PTAL	2 – 3 (poor to moderate)		
	Likelihood of land contamination	Normal		
	Impact on trees / GS	Potential		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2 – 3 (poor to moderate)	<p>The site has a poor accessibility rating in which there is a degree of risk that redevelopment may increase the proportion of journey to the site by private vehicles. The site is facilitated by ancillary car parking and pedestrian access is constrained/limited given the sites proximity to Newham Way, in which improvements to improve public transport and cycling/walking would be sought at this location.</p> <p>However, it would be expected this can be mitigated through activation of sustainable transport policies as scoped (notably SP6, SP2, SP8, INF2) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).</p>	- Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	No	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good access to road network; , area already served by LBN waste collection		

11. To minimise and reduce flood risk	Flood zone	FZ2	Avoiding an increase in surface water run-off is important given the proximity to a CDA, but the extent of soft landscaping already across the site may make improvement difficult to impossible. SUDS to be incorporated, meeting policy requirements regarding run-off rates unless it can be demonstrated why this is impossible. Given policy framework as scoped, re-development will not worsen flood risk to any location.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience, possible off-setting contributions if improvement targets cannot be met within site - Flood risk assessment and mitigation
	CDA	Adjacent		
	TE2100 strip	No		
	Proportion of impermeable surface	Substantial, between a ¼ and 1/3 of the site is built on/ hardstanding carpark.		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m, Beckton District Park North	Mature trees on site have significant green infrastructure value but are protected by the policy framework as scoped. While the site includes significant amounts of designated green space, allocation will allow for development whilst still providing a reconfigured green space offer. The policy framework as scoped provides the parameters for these discussions. Allocation and ensuing development provides opportunity for the implementation of biodiversity and habitat enhancement requirements, including installation of more valuable habitat features and improvements to green grid links.	<ul style="list-style-type: none"> - Protection of mature trees and linear connectivity / green grid links allowing for reconfiguration of green space - Implementation of general biodiversity & habitat requirements
	Aerial review of site greening	Significant amount of designated green space. Also significant tree cover along the north and eastern boundaries of the site as well as in the carpark area.		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	East Ham CA within 1200m	Development of site does not raise heritage or character issues.	- None
	Nearest Listed Building (grade)	Memorial Baptist Church, Plaistow Grade II within 1200m		
	Nearest ATV	ATV8 Winsor Terrace within 800m		
	Incongruous / poor quality buildings on site	No		
	APA	No		
	Proximity to ACV	N/a		
	Potential to enhance other character assets	No		

	(parks, stations etc.)			
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Nursery Lane (LMUA03)

Area	0.74ha	Current use	Small collection of workshops, D uses, various retail units along Romford Road		Approximate Postcode	E7 9HZ / 9HD
Existing allocations	None		Extant permissions	None		
Existing designations	Partial LIL9, Partial CFOA, Access to Nature Deficiency, Small/Pocket Park Deficiency, Local Parks Deficiency, Traffic Congestion Zone, HFT/BS/Hostel Concentration Area					
Proposed allocation	Extension of LMUA (non-strategic)		Alternative options not taken forward (see Jobs OA)	Retain existing LMUA allocation boundary		

Summary Assessment (further details in the table below)

Overall, an extension of the existing allocation could further support employment, housing and place-making/sustainable communities objectives and bring forward local environmental improvements, albeit with some potential short term transitional effects, though these may be mitigated by wider local economic development/employability work. Not allocating the site would be less beneficial in respect of these wider objectives, but may present fewer short term transitional effects. Mitigation opportunities via new development and change of use applications and associated investment through the application of other policies, proposed and adopted, will be important mechanisms to secure improvements to the status quo and wider environmental performance, inclusive of complementing the site's existing employment-led context. In general extending the allocation will allow for consideration of a broader more coherent site, in a fairly accessible location, close to a town centre.

Site allocation must address:

- High quality design that incorporates the appropriate mix, layouts, and densities, taking into account the accessible location and optimises the site's potential, whilst being sensitive to the site's context.
- Potential contamination, noise and air quality issues (via appropriate investigation).
- The securing of sustainable transport access and site connectivity and permeability.
- Appropriate quantum/format/type of employment-generating uses, and managed transition and neighbourliness.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Extension of the existing LMUA allocation may involve re-development that could entail the loss of a small amount of employment generating uses, but this would be covered by managed transition policy (J2) to mitigate the effects. As the site could benefit from reconfiguration and intensification and variation of uses, an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J2, and SP8), helping to increase equality of opportunity in a particularly deprived area.</p> <p>Housing as part of an appropriate mix and choice of uses, would be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's proximity to employment land and the town centre provides good access to local employment opportunities, and good transport links ensure access to opportunities further afield. That said, walkability within the site to connect with opportunities will be important to address the areas of lower PTAL.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and community facility and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	3-4 (moderate to good) across the site		
	Proximity to employment land	SIL beyond 1200m LIL adjacent LMUA adjacent Employment Hub within 1200m Town Centre adjacent		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Lord Lister Health Centre and a number of pharmacies are located in Forest Gate District Centre in which half the site is situated.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and rail/bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC, Pocket Park, Local Park and District Park within 800m		
	Distance to nearest Town centre or local centre	The eastern half of the site is located within the boundary of Forest Gate District Centre		
	Sports facilities; opportunities for active	Gym located adjacent to the western perimeter of		

	travel	the site. Atherton Leisure Centre located within 800m. Local cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Located within a hot food takeaway hotspot (4). Various outlets within Forest Gate Town Centre		
	Noise levels	Low to high, highest along the eastern and northern boundaries of the site		
	Air Quality	The northern most part of the site is located within an AQMA		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Lord Lister Health Centre and a number of pharmacies , Primary and Secondary School and the Gate Library within 400m	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, provided noise mitigation is maintained or enhanced and walkability is designed in. There is an opportunity to reconfigure the site to use the land in a well-connected location in the most efficient manner possible. Part of the site is located within Forest Gate District Centre in which a range of facilities can be accessed which would support the intensification of this site. In addition the site is located along a Key Movement Corridor and Linear Gateway (Romford Road) and within a five minute walk of Forest Gate rail station. Forest Gate will become a Crossrail station which will provide an increase in both the number of destinations that are reachable from Forest Gate and the speed in which they can be reached which will aid in the creation of successful neighbourhoods.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Part of the site located in Forest Gate town centre		
	PTAL	3-4 (moderate to good)		
	Under-used / derelict land	The current configuration of the site does not make the most efficient use of the land		
	Noise	Low to high, highest along the eastern and northern boundaries of the site		
4. To ensure people	PTAL	3-4 (moderate to good)	This allocation extension continues to support this site's	- Activation of neighbourliness

have access to a choice of good quality housing that meets their needs		across the site	ability to yield a choice of new quality housing within the mix, and expected any negative impacts from the adjacent LIL can be mitigated through policy requirements.	policy
	Neighbouring Uses	LIL, town centre uses, residential.		
	Walkability	Very Good		
5. To foster sustainable economic growth	PTAL	3-4 (moderate to good)	<p>Expansion to the existing allocation should provide for a continuing and more diverse economic role, with uses compatible with residential tending to be in growth sectors. However, its location means that it is unlikely to encourage freight movement by means other than road network.</p> <p>Extension to the existing allocation will seek to present further opportunities for a mix of employment and residential uses to support economic growth through the provision of both jobs and homes. Although allocation would reconfigure LIL9 (Nursery Lane), in doing so the extension will better recognise clusters of small scale employment uses to support the managed transition to employment led mixed use development compatible with residential and investment to support economic growth in the borough. As such allocation will support this objective through the managed transition of employment land and new support new growth sectors business to locate to new premises here.</p> <p>Expansion of the allocation would bring additional population and a diversification of uses to the area which would support local businesses, including expenditure to support the vitality/viability of the town centre and adding to the pool of local labour through redevelopment.</p>	<ul style="list-style-type: none"> - Activation of Managed Transition policy J4, J2 (market demand testing and relocation strategy) - Secure sustainable transport access and permeability - Existing design policies as scoped should seek to improve relationship between employment uses and residential uses - Compatibility with J1 spatial strategy
	Allocation likely to disrupt existing active business	No		
	Allocation likely to provide net additional space for business use	Yes		
	Access to freight network (road / rail / water)	Good access off the strategic/principal road network (Romford Rd). Reasonable access by rail and wharves via the road network.		
6. To ensure inclusive access to a range of high-quality	Loss of community facility or open space	None	Good access to a range of facilities and scope within scale of site and edge of centre location to address any deficiencies arising as per INF6/8 or through excellent	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs
	Sufficiency data? / Existing Provision	Greenspace: SINC, Pocket Park, Local Park and		

community facilities and open space		<p>District Park within 800m</p> <p>Medical: Lord Lister Health Centre and a number of pharmacies are located in Forest Gate District Centre in which half the site is situated.</p> <p>Education: Primary and Secondary School within 400m.</p> <p>Community: Gate Library within 400m</p> <p>Childcare: Forest Gate South has 1 under 5s childcare place per 8 resident children. This is below the Newham average. Forest Gate South has 1 over 5s childcare place per 85 resident children which is below the Newham average. However, Forest Gate South is adjacent to Stratford & New Town and Forest Gate North which both have above average provision and are within reach of Forest Gate South.</p>	public transport access (to larger parks e.g. Wanstead flats). West Ham Park is located less than a ten minute walk from the site.	<p>(activation of INF8/6).</p> <ul style="list-style-type: none"> - Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. neighbouring mosque)
	Scope for visibility/other improvements to existing facilities?	None		
7. To promote	Re-use / intensification of previously developed /	Yes	Policies promoting re-use and recycling should be activated.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use

resource-efficient development, design and construction	underused land		Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility.	/ energy efficient build - Maintain / enhance access to sustainable mode of transport - Employment-generating uses reliant on freight to be balanced with road/junction capacity.
	PTAL/ local access to facilities	3-4 (moderate to good); good town centre access		
	Freight access by water or rail (e.g. for construction)	Constrained by road network	New build likely to be more energy efficient than existing buildings, as specified within the policy framework.	
	Scope for re-use of buildings / materials	Yes	Freight access for employment-generating uses would be road based with associated capacity issues and would be difficult to connect with local wharves; this will affect the sustainability of an employment-only allocation.	
	Proximity to heat network	>1km exiting, >500m potential		
8. To improve air and water quality	Close to water bodies / SPZs	No/SPZ 2	Allocation would not introduce harmful uses.	- Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Yes along northern perimeter of the site, although whole borough likely to be designated	In view of good access to transport and facilities, allocation would not be expected to significantly increase the number of journeys by private motor vehicle (with associated implications for air quality) over the existing.	
	PTAL	3-4 (moderate to good)	Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.	
	Likelihood of land contamination	High		
	Impact on trees / GS	None		
	Disruption of vehicle-heavy, polluting or contaminative use?	Yes		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	3-4 (moderate to good)	The area is well-located in terms of encouraging uptake of sustainable transport modes, and application of design policies through developments should support this. Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes (in particular via the town centre) through activation of sustainable transport policies as scoped (notably in INF2, SP2, SP8, SP10) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1).	- Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability (INF1, INF2, SP2, SP8, SP10)

10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Unknown	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / Proximity to waste facilities	Moderate, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	Given policy framework as scoped, re-development would not worsen flood risk to this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	- SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	100%		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 800m, West Ham Park	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	- Implementation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Eastern Part of the site located in Woodgrange Estate CA	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. The LMUA as extended contains a variety of heritage and character assets which if developed sympathetically will enhance the setting of the conservation area and listed buildings in vicinity (as per SP5).	- Protection and enhancement of heritage and character assets as per policy H5described.
	Nearest Listed Building (grade)	Emmanuel Church, Romford Road (Grade II) within 400m The former Forest Gate Odeon now a mosque is locally listed and lies within the LMUA		
	Nearest ATV	Forest Gate ATV4 within 400m		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 2		
	Proximity to ACV	N/A		
	Potential to enhance	Potential to enhance the		

	other character assets (parks, stations etc.)	existing conservation area		
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Atherton Mews (LMUA8)

Area	0.3ha	Current use	Mix of housing/ employment uses and some vacant sites	Approximate Postcode	E7 9JL
Existing allocations	None		Extant permissions	None	
Existing designations	Local Parks Deficiency, Access to Nature Deficiency, Hostel Concentration Area, Partial Area of Townscape Value				
Proposed allocation	Non-strategic LMUA (combine with Sprowston Mews)		Alternative options not taken forward (see Jobs OA)	No allocation	

Summary Assessment (further details in the table below)

Overall, an allocation, extending the Sprowston Mews LMUA could support employment, housing and place-making/sustainable communities objectives and bring forward local environmental improvements, albeit with some potential short term transitional effects, though these may be mitigated by wider local economic development/employability work. Not allocating the site would be less beneficial in respect of these wider objectives, but may present fewer short term transitional effects. Mitigation opportunities via new development and change of use applications and associated investment through the application of other policies, proposed and adopted, will be important mechanisms to secure improvements to the status quo and wider environmental performance, inclusive of complementing the site's residential context. In general allocation will allow for better use of an otherwise underused site, in a fairly accessible location, close to a town centre.

Site allocation must address:

- High quality design that incorporates the appropriate mix, layouts, and densities, taking into account the accessible location and optimises the site's potential, whilst being sensitive to the site's context.
- Contamination, noise and air quality issues (via appropriate investigation), buffering of adjacent tube/DLR lines and depot.
- The securing of sustainable transport access and site connectivity and permeability.
- Appropriate quantum/format/type of employment-generating uses.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Whilst re-development that could entail the loss of a small amount of employment generating uses, this would be covered by managed transition policy (J4) to mitigate the effects. As the site could benefit from reconfiguration and intensification and variation of uses, an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J4, and SP8), helping to increase equality of opportunity in a particularly deprived area.</p> <p>Housing as part of an appropriate mix and choice of uses, would be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's proximity to employment land and the town centre provides good access to local employment opportunities, and good transport links ensure access to opportunities further afield. That said, walkability within the site to connect with opportunities will be important to address the areas of lower PTAL.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	3-4 (moderate – good) across the site		
	Proximity to employment land	SIL beyond 1200m LIL within 400m LMUA within 400m Employment Hub within 1200m Town Centre within 400m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	Lord Lister Health Centre and a number of pharmacies are located in Forest Gate District Centre which is within 400m of the site.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC and Pocket Park within 400m. Local Park within 1200m and MOL beyond 1200m.		
	Distance to nearest Town centre or local centre	Town Centre within 400m.		
	Sports Facilities; opportunities for active travel	Atherton Leisure Centre within 400m. Local cycling network adjacent		

		to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	The eastern end of the site is located within a hot food takeaway hotspot (2). There are numerous outlets for fresh, healthy food in Forest Gate District Centre which is within 400m.		
	Noise levels	Low to high, highest to the south of the site		
	Air Quality	AQMA just beyond the southern boundary of the site		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Lord Lister Health Centre and a number of pharmacies, Primary and Secondary School within 400m.	Overall the site provides a good opportunity to contribute to the creation of successful neighbourhoods, provided noise mitigation is maintained or enhanced and walkability is designed in. There is an opportunity to reconfigure the site to use the land in a well-connected location in the most efficient manner possible. The site is located within 400m of Forest Gate District Centre in which a range of facilities can be accessed which would support the intensification of this site. This would allow for the improvement of the local housing mix and choice and the generation of employment. In addition the site is located within a five minute walk of Forest Gate rail station. Forest Gate will become a Crossrail station which will provide an increase in both the number of destinations that are reachable from Forest Gate and the speed in which they can be reached which will aid in the creation of successful neighbourhoods.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Forest Gate town centre within 400m		
	PTAL	3-4 (moderate – good)		
	Under-used / derelict land	Current configuration does not make best use of the site		
	Noise	Low to high, highest to the south of the site		
4. To ensure people have access to a	PTAL	3-4 (moderate – good) across the site	The site's context and scale would support an allocation that allows for the provision of a choice of new quality	<ul style="list-style-type: none"> - Walkability/local connectivity improvements
	Neighbouring Uses	Residential, hotel, place		

choice of good quality housing that meets their needs		of worship, some commercial.	housing within the mix.	
	Walkability	Fair-good	Whilst walkability is good to the site, opportunities exist to further improve walkability within the site and the connection to walking/cycling routes (helping to mitigate against the poor PTAL rating).	
5. To foster sustainable economic growth	PTAL	3-4 (moderate – good)	The allocation should not displace businesses but should instead, encourage them to locate here by securing employment space and promoting investment to ensure jobs and homes are aligned to meet growth needs and contribute to the diversification of the local economy.	<ul style="list-style-type: none"> - Activation of Managed Transition policy J J2 (market demand testing and relocation strategy) - Existing design policies as scoped should seek to improve relationship between employment uses and residential uses.
	Allocation likely to disrupt existing active business	No	Allocation would provide an opportunity for a managed transition to recognise the value of employment areas supporting their compatibility with residential uses to support growth in Newham. As such allocation would support this objective and improve people’s personal and economic resilience within Newham.	
	Allocation likely to provide net additional space for business use	Yes		
	Access to freight network (road / rail / water)	Road access reasonable. Rail access is reasonable (10min walk to Forest Gate Station). Water access is accessed via the major road network.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	Good access to a range of facilities and scope within scale of site and given proximity to town centre location to address any deficiencies arising as per INF6/8 or through excellent public transport access (to larger parks e.g. Wanstead flats). West Ham Park is located less than a ten minute walk from the site.	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities/new provision to meet needs (activation of INF8/6). - Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. neighbouring mosque which is a Grade II listed building)
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC and Pocket Park within 400m. Local Park within 1200m and MOL beyond 1200m.</p> <p>Medical: Lord Lister Health Centre and a number of pharmacies are located in Forest Gate District Centre which is within 400m of the site. Education: Primary and Secondary School within 400m.</p> <p>Childcare: Forest Gate</p>		

		South has 1 under 5s childcare place per 8 resident children. This is below the Newham average. Forest Gate South has 1 over 5s childcare place per 85 resident children which is below the Newham average. However, Forest Gate South is adjacent to Stratford & New Town and Forest Gate North which both have above average provision and are within reach of Forest Gate South.		
	Scope for visibility/other improvements to existing facilities	None		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated. Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility. New build likely to be more energy efficient than existing buildings, as specified within the policy framework. Freight access for employment-generating uses would be road based with associated capacity issues even if this can connect with local wharves; this will affect the sustainability of an employment-only allocation.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport - Employment-generating uses reliant on freight to be balanced with road/junction capacity.
	PTAL	3-4 (moderate – good)		
	Access to rail / water-freight (e.g. for construction)	Low access to local wharves via road network, subject to capacity		
	Scope for re-use of materials from existing development	Limited		
	Proximity to heat network	Beyond 1200m		
8. To improve air and water quality	Proximity to water bodies / SPZs	SPZ within 400m	Allocation does not introduce harmful uses, and will assist relocation of current polluting uses – car repairs. Given good access to transport and facilities, allocation would	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality
	AQMA	Yes – Romford Road adjacent		

	PTAL	3-4 (moderate – good)	<p>not be expected to significantly increase the number of journeys by private motor vehicle (with associated implications for air quality) over the existing.</p> <p>Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water run-off.</p>	<ul style="list-style-type: none"> - Enhance access to sustainable modes of transport
	Likelihood of land contamination	Limited		
	Impact on trees / GS	Yes – garden spaces		
	Disruption of vehicle-heavy, polluting or contaminative use?	No		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	3-4 (moderate – good)	<p>Sustainable travel policies as scoped could help mitigate the likelihood of car-based travel by enhancing the attractiveness of sustainable modes and improving local connectivity.</p> <p>Small scale changes including improved pedestrian/walking routes through the site would be incorporated/designed in through activation of sustainable transport policies.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable travel connectivity, - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators?	No – mostly residential waste, some business waste.	<p>Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.</p>	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network/ Proximity to waste facilities	Reasonable, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	No	<p>Given policy framework as scoped, re-development would not worsen flood risk at this location outside a flood zone, and has the potential to improve local drainage through incorporation of SUDS.</p>	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	60%		

12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	Within 400m	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies. Introduction of residential uses with gardens and private amenity spaces will be important in this regard.	- Implementation of biodiversity / GI policies
	Aerial review of site greening	Some mature trees in gardens		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Woodgrange Conservation Area within 400m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Location of site within area of townscape value emphasises importance of high quality design and regeneration at this location.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Ahzar Academy (United Reform Church and Hall at rear) fronting Norwich Road (Grade II)		
	Nearest ATV	Forest Gate ATV4 incorporates the northern part of the site		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 2		
	Proximity to ACV	N/A		
	Potential to enhance other character assets (parks, stations etc.)	No		

Bridge Road Depot (LMUA13)

Area	1.8 ha	Current use	LBN Depot (NEWCO manufacturing, LBN housing repairs and call centre / ICT Hub)	Approximate Postcode	E15 3LX
Existing allocations	Local Industrial Location (LIL11)		Extant permissions	No	
Existing designations	Parks deficiency, HFT concentration				
Proposed allocation	<ul style="list-style-type: none"> LMUA 		Alternative options not taken forward (see Jobs OA)	<ul style="list-style-type: none"> Non-strategic Residential Retain LIL 	

Summary Assessment (further details in the table below)

Currently occupied by a local authority depot, the site presents an opportunity for intensification and potential diversification of uses. Overall, an allocation could support employment, housing and place-making/sustainable community objectives and bring forward local environmental improvements. Allocation of the site for housing-only development would be less beneficial in respect of these wider objectives, but may be appropriate due to the predominantly residential character of the vicinity and alternative employment options close by: short term transitional effects may also be mitigated by wider local economic development/employability work. Retaining the site's existing LIL designation also would be less beneficial in respect of these wider objectives, but may present fewer short term transitional effects. Mitigation opportunities presented via investment and the application of other policies, proposed and adopted, will be important mechanisms to secure improvements to the status quo and wider environmental performance, inclusive of complementing the site's residential and heritage context. In general allocation options will allow for better use of an otherwise underused site, in a location close to a DLR station.

Site allocation must address:

- Contamination, flood risk, and air quality issues (via appropriate investigation), buffering of adjacent tube/DLR lines and depot.
- High quality design via masterplanning, incorporating appropriate mix of uses, layouts, access, densities, and building heights optimising the site's potential in light of local context.
- The securing of sustainable transport access and permeability, connecting to the nearby DLR (potentially via the proposed Abbey Road site allocation).
- Appropriate quantum/format/type of employment-generating uses, including managed transition.
- Appropriate housing mix considerations, inclusive of social infrastructure considerations where local need is demonstrated.
- The protection of the adjacent community garden, mature trees and Scheduled Ancient Monument; APA tier 1.
- Connection to district heating network.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	20% most deprived	<p>Whilst re-development could entail the loss of some employment generating uses, this would be covered by managed transition policy (J2) to mitigate the effects, in this case covered by known scope to consolidate the depot at Folkestone Road. As the site could benefit from intensification and variation of uses, an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, and SP8).</p> <p>Housing either as the sole use or as part of an appropriate mix and choice of uses, would be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's proximity to employment land and the town centre and employment hub provides good access to local employment opportunities, and DLR links provide access to opportunities further afield, however walkability across the site to connect with opportunities will be important to address the low PTAL in some areas.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	1b-6a (very poor to excellent)		
	Proximity to employment land	SIL within 1200m Within LIL LMUA within 400m Employment Hub within 400m Town Centre Within 400m		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Abbey Road Medical Practice within 400m.	<p>Overall the site provides a good opportunity to support healthier lifestyles provided walkability is designed in (connecting with the existing network and DLR/bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.</p>	<ul style="list-style-type: none"> - Protect adjacent greenspace in order to mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	Pocket Park adjacent, MOL and SINC within 400m, Local Park within 800m.		
	Distance to nearest Town centre or local centre	Stratford Metropolitan Centre within 800m		
	Sports facilities; opportunities for active travel	Limited opportunities for sports other than in the town centre and local park; local cycling network adjacent to the		

		site and local walking network within 400m of the site.		
	Hot food Takeaway Hotspot/access to fresh healthy food	Located in a hot food takeaway hotspot (2). Located within 800m of Stratford Metropolitan Centre from which various fresh, healthy foods are accessible from		
	Noise levels	Low levels of noise exposure, though train lines may cause some issues at quieter times of day		
	Air Quality	Not in an AQMA		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	Well-connected site within walking distance of Stratford town centre and close to a DLR station and other facilities, including adjacent community garden. These advantages make it suitable for residential though employment uses could help buffer the railway tracks. Scale and consolidation of depot elsewhere (, allow for careful masterplanning to integrate with the existing neighbourhood, and create a new successful part of it.	- Quality design policies
	Proximity to identified centre	Within 800m of Stratford metropolitan centre		
	PTAL	1b-6a (very poor to excellent) but very close to DLR station		
	Under-used / derelict land	Yes – scope for intensification		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	1b-6a (very poor to excellent)	The site’s context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix. Whilst walkability is good to the site, and PTAL is excellent in some areas, opportunities exist to further improve walkability within the site and the connection to walking/cycling routes (to mitigate against the areas where	- Walkability/local connectivity improvements
	Neighbouring Uses	LIL, green space, residential.		
	Walkability	Fair – Good		

			PTAL ratings are poor).	
5. To foster sustainable economic growth	PTAL	1b-6a (very poor to excellent)	<p>The site currently forms part of employment land expected to support the economic growth set out in J1, J2, J3 .</p> <p>Allocation could support continued (potentially more space efficient, growth sector) employment uses on site, or would more generally seek to support local businesses through provision of new customers and local employees. If site were to lose its employment offer, this would be by way of a relocation process, maintaining the employment elsewhere.</p> <p>Moreover, residential development (alone or as part of a mix) would bring additional population to the area which would support local businesses, including through expenditure and adding to the pool of local labour.</p> <p>As such allocation would have a positive impact on economic sustainability.</p>	Activation of Managed transition criteria as per J4 and J2.
	Allocation likely to disrupt existing active business	Yes – Specialist depot operation uses forming part of Council operations (but consolidation would be planned with		
	Allocation likely to provide net additional space for business use	Yes – Scope to intensify employment uses on site		
	Access to freight network (road / rail / water)	Reasonable access as site is close to principal road network. Adequate access via road to wharves and wider rail network.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space?	None	<p>Reasonable access to a range of facilities, broadened via DLR and if connectivity and site permeability designed in. There is a pocket park, Abbey Gardens, adjacent to the site and Stratford Park is within a five minute walk of the site.</p>	- Ensure access across the site to existing facilities/new provision to meet needs (activation of INF6/8).
	Sufficiency data? Existing Provision	<p>Greenspace: Pocket Park adjacent, MOL and SINC within 400m, Local Park within 800m</p> <p>Medical: Abbey Road Medical Practice within 800m.</p> <p>Education: Primary school within 400m, Secondary school within 800m.</p> <p>Childcare: West Ham provides the borough</p>		

		average in relation to both under 5s and 5-14 year age range childcare. It is adjacent to Stratford and New Town and Canning Town North which both provide a level of provision that is above the borough average. Other facilities: available in the town and local centres nearby.		
	Scope for visibility/ other improvements to existing facilities?	None		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	The site has been identified as having good potential for redevelopment given under-use at present; as such allocation would encourage a more efficient use of land, commensurate with the site's good access to transport and facilities. Re-development in a different format likely to limit scope for reuse of buildings but policies promoting re-use and recycling of materials should be activated. New build likely to be more energy efficient as specified within the policy framework.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL / local access to facilities	1b-6a (very poor to excellent)		
	Freight access by water or rail (e.g. for construction)	Reasonable road access to local wharves		
	Scope for re-use of buildings / materials	Some		
	Proximity to heat network	Intersects potential DH line, is well within 1km buffer of existing network		
8. To improve air and water quality	Close to water bodies / SPZs	No / no	Allocation will encourage a move away from air quality impacting uses (industrial, with associated freight movements) and, given good transport and facilities access, would be unlikely to increase the number of journeys by private motor vehicle. Redevelopment also provides an opportunity for activation	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Maintain / enhance access to sustainable modes of transport
	AQMA	No, but whole borough likely to be designated		
	PTAL	1b-6a (very poor to excellent)		
	Likelihood of land contamination	High		

	Impact on trees / GS	Mature trees around half of site edge	of SUDS requirements, with associated benefits for surface water quality.	
	Disruption of vehicle-heavy, polluting or contaminative use	Potential		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	1b-6a (very poor to excellent)	<p>Whilst the PTAL is varied across the site, allocation can increase employment opportunities in the local area, which may reduce local residents need to travel further afield for work. The site benefits from good access to Abbey Road DLR which would improve access to the site from further afield. Design measures would be sought to promote walking and cycling at this location to reduce vehicular movements from surrounding areas.</p> <p>The site is dominated by large levels of car parking on site in which allocation would seek to intensify uses on site and better utilise sustainable modes of transport. As such allocation of this site for employment led mixed use would have a positive impact on the number of journeys made by sustainable modes.</p>	Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability.
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Moderately	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable / area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	2 / 3	Requires activation of appropriate flood risk assessment and mitigation via policy SC3 in terms of the design and orientation of particular uses.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	Adjacent		
	TE2100 strip	No	Given policy framework as scoped, re-development would not worsen flood risk to any location and has the potential to improve local drainage given the extent of hardstanding on site and opportunity to provide SUDs.	
	Proportion of impermeable surface	Whole site save for tree lined edges		

12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<400m	Given the relative lack of greening on site at present, redevelopment provides the opportunity to improve the offer through activation of relevant biodiversity requirements. Policy framework as scoped would protect mature trees or require re-provision.	- Implementation of biodiversity / GI policies (including protection of mature trees)
	Aerial review of site greening	Trees along half of site perimeter		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Stratford St John CA less than 400m	Development of the site will require standard archaeological investigation for APA Tier 1 as per Policy SP5/5a. Development of site should provide the opportunity enhance the setting of the community garden & Scheduled Ancient Monument at Bakers Row, and make better use of the DLR station.	Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Group of Grade II listed buildings at Abbey Lane including pumping station and terraced housing within 400m; adjacent Scheduled Ancient Monument (Langthorne Abbey)		
	Nearest ATV	All Saints Church ATV within 800m		
	Incongruous / poor quality buildings on site	Yes		
	APA	Tier 1		
	Proximity to ACV	N/a		
	Potential to enhance other character assets (parks, stations etc.)	Yes – community garden; DLR station		

Beeby Road (LMUA14)

Area	0.87ha	Current use	Mixed including D1, B1a, job centre, charity clothes drop-off, residential and industrial units	Approximate Postcode	E16 3PG
Existing allocations	LIL (south-western part of site)		Extant permissions	None	
Existing designations	AQMA, Access to nature deficiency, HFT concentration				
Proposed allocation	Non-strategic LMUA		Alternative options not taken forward (see Jobs OA)	No allocation (retain existing uses/part LIL)	

Summary Assessment (further details in the table below)

Overall, an allocation could support employment, housing and place-making/sustainable community objectives and bring forward local environmental improvements, albeit with some potential short term transitional effects, though these may be mitigated by wider local economic development/employability work. Not allocating the site or leaving the site part Lil would be less beneficial in respect of these wider objectives. Mitigation opportunities via new development and change of use applications and associated investment through the application of other policies, proposed and adopted, will be important mechanisms to secure improvements to the status quo and wider environmental performance, inclusive of complementing the site's residential context to the south.

Site allocation must address:

- High quality design that incorporates the appropriate mix, layouts, and densities, taking into account the accessible location and optimises the site's potential, whilst being sensitive to the site's context.
- Contamination, noise, flood risk and air quality issues (via appropriate investigation), buffering of adjacent main road.
- The securing of sustainable transport access and site connectivity and permeability.
- Appropriate quantum/format/type of employment-generating uses, managed transition on industrial part of the site.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty	LSOA IMD?	10% most deprived	Whilst re-development could entail the loss of a small	- Activation of managed
	PTAL	2-3 (poor-moderate)		

and promote equality of opportunity	Proximity to employment land	SIL beyond 1200m LIL adjacent LMUA proposed Employment Hub within 800m Town Centre Within 800m	<p>amount of employment generating uses, this would be covered by managed transition policy (J2) to mitigate the effects. As the site could benefit from reconfiguration and intensification and variation of uses, an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, and SP8), helping to increase equality of opportunity in a particularly deprived area.</p> <p>Housing as part of an appropriate mix and choice of uses, would be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's proximity to employment land and the town centre and employment hub provides good access to local employment opportunities, and however walkability across the site to connect with opportunities will be important to address the low PTAL.</p>	<p>transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site.</p> <ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and neighbourly development policies - Walkability / improvements to public transport access.
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Custom House Surgery within 800m	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyles, improving the quality of local housing provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green space	Local Park adjacent, SINC and Pocket Park within 400m, MOL within 1200m.		
	Distance to nearest Town centre or local centre	Town Centre within 800m		
	Sports facilities; opportunities for active travel	Newham Leisure Centre within 800m. Local cycling network adjacent to the site.		
	Hot Food Takeaway Hotspot/ access to fresh, healthy food	Located in a hot food takeaway hotspot (3). Limited offer of fresh, healthy food in the immediate vicinity of the site but numerous outlets for fresh, healthy food		

		located in Canning Town which is easily accessible via public transport.		
	Noise levels	Low to High, highest along the northern perimeter of the site		
	Air Quality	Northern part of the site is in a AQMA		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	Site adjoins A13 and takes direct access from Freemasons Road. Currently occupied by a range of residential, industrial and community uses. Introduction of further residential could help secure investment and improve the quality of the buildings, contributing to wider neighbourhood character. Although the site has a low PTAL rating it is in walking distance of the new Cross rail station at Custom House, and the associated proposed transport interchange. Configuration of new development should allow for buffering of the main road's noise impacts.	<ul style="list-style-type: none"> - Place-making through high quality design and layout, incorporating appropriate densities, mix of housing, and building heights; and mix of uses to meet local needs. - Issues of noise pollution to be addressed in design and layout.
	Proximity to identified centre	Canning Town town centre within 800m, local centre 600m, local shopping parade within 400m		
	PTAL	2-3 (poor-moderate)		
	Under-used / derelict land	Yes		
	Noise	Low to High, highest along the northern perimeter of the site		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2-3 (poor-moderate)	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix, providing any negative impacts from the adjacent main road can be mitigated. Opportunities exist to further improve walkability within the site, in particular addressing permeability from north to south and the connection to walking/cycling routes (to mitigate against the poor PTAL rating).	- Walkability/local connectivity improvements
	Neighbouring Uses	L1L, greenspace, main road, residential.		
	Walkability	Poor - fair		
5. To foster sustainable economic growth	PTAL	2-3 (poor-moderate)	The allocation may result in minor business displacement but this would be covered by managed transition policy. However, longer term, the development promoted should	- Activation of Managed Transition policy J4, J2 (market demand testing and
	Allocation likely to disrupt existing active	Yes – but minimal active use (mainly storage)		

	business		better support sustainable economic growth by securing modern, fit for purpose employment space aligned to meet growth needs and contribute to the diversification of the local economy. As such allocation would support this objective and improve people's personal and economic resilience within Newham.	relocation strategy) - Existing design policies as scoped should seek to improve relationship between employment uses and residential uses. - Compatibility with J1 spatial strategy
	Allocation likely to provide net additional space for business use	Yes - ongoing support for employment uses across the site		
	Access to freight network (road / rail / water)	Good access to the strategic road network (Newham Way) and reasonable access to Wharves and rail via the road network.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	Yes, YMCA George Williams College, Job Centre	Good level of access to a range of facilities, Freemasons Road Local Centre is located within a five minute walk of the site and Canning Town District Centre is less than a fifteen minute walk from the site. Canning Town Recreation Ground (Local Park) located adjacent to the site. YMCA would either need to be incorporated in the site or demonstrate no longer needed as per INF8, which protects facilities for which there is a need.	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. residential properties to the south) - Activation of INF8 if community facility (YMCA) were proposed to be lost.
	Sufficiency data? / Existing Provision	Custom House Surgery within 800. Nursery and Primary Schools within 400m, Secondary School within 800m. Custom House has 1 under 5s childcare place per 5 resident children. This is above the Newham average. Custom House has 1 over 5s childcare place per 17 resident children which is above the Newham average.		
	Scope for visibility improvements to existing facilities	Yes, YMCA George Williams College		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	While the PTAL of the location is relatively poor, the site is less than a 15 minute travel time to Canning Town centre and adjacent to a recreation ground, as such, facilities access is reasonable. The position alongside the Newham Way is also good for business and freight access. As the area is already operating as mixed use, allocation would not be expected to significantly alter journeys to the site or	- Re-use of materials and improved efficiency of land use / energy efficient build - Employment-generating uses reliant on freight to be balanced with road capacity.
	PTAL / local access to facilities	2-3 (poor-moderate)		
	Freight access by water or rail (e.g. for construction)	Good access to local wharves via road network (site is adjacent to		

		Newham Way)	resource use. Redevelopment and intensification provides the opportunity for re-use of buildings and materials where appropriate and delivery of more energy efficient buildings than the current position.	
	Scope for re-use of buildings / materials	Yes		
	Proximity to heat network	>1200m existing, <800 potential		
8. To improve air and water quality	Close to water bodies / SPZs	No / no	SUDS as specified within the existing policy framework would improve quality of surface water run-off.	<ul style="list-style-type: none"> - Protection of SINC / greening, specifically tree cover. - SUDS to address runoff issues - Enhance access to sustainable modes of transport
	AQMA	Yes		
	PTAL	2-3 (poor-moderate)	Allocation is unlikely to lead to an introduction of uses likely to worsen air quality; the LMUA designation in fact rules out heavy industry uses incompatible with housing and may have indirect long-term benefits for air quality.	
	Likelihood of land contamination	Some (industrial units)		
	Impact on trees / GS	None		
	Disruption of vehicle-heavy, polluting or contaminative use	Not known		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2-3 (poor-moderate)	Allocation of this site is likely to have a positive impact on this objective. A mix of uses presents an opportunity to promote sustainable modes of transport aligned with the delivery of providing employment opportunities close to housing. Development at this location may improve the likelihood for walking and cycling to and from the site through improved connectivity to the wider neighbourhood (including green space to the east) which will have a positive impact on the number of journeys made by sustainable modes.	<ul style="list-style-type: none"> - Reduce dominance of car-based access and improve sustainable travel connectivity, capacity and reliability (INF1, INF2, SP2, SP8, SP10)
			Overall allocation of this site would have a positive impact on the proportion of journeys made by sustainable modes through activation of sustainable transport policies as scoped (notably in INF2, SP2, SP8,) even if overall travel demand were increased (highlighting the importance of strategic transport investment as per INF1) particularly from Newham Way and walking and cycling via Freemasons Road.	

10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Not known	Given the existing mixed use nature of the site and mixed use allocation it is reasonable to assume that allocation would not significantly alter waste production from the site overall. In any case, whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Good (adjacent to Newham Way)		
11. To minimise and reduce flood risk	Flood zone	FZ2	Adequate flood risk assessment (with mitigation where needed) and a responsive approach to site layout and design is necessary given the FZ2 location.	- SUDS to improve local flood resilience - Flood risk assessment and mitigation
	CDA	No		
	TE2100 strip	No	As per the scoped policy framework, re-development would not worsen flood risk to any location. Through the inclusion of SUDS redevelopment has the potential to improve local drainage.	
	Proportion of impermeable surface	>95% of site (couple of tiny residential gardens at north)		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<100m to Ashburton Woodland	The site provides little to no biodiversity offer at present, redevelopment could offset biodiversity requirements via enhancements to local GI as there is a woodland and recreation ground adjacent to site.	- Implementation of biodiversity / GI policies, including through contributions to LOCAL sites if off-setting is preferred
	Aerial review of site greening	A couple of trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Stratford St John's CA within 1200m	Development of site does not raise heritage issues.	- Development should be oriented to take full advantage of adjoining Canning Town recreation ground and make best use of existing buildings.
	Nearest Listed Building (grade)	Canning Town Library Grade II within 800m St Margarets Church, Canning Town, locally listed building within 800m	Although not locally or statutorily listed the large YMCA building at the site is of architectural merit, and ideally would be re-used in the redevelopment of the site.	
	Nearest ATV	ATV7 Canning Town within 800m		
	Incongruous / poor quality buildings on site	Yes		
	APA	Adjacent Tier 1 APA		
	Proximity to ACV	N/a		

	Potential to enhance other character assets (parks, stations etc.)	Adjoins Canning Town recreation ground		
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Esk Road (LMUA15)

Area	0.28ha	Current use	Car-park (ancillary to adjacent police station), works site (comprising various vacant industrial sheds and structures and tyre storage).		Approximate Postcode	E13 8AL
Existing allocations	None		Extant permissions	None		
Existing designations	Licensing Saturation Zone, HFT/BS/Hostel concentrations					
Proposed allocation	Non-strategic LMUA		Alternative options not taken forward (see Jobs OA)	No allocation		

Summary Assessment (more details in the table below)

Overall, allocation could support employment and place-making / sustainable communities objectives, including local environmental improvements and a small contribution to housing needs, albeit with some short term transitional effects, though these may be mitigated by wider local economic development/employability work including managed transition policies. Opportunities presented through changes of use applications and associated investment through the application of other policies, proposed and adopted, will be important to make incremental improvements on the status quo to wider environmental performance and compatibility residential within the site and to the south, and sensitivity to the listed building opposite. Overall allocation or designation allows for good use of an otherwise under-used space benefiting from proximity to a large local centre and public transport corridor.

Site allocation must address

- Appropriately address noise, contamination and air quality issues
- High quality design taking account of wider site context, including improvement of Barking Road frontage and enhancement of settings of listed building opposite (Memorial Baptist Church)
- Employment-led development, securing compatibility with limited residential and managed transition where necessary.
- Appropriate housing mix and density, optimising site opportunities presented by the accessible location while being sensitive to wider context

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty	LSOA IMD?	20% most deprived	Whilst re-development could entail the loss of a very small	- Activation of managed

and promote equality of opportunity	PTAL	4 (good)	<p>amount of employment generating uses, this would be covered by managed transition policy (J2) to mitigate the effects. As the site could benefit from reconfiguration and intensification and variation of uses, an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, and SP8), helping to increase equality of opportunity in a particularly deprived area.</p> <p>Housing as part of an appropriate mix and choice of uses, would be supported by the proximity to local schools supporting local needs. The site's proximity to some employment land and the employment hub provides access to local employment opportunities, and transport links provide access to opportunities further afield.</p>	<p>transition policy/ bolstering access to other jobs in the vicinity.</p> <ul style="list-style-type: none"> - Activation of housing mix and choice, convergence and community facility and neighbourly development policies
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 800m Employment Hub within 800m Town Centre Within 1200m		
	Proximity to schools	Primary within 400m Secondary within 800m		
2. To support healthier lifestyles	Health facilities	Greengate Medical Centre within 400m and Newham University Hospital within 800m.	<p>Overall the site provides a good opportunity to support healthier lifestyles, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. Employment generation and opportunities to contribute to local housing quality and choice are also relevant considerations.</p>	<ul style="list-style-type: none"> - Incorporate greenspace on the site in order to mitigate pollution. - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC, MOL, Pocket and Local Park within 400m.		
	Distance from the nearest town or local centre	Local Centre within 400m.		
	Sports facilities; opportunities for active travel	Balaam Leisure Centre within 400m. Local cycling and walking network adjacent to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food	Located in a hot food takeaway hotspot (3). Reasonable access to fresh, healthy food in Greengate Local Centre, Canning Town easily accessible via public		

		transport.		
	Noise levels	Low over majority of the site but high adjoining Barking Road		
	Air Quality	AQMA along the northern boundary of the site		
	Land contamination - likelihood	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 800m	This site provides the opportunity to create a successful neighbourhood; provided noise mitigation is maintained and walkability is designed in. There is an opportunity to reconfigure the site to use the land in the most efficient manner possible. This would allow for the improvement of the local housing mix and choice and the generation of employment. The increase in population that would stem from this would support the employment uses on site and in the nearby local centre enhancing their viability. The site is well located within a five minute walk of Greengate local centre. In addition, the site fronts Barking Road, a Key Movement Corridor and Linear Gateway, from which a number of bus routes can be accessed connecting the sites with Canning Town, East Ham and Stratford. Allocation also offers the opportunity to improve the visual amenity of the area.	<ul style="list-style-type: none"> - Secure sustainable transport access and permeability - Activate Successful Places policies
	Proximity to identified centre	Canning Town metropolitan centre within 1200m		
	PTAL	4 (good)		
	Under-used / derelict land	No		
	Noise	Low over majority of the site but high adjoining Barking Road		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	4 (good)	The site's context would support an allocation that allows for the provision of a choice of new quality housing within the mix.	- None
	Neighbouring Uses	Police station, residential, police station, church, local centre		
	Walkability	Good		
5. To foster sustainable economic growth	PTAL	4 (good)	Allocation of this site seeks to promote development employment uses compatible with the surrounding residential uses at this location. Allocation would support economic growth to manage a number of vacant uses on	<ul style="list-style-type: none"> - J4 (re viable employment space). - Existing design policies as scoped should seek to
	Allocation likely to disrupt existing active business	No -		

	Allocation likely to provide net additional space for business use	Yes	<p>site and propose a mix of uses to support the provision of jobs and homes. As such it will have a positive impact on this objective in that it will improve people's access to jobs and homes, which in improves peoples economic and personal resilience. Existing policy requires that such space should be viable and hence delivery sustainable economic growth.</p> <p>Given the site's proximity to the Local Centre, allocation would also support local business through expenditure in this area. Any redevelopment would bring increased employment and population to this area and add to the pool of local labour.</p>	<p>improve relationship between employment uses and residential uses.</p> <ul style="list-style-type: none"> - Compatibility with J1 spatial strategy.
	Access to freight network (road / rail / water)	Road access good. Rail access poor. Water access none.		
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	None	<p>This location provides good levels of access to various community facilities and open space. The site is less than a five minute walk from Greengate Local Centre. Hermit Park and Canning Town Recreation Ground are located within a ten minute walk of the site. The site is well served by public transport which provides easy access to Canning Town District Centre, Green Street District Centre and East Ham Major Centre where further facilities are available. The scale of the site and its edge of centre location also allows for the incorporation of any facilities to meet a local deficit.</p>	<ul style="list-style-type: none"> - Ensure access across the site to existing facilities
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC, MOL, Pocket and Local Park within 400m.</p> <p>Education: Nursery School, Primary School within 400m, and Secondary School within 800m.</p> <p>Childcare: Canning Town South has above the Newham average provision for under 5s childcare and has above the Newham average provision for ages 5 - 14.</p>		
	Scope for visibility/ other improvements to existing facilities?	None		

7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	Policies promoting re-use and recycling should be activated.	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport - Employment-generating uses reliant on freight to be balanced with road/junction capacity.
	PTAL / local access to facilities	4 (good) / good (<100m to Abbey Arms Local Centre)	Allocation will allow for modernisation and intensification of use, constituting a more efficient use of the land commensurate with its good public transport and town centre accessibility.	
	Freight access by water or rail (e.g. for construction)	Moderate, reasonably accessible to major road network	New build likely to be more energy efficient than existing buildings, as specified within the policy framework.	
	Scope for re-use of buildings / materials	Limited	Freight access for employment-generating uses would be road based with associated capacity issues but would have some potential for connection with local wharves.	
	Proximity to heat network	> 1km to existing or proposed		
8. To improve air and water quality	Close to water bodies / SPZs	No / no	Allocation would not introduce harmful uses.	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	Yes	Good access to transport and facilities means that allocation would not be expected to significantly increase the number of journey by private motor vehicle (with associated implications for air quality) over existing uses at the site.	
	PTAL	4 (good)		
	Likelihood of land contamination	High	Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water runoff.	
	Impact on trees / GS	None		
	Disruption of vehicle-heavy, polluting or contaminative use	Yes (car parking and industrial uses)		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	4 (good)	The site benefits from good access to public transport and the allocation would also seek to promote walking and cycling with any development at this location. Allocation for a mix of uses would support the economic growth of Abbey Arms local centre though homes near to job opportunities and expenditure.	<ul style="list-style-type: none"> - Cumulative impact policy with respect to congestion - Existing sustainable transport policies.

			Located within a congestion zone and along a movement corridor opportunities would be sought to recognise the cumulative impacts to address congestion along this corridor alongside public realm improvements to promote walking and cycling.	
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Unclear	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	- Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Reasonable, area served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	FZ1	Given policy framework as scoped, re-development would not worsen flood risk at this location and has the potential to improve local drainage through incorporation of SUDS.	- SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	Whole of site		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<250m (Greenway)	Given the lack of greening on site at present, redevelopment provides the opportunity to improve the offer given activation of relevant biodiversity policies.	Implementation of biodiversity / GI policies
	Aerial review of site greening	None		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Sugar House Lane CA beyond 1200m	Development of the site will require standard archaeological investigation for APA Tier 2 as per Policy SP5/5a. Site is located on a quality movement corridor adjacent and opposite designated heritage assets. Redevelopment of site provides opportunity to improve the frontage to Barking Road and enhance settings of listed buildings.	- Protection and enhancement of heritage and character assets described.
	Nearest Listed Building (grade)	Memorial Baptist Church, Barking Road Grade II is opposite the site. Locally listed police station adjoins the site		
	Nearest ATV	ATV5 All Saints Church, Church St Nth within 1200m		
	Incongruous / poor	Yes		

	quality buildings on site			
	APA	Tier 2 APA		
	Proximity to ACV	N/A		
	Potential to enhance other character assets (parks, stations etc.)	Quality Movement Corridor/ Linear Gateway		

Kudhail Industrial Complex (LMUA16)

Area	0.38ha	Current use	Factory Premises, Clothing and Quilt manufacturing.		Approximate Postcode	E12 5PN
Existing allocations	None		Extant permissions	None		
Existing designations	Parks / access to nature deficiency, saturation policy zone, HFT/BS concentrations					
Proposed allocation	<ul style="list-style-type: none"> Non-strategic LMUA 		Alternative options not taken forward (see Jobs OA)	<ul style="list-style-type: none"> Non-strategic residential No allocation 		

Summary Assessment (further details in the table below)

Overall, compared to the status quo, given the site's location within a residential context, a mixed use allocation could support employment and housing and place-making/sustainable communities objectives, including local character improvements, whilst making better use of the site and securing better integration with its surroundings as well as wider investment benefits, albeit with some short term transitional effects, though these may be mitigated by wider local economic development/employability work. Potential positive effects on convergence, sustainable travel and wider environmental performance will be secured through the application of existing and proposed policies. Given its out of centre location, no other options are appropriate.

Site allocation must address:

- High quality design that incorporates the appropriate housing mix and densities and achieves positive impacts on the site's surroundings, optimising the site's potential whilst being sensitive to local context.
- Contamination and noise pollution (via appropriate investigation).
- The securing of sustainable transport access and site connectivity and permeability.
- Promotion of efficient use of resources through improved land use efficiency, re-use of materials, reduction in waste generation and increased recycling, and energy efficient build.

IIA Objective	Relevant Data		Commentary	Mitigation
1. To reduce poverty and promote equality of opportunity	LSOA IMD?	30% most deprived	<p>Whilst re-development could entail the loss of a small amount of employment generating uses, this would be covered by managed transition policy (J2) to mitigate the effects. As the site could benefit from intensification and variation of uses, an opportunity exists to improve employment densities and variety. Investment more generally in whatever form would also benefit the area through multiplier and ripple effects secured by policies (e.g. S1, J3, J2, and SP8).</p> <p>Housing as part of an appropriate mix and choice of uses, would be supported by the proximity to local schools and other social infrastructure within the town centre, supporting local needs. The site's proximity to some employment locations, provides access to local employment opportunities, however walkability across the site to connect with opportunities will be important to address the low PTAL.</p>	<ul style="list-style-type: none"> - Activation of managed transition policy/ bolstering access to other jobs in the vicinity/ new employment generation on site. - Activation of housing mix and choice, convergence and neighbourly development policies - Walkability / improvements to public transport access.
	PTAL	2 (poor)		
	Proximity to employment land	SIL beyond 1200m LIL within 800m LMUA within 400m Employment Hub beyond 1200m Town Centre beyond 1200m		
	Proximity to schools	Primary within 400m Secondary within 400m		
2. To support healthier lifestyles	Health facilities	GP and pharmacy within 400m.	<p>Overall the site provides a good opportunity to contribute to a healthier lifestyle, provided walkability is designed in (connecting with the existing network and bus access) further takeaways are not created, noise mitigation is maintained and any contamination is dealt with. A reduction in car-dependent development and opportunities to improve local housing mix and choice through the scale of the site, as well as employment generation are particular opportunities.</p>	<ul style="list-style-type: none"> - Activate cumulative impact policy - Secure sustainable transport access and permeability
	Green Space	SINC and Pocket Park within 400m. Local Park and MOL within 800m.		
	Distance to nearest Town centre or local centre	Manor Park Local Centre within 800m		
	Sports facilities; opportunities for active travel	The Gym Ilford within 800m. Local cycling network adjacent to the site and local walking network located in close proximity to the site.		
	Hot Food Takeaway Hotspot/access to fresh, healthy food?	Located in a hot food takeaway hotspot (3).		

	Noise levels	Low		
	Air Quality	Not located in an AQMA		
	Likelihood of land contamination	High		
3. To create successful neighbourhoods	Proximity to community facilities	Primary school within 400m Secondary school within 400m	This site provides the opportunity to create a successful neighbourhood; provided noise mitigation is maintained and walkability is designed in. There is an opportunity to reconfigure the site to use the land in the most efficient manner possible. This would allow for the improvement of the local housing mix and choice and the generation of employment. The site is reasonably well connected, Manor Park rail station is located within a fifteen minute walk of the site and numerous bus routes can be accessed on Romford Road, a Key Movement Corridor and Linear Gateway, which is less than a five minute walk away. In addition, allocation would provide the opportunity for the visual amenity of the area to be improved through the design process associated with new development.	<ul style="list-style-type: none"> - Activate Successful Places policies - Secure sustainable transport access and permeability
	Proximity to identified centre	Manor Park Local Centre within 800m		
	PTAL	2 (poor)		
	Under-used / derelict land	Yes		
	Noise	Low		
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	2 (poor)	The site's context and scale would support an allocation that allows for the provision of a choice of new quality housing within the mix. Whilst walkability is good to the site, opportunities exist to further improve walkability within the site and the connection to walking/cycling routes (to mitigate the poor PTAL rating).	<ul style="list-style-type: none"> - Walkability/local connectivity improvements
	Neighbouring Uses	Residential		
	Walkability	Fair - good		
5. To foster sustainable economic growth	PTAL	2 (poor)	Site currently occupied by industrial uses in poor quality buildings. Allocation of this site could encourage the redevelopment of an underused plot of land in a traditional residential neighbourhood, potentially supporting continued (potentially more space efficient, growth sector) employment uses on site, or more generally seeking to support local businesses through provision of new customers and local employees. Transition effects would be managed through Managed	<ul style="list-style-type: none"> - Mitigation measures to protect employment at this location by employment-led designation and Managed Transition criteria: - Consistency with spatial strategy - Supporting regeneration objectives
	Allocation likely to disrupt existing active business	Yes – small industrial warehouses		
	Allocation likely to provide net additional space for business use	No.		
	Access to freight network (road / rail / water)	Road access good. Rail access low (16min walk		

		to Manor Park Station). Water access none.	Transition criteria. As such allocation would have a positive impact on economic sustainability and will present opportunities to improve personal and economic resilience.	
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No	Good level of access to a range of facilities, Manor Park Local centre is within a 10 minute walk. Wanstead Flats are located within a 5 minute walk of the site.	- Activation of neighbourly development policy to secure compatibility with existing uses that may prevail (e.g. surrounding residential properties)
	Sufficiency data? / Existing Provision	<p>Greenspace: SINC and Pocket Park within 400m. Local Park and MOL within 800m.</p> <p>Medical: GP and pharmacy within 400m.</p> <p>Education: Nursery, Primary and Secondary Schools within 400m.</p> <p>Childcare: Little Ilford has 1 under 5s childcare place per 9 resident children. This is below the Newham average. Little Ilford has 1 over 5s childcare place per 13 resident children which is above the Newham average. However, Little Ilford is adjacent to Manor Park and East Ham North which both have above average provision of both under and over 5s childcare and are within reach of Little Ilford</p>		

	Scope for visibility improvements to existing facilities	No		
7. To promote resource-efficient development, design and construction	Re-use / intensification of previously developed / underused land	Yes	<p>Re-development for residential /mixed use purposes would comprise a more efficient use of land commensurate with the sites' location in an established residential area of the borough.</p> <p>New build is likely to be more energy efficient than the current position, given relevant policy framework.</p> <p>Policies promoting re-use and recycling should be activated.</p>	<ul style="list-style-type: none"> - Re-use of materials and improved efficiency of land use / energy efficient build - Maintain / enhance access to sustainable mode of transport
	PTAL / local access to facilities	2 (poor) / Poor (nearest Local Centre (Manor Park) and Town Centre (Ilford) are both >400m)		
	Freight access by water or rail (e.g. for construction)	Moderate, close to Ilford junction but within dense part of borough		
	Scope for re-use of buildings / materials	Limited		
	Proximity to heat network	More than 1km from existing or proposed		
8. To improve air and water quality	Close to water bodies / SPZs	No / No	<p>Allocation would not introduce harmful uses.</p> <p>Redevelopment provides an opportunity for activation of air quality relevant policies (including incorporation of GI), inclusion of SUDS will improve quality of surface water runoff.</p> <p>Redevelopment provides the opportunity to implement other air quality related policy requirements (such as improving access to sustainable modes and avoiding an increase in car use).</p>	<ul style="list-style-type: none"> - Implementation of air quality policies - SUDS to improve runoff quality - Enhance access to sustainable modes of transport
	AQMA	No, but whole borough likely to be designated		
	PTAL	2 (poor)		
	Likelihood of land contamination	High		
	Impact on trees / GS	Negligible (couple of mature trees on site)		
	Disruption of vehicle-heavy, polluting or contaminative use	Yes / Potentially		
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	2 (poor)	<p>Given the site's low accessibility, allocation would seek opportunities to improve the site's access to public transport and promote sustainable modes with any development at this location, important given that increased housing may otherwise increase generation by car.</p>	<ul style="list-style-type: none"> - Activation of sustainable transport policies (INF1, INF2, INF7, SP1, SP2, SP3 and SP8) will: <ul style="list-style-type: none"> - Reduce dominance of car-based access - Improve sustainable

				<ul style="list-style-type: none"> travel connectivity, - Capacity and reliability
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	Unknown	Whilst redevelopment of the site will inevitably create some waste, the policy framework as scoped will serve to minimise and mitigate, both in construction and ongoing use, with the scope to design in more efficient waste management than presently provided for.	<ul style="list-style-type: none"> - Minimise waste generation and maximise reuse and recycling through design (through activation of SP8, INF4 and other policies as scoped)
	Access to road network / proximity to waste facilities	Constrained, area already served by LBN waste collection		
11. To minimise and reduce flood risk	Flood zone	FZ1	Given policy framework as scoped, re-development would not worsen flood risk at this location in a flood zone, and has the potential to improve local drainage through incorporation of SUDS.	<ul style="list-style-type: none"> - SUDS to improve local flood resilience - Relevant flood risk assessment
	CDA	No		
	TE2100 strip	No		
	Proportion of impermeable surface	Whole of site		
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	<400m (cemetery)	Allocation and redevelopment provides an opportunity to implement scoped biodiversity policies and thereby improve the sites' habitat offer compared to the current relative lack.	<ul style="list-style-type: none"> - Implementation of biodiversity / GI policies
	Aerial review of site greening	Negligible, couple of mature trees		
	Natura 2000	No		
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	Durham Road conservation area within 1200m	Development of this site raises no heritage or character considerations. Opportunity lies in better reflecting prevailing local residential character.	<ul style="list-style-type: none"> - None
	Nearest Listed Building (grade)	St Marys Church Grade II, Church St within 400m Locally listed Sri Murugan temple, Browning Road within 400m		
	Nearest ATV	Manor Park		
	Incongruous / poor quality buildings on site	Yes		
	APA	No		
	Proximity to ACV	N/a		

	Potential to enhance other character assets (parks, stations etc.)	No		
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Community Facility Sites

These sites have been grouped as the factors that most effect the impact assessment (existing use, nature of allocation) are primarily the same. All sites are schools or health facilities in active use, all have been identified as having the potential for modernisation / enhancement / expansion as part of estates' strategies to ensure logical delivery of services. For example, where land-holdings would facilitate intensified configurations, or where need is greatest. The allocation as community facilities will mean in each instance the education or health use will be preserved. For more information, see [Social Infrastructure OA](#).

					nb where an objective # does not appear here, data does not change per site																								
CN	Ref	Site Name	Postcode	Area	1 (eq)			2 (health)			3 (s.places)			7 (resources)		8 (air/wat.)		9 (transp.)			11 (flood)		12 (biodiv.)		13 (heritage)				
					LSOA IMD	P-Sch	S-Sch	Health	Parks	Noise	TC/LC	Land	Noise	DH	SPZ	AQMA	PTAL	FZ	CDA	Permea.	SINC	CA	LB/LLB	ATV	APA	Assets			
CH	CF02	West Beckton Health Centre	E16 3UB	0.240%	Adj.	Adj.	is	LP<400	n/a	TC<1200m	Y	tbc*	<800m pot.	N	N	2	2	N	~0	<400m	N	N/N	N	Y3	N				
	CF08	Eleanor Smith School (Lawson Close)	E13 9HN	0.220%	Adj.	in	n/a	LP<400	n/a	TC<1200m	Y	tbc*	<800m pot.	N	N	2	2	N	~0	<400m	N	N/N	N	Y2	N				
	CF09	Eastlea Community School and Star Primary	E16 4NN	6.220%	in	in	n/a	LP Adj.	n/a	TC<400m	Y	tbc*	potential	N	Y	2	3	N	>50	Adj.	N	N/Y	N	N	Y3				
	CF07	Scott Wilkie Primary School	E16 3RU	2.320%	in	Adj.	n/a	LP in	n/a	LSP<400	Y	tbc*	<800m pot.	N	N	1b	2	N	>50	<400m	N	N/N	N	N	Y2				
Be.	CF01	Tollgate Medical Centre	E6 5JS	0.410%	<400	<400	is	LP<400	n/a	In TC	Y	tbc*	<800m pot.	N	N	3	3	N	30	<400m	N	N/N	N	Y3	N				
EH	CF11	Brampton Manor Academy	E6 3SW	8.240%	in	in	n/a	PP<400	n/a	TC<800	Y	tbc*	>800 either	N	Y	1a	2	N	50	in	N	N/N	N	Adj	N				
	CF14	Site at Flanders Road	E6 2PP	0.920%	Adj.	Adj.	n/a	LP<400	n/a	LSP<400	Y	tbc*	<800m pot.	Y	Y	1b	3	N	75	in	N	N/N	N	Adj	N				
	CF12	Langdon Academy	E6 2PP	18.020%	in	in	n/a	LP<400	n/a	LSP<400	Y	tbc*	<800m pot.	Y	Y	1b	3	N	75	in	N	N/N	N	Adj	N				
FG	CF03	Lord Lister Health Centre	E7 0EP	0.240%	<400	<400	is	PP Adj.	n/a	Adj. TC	Y	tbc*	>800 either	Y	N	4	1	N	~0	<400m	Adj.	N/Adj.	<400m	N	N				
	CF22	Maryland Children Centre and Primary School	E15 1SL	1.030%	in	<800	n/a	PP <400	n/a	TC <800	Y	tbc*	>800 either	Y	N	3	1	N	10	<400m	N	N/N	N	Adj	N				
	CF21	Odessa Infant School & St James Primary	E7 9DA	1.220%	in	<400	n/a	PP <800	n/a	TC <400	Y	tbc*	>800 either	Y	N	3	1	Adj.	20	<100	N	N/N	N	N	N				
	CF13	Forest Gate Community School	E7 0HY	1.020%	<400	in	n/a	PP<400	n/a	Adj. TC	Y	tbc*	>800 either	Y	N	3	1	Adj.	~0	<400m	Adj.	N/Adj.	<400m	N	Y1				
MP	CF04	EH Memorial Hospital & Shrewsbury Rd Med.	E7 8QP	1.430%	<400	<400	is	LP<400	n/a	TC<400m	Y	tbc*	>800 either	N	N	3	1	N	~0	<400m	N	N/Y	N	Y2	N				
Pla.	CF05	Balaam Street Practice	E13 8AF	1.220%	<800	<800	is	LP<400	n/a	LC<400m	Y	tbc*	>800 either	N	N	4	1	N	0	Adj.	N	N/N	N	Y2	N				
	CF15	Eleanor Smith School (North Street)	E13 9HN	0.520%	in	<400	n/a	LP<400	n/a	LC<400m	Y	tbc*	>800 either	N	N	3	1	N	10	<400m	N	Adj./N	N	Y2	N				
	CF20	Newham Sixth Form College	E13 8SG	3.620%	Adj.	<200	n/a	LP<800	n/a	LC<400m	Y	tbc*	>800 either	N	Y	4	1	N	>50	<200m	N	N	N	N	N				
SWH	CF17	Colegrave Primary School	E15 1JY	1.230%	in	<800	n/a	PP<400	n/a	LC<400m	Y	tbc*	<400m exist.	Y	N	4	1	N	20	<400m	<400m	N/N	N	N	N				
	SF19	Sarah Bonnell school	E15 4LP	1.830%	<400	in	n/a	LP<400	n/a	In TC	Y	tbc*	<800m exist.	Y	N	5	1	N	~0	<400m	Adj.	Adj/Adj	N	Y2	N				

where % = most deprived	Where LP is Local Park & PP is Pocket Park.	*defra website down	as per GLA's Heat Map	All borough likely to be AQMA	2-poor, 3-moderate, 4-good etc	where # is % of site that is grassed	where 'in' = intersects	where N is none noted. 1. Forest Gate station / Town Centre / 2. King George V Park / 3. Star Park
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NB none of the sites have existing allocations save for the site at Flanders Road, which already has a partial allocation for school use; this does not affect the outcome of the IIA. Extant permissions have not been listed individually; as the sites are all in the ownership / control of the relevant service providers, any recent consents would only be for modifications such as extensions, and would not affect the deliverability of the allocation.

IIA Objective	Relevant Data	
1. To reduce poverty and promote equality of opportunity	LSOA IMD	See above
	PTAL	See above (obj.9)
	Proximity to employment land	The nature of the borough is that all sites are near to some form of employment land. As part of review strategies, the sites identified for intensification are logically dispersed according to need
	Proximity to schools	See above
2. To support healthier lifestyles	Health facilities	Either is a health facility, or a school (in which case proximity not deemed relevant to the IA)
	Parks	See above
	Distance to nearest Town centre or local centre	See above (obj.3)
	Sports facilities; opportunities for active travel	Not relevant
	Hot food Takeaway Hotspot/access to fresh healthy food	Not relevant
	Noise levels	See above (obj.3)
	Air Quality	See above (obj.8)
	Likelihood of land contamination	Normal
3. To create successful neighbourhoods	Proximity to community facilities	Sites are CF
	Proximity to identified centre	See above
	PTAL	See above (obj.9)
	Under-used / derelict land	Yes (all identified as suitable for intensification)
	Noise	See above
4. To ensure people have access to a choice of good quality housing that meets their needs	PTAL	See above (obj.9)
	Neighbouring Uses	All sites have surrounding/ nearby residential
	Walkability	Fair to good, all sites
5. To foster sustainable economic growth	PTAL	See above (obj.9)
	Allocation likely to disrupt active emp. use or support it?	Support

	Allocation likely to provide net additional space for emp. uses?	Yes
	Access to freight network (road / rail / water)	Not relevant
6. To ensure inclusive access to a range of high-quality community facilities and open space	Loss of community facility or open space	No re CF, re OS See adjacent
	Sufficiency data / potential for gain in underserved locations	Yes (all sites identified as part of strategic reviews by CCG / education)
	Scope for visibility/other improvements to existing facilities	Yes
7. To promote resource-efficient development, design and construction Lizzie	Re-use / intensification of previously developed / underused land	Yes
	PTAL/local access to facilities	See above (obj.9/3)
	Freight access by water or rail (e.g. for construction)	Not relevant
	Scope for re-use of buildings / materials	Yes
	Proximity to heat network	See above
8. To improve air and water quality	Close to water bodies / SPZs	No waterbodies, see above for SPZ
	AQMA	See above, though whole borough likely to designated AQMA
	PTAL	See above (obj.9)
	Likelihood of land contamination	Normal
	Impact on trees / GS	Yes, all sites contain mature trees, larger sites have expanses of playing fields
	Disruption of vehicle-heavy, polluting or contaminative use	No
9. To increase the proportion of journeys made by sustainable modes of transport	PTAL	See above
10. To minimise the production of waste across all sectors and promote the proximity principle	Are existing uses high waste generators	n/a (use will be same)

	Access to road network / proximity to waste facilities	n/a (site already served)
11. To minimise and reduce flood risk	Flood zone	See above
	CDA	See above
	TE2100 strip	No
	Proportion of impermeable surface	See above
12. To enhance and protect existing habitats and biodiversity	Proximity to SINC	See above
	Aerial review of site greening	All sites contain mature trees, larger sites have expanses of playing fields
	Natura 2000	No
13. To enhance character, protecting, conserving and enhancing heritage and other character assets	Nearest CA	See above
	Nearest Listed Building (grade)	See above
	Nearest ATV	See above
	Incongruous / poor quality buildings on site	Design policies = room for improve
	APA	See above
	Proximity to ACV	None near
	Potential to enhance other character assets (parks, stations etc.)	See above

Summary Assessment

These allocations present an opportunity to retain the site's social infrastructure function, whilst bringing forward improved provision and a higher quality of building / facilities. Compared to the status quo, allocation and the redevelopment likely to flow from it provides an opportunity for various high quality development requirements to take effect: better energy efficiency standards, ensuring inclusive access through design, improved layout of sites to enhance public transport accessibility etc. The improvement of social infrastructure provision serves to better the quality of local housing, the resilience of the local

workforce, and the success of places overall. Given the already existing use in each instance, any negative impacts are likely to be negligible; again, the policy framework as scoped provides for mitigation where required.

Site allocations should address:

- Implementation of plan requirements relating to drainage, air quality, flood risk, energy efficiency, waste management, inclusive accessible design, biodiversity & green infrastructure, and land contamination.
- Appropriate building heights that optimise the potential of a site whilst being sensitive to the site's heritage and local context.
- The securing / enhancement of sustainable transport access and permeability.
- Activation of 'multi-user' requirements (INF8)

Appendix 5 – EQIA: Equalities and the Local Plan

Proposed Submission, November 2017

Contents

1	Introduction	380
	Purpose	380
	How has this work been undertaken?	380
	A ‘live’ document	380
	Structure of the document	381
2	Newham’s Approach to Equality and Community Cohesion	382
	Building Community Cohesion.....	382
	Overview of Engagement Undertaken	384
3	Prevalence and distribution of equalities groups in Newham	385
	Newham’s diversity	385
	Equalities groups within Newham – spatial patterns and overlaps	391
	Ethnic groups, recently arrived migrants and asylum seekers.....	391
	People of Faith	393
	Disabled People and Carers	393
	Older people	394
	Younger people.....	395
	Women, including lone parents, and those who take on the majority of childcare and home-making	396
	LGBT people	397
4	Issues and Aspirations Relevant to Spatial Planning in Newham by Equalities Group.....	398
	Deprivation, Regeneration and Equalities Groups	398
	Environmental Injustice in Newham.....	399
	Older People, Disabled People and their Carers	399
	Ethnic groups, (other than gypsy travellers) recently arrived migrants and asylum seekers	401
	Gypsy-Travellers.....	404
	People of faith.....	405
	Younger People	407
	Women including lone parents and those that take on the majority of child-care and home-making	409
	LGBT people	411
5	Conclusions and Action Points	412
	Conclusions and the policy formulation checklist	412
6	Summary Checklist for consideration through the Local Plan to ensure equality of opportunity, social and environmental justice and social inclusion and cohesion	416
	References.....	420

1 Introduction

Purpose

- 1.1 This paper sets out the information and understanding we have gathered regarding equalities groups¹ in Newham and their particular needs, issues and aspirations that we need to be aware of in the process of equalities impact assessment of spatial planning strategies and policies. As such, it is intended to be of relevance to the preparation of all planning policy documents. This understanding is carried through into a checklist against which policy directions, options, and draft policies can be assessed. This has been and will continue to be applied as the Local Plan develops, with conclusions and action points amended accordingly. It is included within the Integrated Impact Assessment as in effect, this evidence base generates the basis of an Equalities Impact Assessment.

How has this work been undertaken?

- 1.2 The process of information-gathering and assessment has occurred concurrently with a wider process of issues and options scoping and evidence base generation, commencing in 2016, building on earlier work between 2010 and 2012. This work has been undertaken by the Planning Policy Team in close liaison with colleagues in Corporate Policy and Research, drawing on a process of continuous engagement with stakeholders, including local residents themselves. Anyone is welcome to comment on it and contribute to its completeness and accuracy.

A 'live' document

- 1.3 This document is however, not an end-point, and we will continue to re-visit the equalities evidence base as engagement and other research continues, updating and widening our understanding. This is particularly relevant as we work within a wider corporate research, consultation and engagement context to avoid consultation fatigue and make best use of resources. The

¹ Equalities groups are those covered by legislation concerned to prevent discrimination and promote equality of opportunity on grounds of gender, age, race/ethnicity, faith, sexual orientation, disability and caring responsibilities, and socio-economic background. They therefore conventionally comprise the following [and any combination – inequality is often experienced on multiple grounds]:

- Older and younger people and their carers
- People of different faiths
- People of different, (particularly minority) ethnic backgrounds, including gypsy-travellers
- Lesbian, Gay, Bisexual and Transgender people
- People with disabilities and their carers
- Women
- Less affluent socio-demographic groups.

checklist included in the Integrated Impact Assessment will provide evidence of this process at appropriate points, and comment on the evolving picture in the conclusion.

Structure of the document

- 1.4 The paper firstly sets out the corporate approach to equalities, which provides the context to this work. It then gives an overview of the engagement undertaken with equalities groups or representatives of them, both directly in connection with the Local Plan, and indirectly through events and exercises with wider corporate purposes. Our understanding of the prevalence, overlap and spatial distribution of such groups (both through residence and their day-to-day activities) in Newham is then set out. From this, it is possible to draw out an understanding of how development in particular areas, and the borough as a whole needs to be sensitive to the needs and aspirations of equalities groups. Lastly, the particular needs and aspirations of such groups that we have identified both through engagement and other resources² as relevant to spatial planning, are highlighted, whilst reflecting on the commonalities between them, and those expressed by the wider population.
- 1.5 The conclusion presents a structured way of approaching equalities issues in the Local Plan going forward, enabling a proactive and focused approach to equalities impact assessment.

² Notably the Mayor of London's SPG Equality and Diversity in Planning; see also the references section at the end of the paper.

2 Newham's Approach to Equality and Community Cohesion

2.1 Newham's approach to Equality and Diversity is about ensuring all of our residents are able to take full advantage of opportunities and fulfil their potential. This is a key part of our vision to build resilience. The Council's values, policies and services are designed to ensure we both meet our legal duties, and actively working to eliminate inequality and build a sense of belonging in Newham.

2.2 This is underpinned by a clear commitment to:

- Treating individuals equally and respectfully.
- Using research to establish where there is disadvantage and ensure we understand and tackle its causes
- Eliminating discrimination based on age, gender, race, disability, sexual orientation, belief and class (socio-economic status).
- Ensuring everyone has the opportunity to fully participate in community engagement and decision making.
- Building the capacity of individuals to realise their aspirations.
- Valuing diversity as a community leader, an employer and a service provider.

Building Community Cohesion

2.3 Newham is the most diverse local authority area in the country, where people from many different backgrounds and cultures come together. We celebrate our diversity, which is one of our greatest strengths. However, we also know that the Council has a proactive role to play in building community resilience, promoting fairness, and helping all our residents come together as one community.

2.4 Our approach is built on three core areas:

1) **Building common ground:**

When you have lots of people with different background coming from all over the world, part of our job as a council is to help build common ground. That is why:

- We make sure that when people use our community assets or council funding, it is for inclusive events that are open to all residents - not restricted according to particular religious or ethnic groups.

- We continue to fund free English Language tuition open to all, despite cuts in government funding. We know that speaking English is a key part of building a shared identity and enabling everyone to play an active role in the community.
- We celebrate people's cultures and backgrounds in an inclusive way, encouraging the whole community to get involved. Our community events embrace residents' cultures, and we raise the national flag of the countries many of our residents come from on their national day.
- Our annual Faith Conference brings together different faith groups to build dialogue, and encourage residents to work together shared local priorities.

2) Bringing people together

Cohesion requires regular communication between people from different backgrounds, helping to build relationships, develop a common sense of purpose, and dispel myths and suspicion. We are committed to doing everything possible to build mixed communities and to enable the people of Newham to build strong relationships with other members of the community. That is why:

- Our programme of free Community events bring people from all background together, with events such as the Mayor's Newham Show and the Under the Stars festival attended by thousands of residents. Our 'Let's Get the Party Started' small grants scheme also supports residents to host street parties and other events.
- Our housing policy aims to create sustainable, mixed communities that reflect the diversity of the borough as a whole. We believe that in the interests of cohesion, our neighbourhoods must be mixed by class, ethnicity and tenure.
- Our community neighbourhoods approach is at the heart of our efforts to build community resilience, and aims to empower the local community to come together and make a difference in their local area. Hosting over 500 events per week on average, we encourage residents from all background to get involved, whether providing opportunities to volunteer; learning new skills such as IT skills; or simply attending one of our coffee mornings or joining in with activities in our libraries.

3) Promoting fairness:

In order for community cohesion to exist there must be a sense that everyone is treated fairly and has equal access to public services. We are determined to avoid jealousy, suspicion and prejudice, and we are committed to even-handedness and transparency in the provision of all of our services. To ensure a fair deal for all:

- We invest in enforcement to make sure everybody plays by the rules, including strong enforcement of regulations on housing to drive out rogue landlords and improve housing conditions, and on environmental crime.
- Our housing allocations criteria is based on a clear first-come, first-served principle and rewards contribution, with a residence criteria and people in work or caring prioritised. We are ensuring that nobody is 'jumping the queue' for housing in Newham.
- We ensure our services are accessible and open to everyone. In taking a mainstream approach to service provision, we recognise that sometimes people and certain groups within the community face barriers which prevent them accessing services or facilities, and in these circumstances the Council has a duty to ensure we remove these barriers.

Overview of Engagement Undertaken

- 2.5 The engagement audit trail maintains a log of engagement undertaken on an ongoing basis, which is used to keep this document live. Whilst in general a mainstreaming approach has been followed, with engagement activities designed and monitored to ensure that they incorporate a range of views from residents from all walks of life, these have been supplemented with some specific engagement with those groups that are 'typically under-represented' in mainstream consultation. This can also help to give us a more clearly articulated steer as to specific issues faced by particular equalities groups, rather than them being subsumed by the majority view (although the latter is of no less importance). In 2015-17, relevant information was gained from engagement with councillors and youth councillors, local residents at the Mayor's Show, and engagement on the Gypsy and Traveller Accommodation DPD, including a meeting with local site residents.

3 Prevalence and distribution of equalities groups in Newham

Newham's diversity

3.1 Newham, in common with many inner London authorities is a visibly (and audibly) diverse and young borough, which in relation to equalities groups means that:

- Varied ethnic groups are more prominent than elsewhere in England, and even than in many parts of London. At the last census 71% of Newham's population were from BAME groups³, indicating an increase in diversity across the borough since the 2001 Census. The 2016/17 Annual Population Survey⁴ indicated a decrease to 66.5%, mainly driven by increased international migration from Eastern Europe⁵. The annual School Census 2016 found that 74.2% of primary school pupils (and 66.3% of secondary school pupils) in state-funded schools within the borough did not have English as their first language⁶.
- Christian and Muslim faith groups are the most prominent, (39.9% and 31.9% of the population respectively according to the latest census), with Christianity less commonly practised than elsewhere, and Islam more common; Hindus and Sikhs are also present in relatively high numbers (8.7% and 2.0% respectively). However people with no faith equate to 9.5% of the population according to the 2011 Census⁷ or 17% according to the more recent Newham Householder Panel Survey⁸ (2016).
- Newham continues to have a younger population profile than other areas, the GLA's 2016-based population projections estimate that in 2016 over 65s account for 7.1% of the population compared to 9.0% for Inner London and 11.6% for London overall⁹. Conversely, those under 25 account for around 35.8% of the population compared to 30.34% for Inner London and 31.3% for London overall. By further comparison ONS statistics indicate even older age profile for England and Wales, with 30.1% under 25 years and 18% over 65 years¹⁰.

³ Census and ONS data accessed from Office of National Statistics Online

⁴ Nomis, Annual Population Survey 2016/17

⁵ ONS 2017, Population by country of birth and nationality underlying datasets

⁶ Department of Education (2016), Schools, pupils and their characteristics: January 2016

⁷ GLA (2014) Percentage of Population by Religion, Borough, Census 2011 data

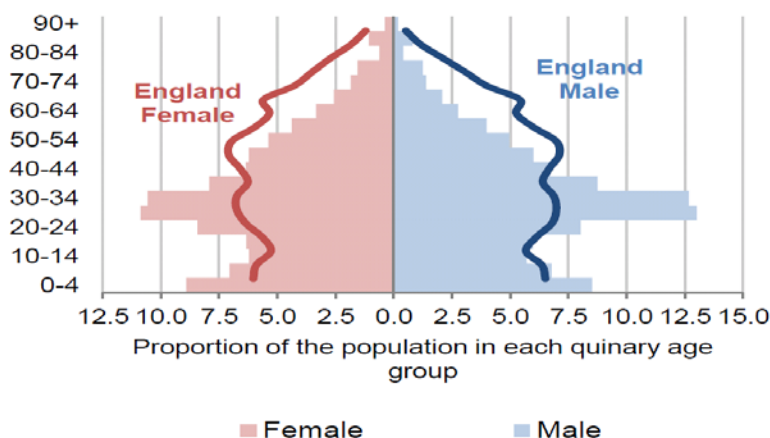
⁸ LBN (2016) Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁹ GLA (2017), 2016-based population projections, central trend

¹⁰ Nomis, Annual Population Survey 2016/17

- Although there is a marginally larger proportion of men within the borough, gender is roughly balanced as might be expected, except among older people due to the longer life expectancy of women – see Figure 1 overleaf.

Figure 1: Population pyramid for Newham compared with England, ONS 2015-mid-year estimates



Source: Newham, Children and Young People JSNA 2016

- Lone parent households were recorded in the last Census as making up 10% of all households in Newham, slightly higher than the average of 8% across London. Following typically patterns, 93% of the total lone-parent households comprise female lone-parents. In 2016, full-time home-makers are predominantly women and account for 14% of the total of economically inactive female population, higher than the average for London which accounts for 9.5% of inactive women¹¹.
- Though information about sexuality is hard to come by, census data about people living in same-sex couples points to a relatively small LGBT population (around 637 people, or 0.3% of the over 16 population) . This is borne-out by more recent ONS data on Marital and Civil Partnership Status as well as civil partnerships register¹², which shows much lower rates than other Inner London authorities, with only 247 civil partnerships registered during 2006-2015 in Newham, out of 11,911 civil partnerships recorded in Inner London for the same period.
- Disabilities, long-term limiting illnesses and associated carers are present at relatively high levels in the borough. Latest Annual Population Survey¹³ data indicates that 12.6% of the economically inactive working age population were found to be suffering from a limiting long term illness in

¹¹ Nomis (2017), Annual Population Survey 2016/17

¹² GLA (2016), Civil Partnerships

¹³ Nomis (2017), Annual Population Survey 2016/17

2016/17, below London average— see Figure 2 overleaf. As per 2011 Census, 24% of the households in Newham had at least one person with a limiting long term illness¹⁴. In May 2016 0.8% of the working age population were in receipt of Disability Allowance, a downward trend, while 1.7% were receiving Carer’s Allowance, a growing trend¹⁵ - see Figure 3 overleaf. The number of working age people receiving Employment and Support Allowance or Incapacity Benefits has also reduced from 5.9% in May 2011 to 5.0% in May 2016, in line with wider London and national trends.¹⁶

- As the latest census showed, there are relatively high levels of people in routine and semi-routine occupations (22.3% of the total of working age residents) and relatively low levels of people in higher managerial and professional occupations¹⁷

- While Newham was considered the 2rd most deprived local area in both London and England when assessed by the Index of Multiple Deprivation 2010, the 2015 release of the Index showed improvement, with Newham now being ranked as the 4th most deprived local authority in London, and 8th in England¹⁸. When measured by extent of population living in most deprived LSOAs, Newham is now ranked 25th in England, up from 2nd. Mapping of deprivation at LSOA level is included as Figure 5 (pg.14) for the Index of Multiple Deprivation 2010 and Figure 6 (pg.15) for Index of Multiple Deprivation 2015. The domains that have seen the least improvement include Income, Barriers to Housing and Services, and Crime¹⁹. The latest Newham Household Panel Survey identified that 35% of residents were living in poverty, rising to 46% after considering housing costs²⁰.

- As per the Council’s own research surveys, 43% of all Newham residents were worried about being a victim of crime in their local area in 2016, this represents a considerable rise since 2015 (37%) and 2014 (40%) surveys²¹.

¹⁴ ONS (2011) Adults not in Employment and Dependent Children and Persons with Long-Term Health Problem or Disability for All Households

¹⁴ DWP, Benefit Claimants, available from www.nomisweb.co.uk

¹⁶ Nomis, Benefit Claimants

¹⁷ Census and ONS data accessed from Office of National Statistics Online

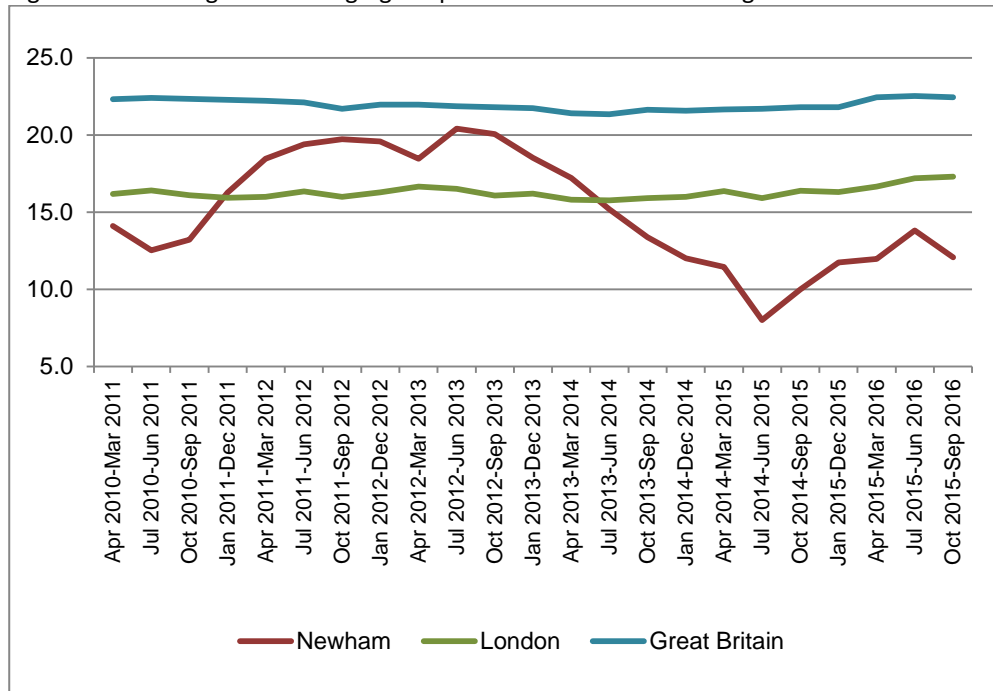
¹⁸ DCLG, The English Indices of Deprivation 2015, by rank of average rank

¹⁹ DCLG, The English Indices of Deprivation 2015, by rank of average rank

²⁰ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys; poverty measure being defined as earning less than 60% of average weekly pay.

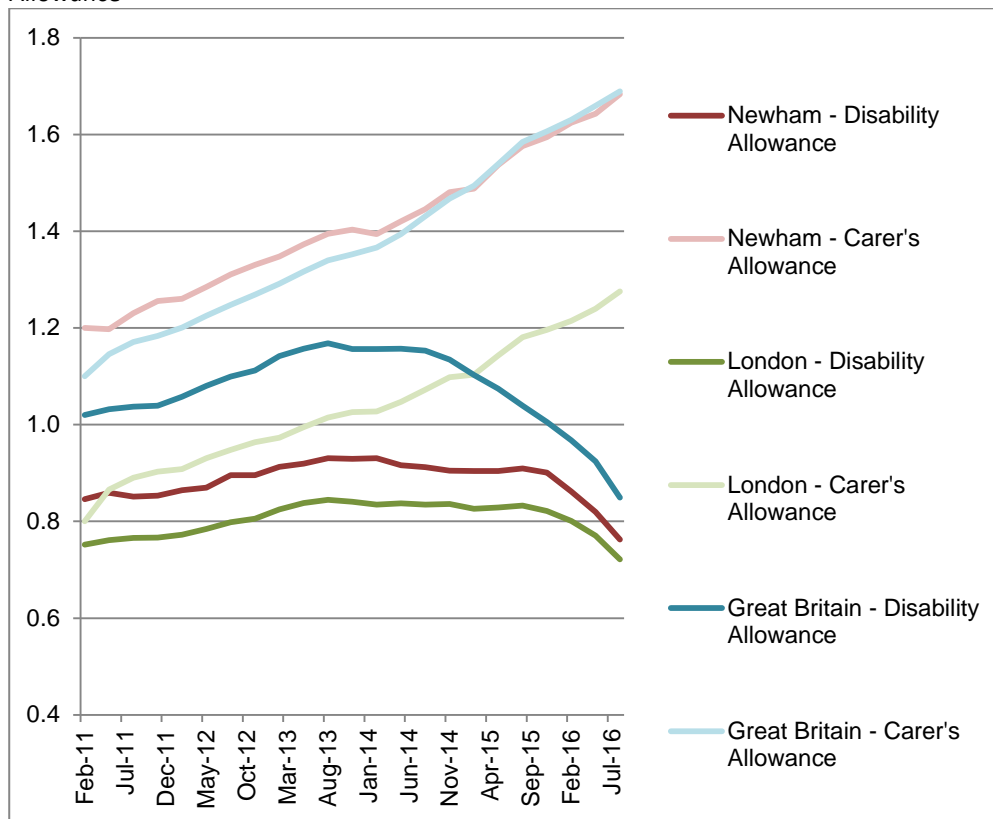
²¹ LBN (2017), Newham Survey 2016

Figure 2: Percentage of Working Age Population Inactive due to Long Term Illness



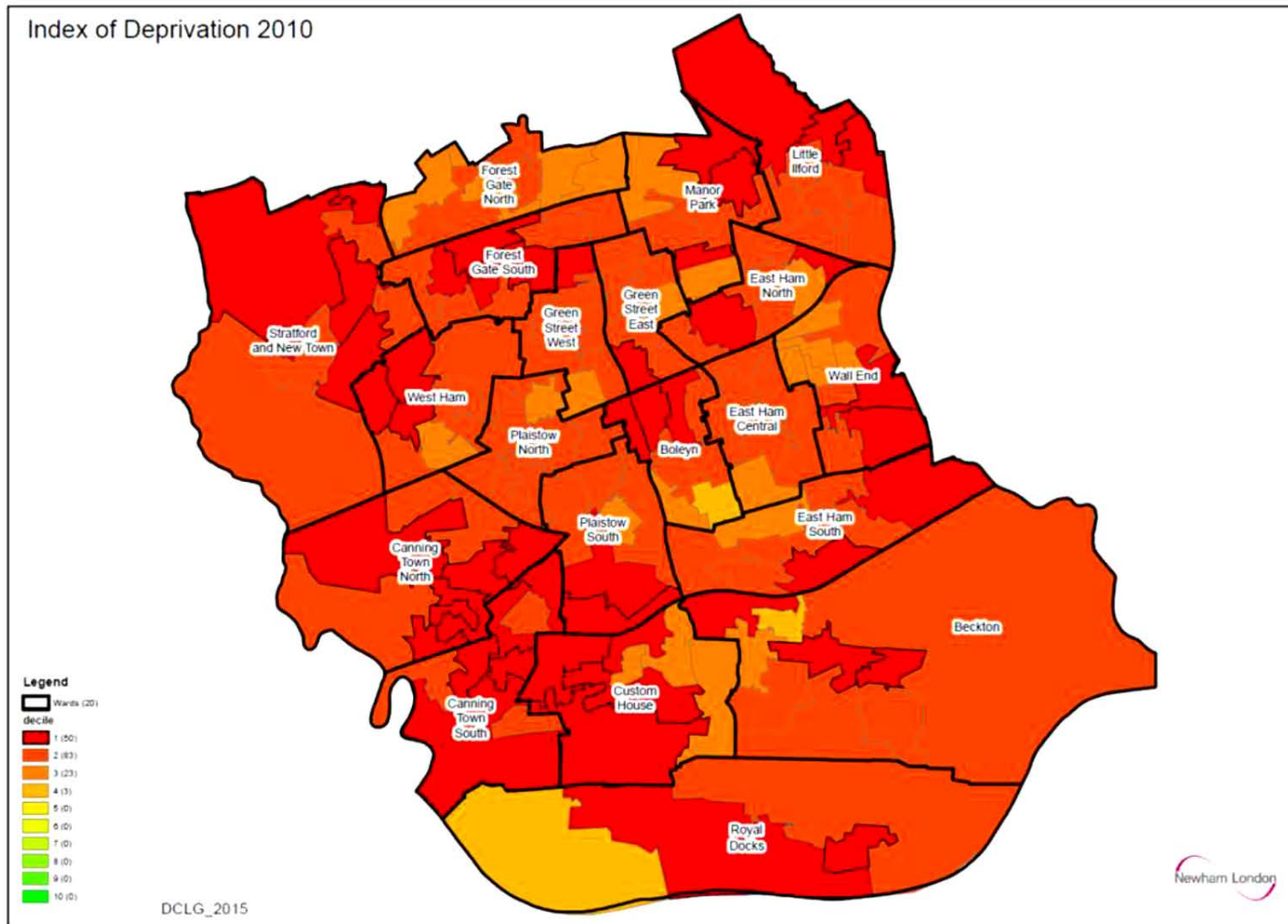
Source: ONS, Annual Population Survey, available from www.nomisweb.co.uk

Figure 3: Percentage of Working Age Population in receipt of Disability Allowance and Carer's Allowance



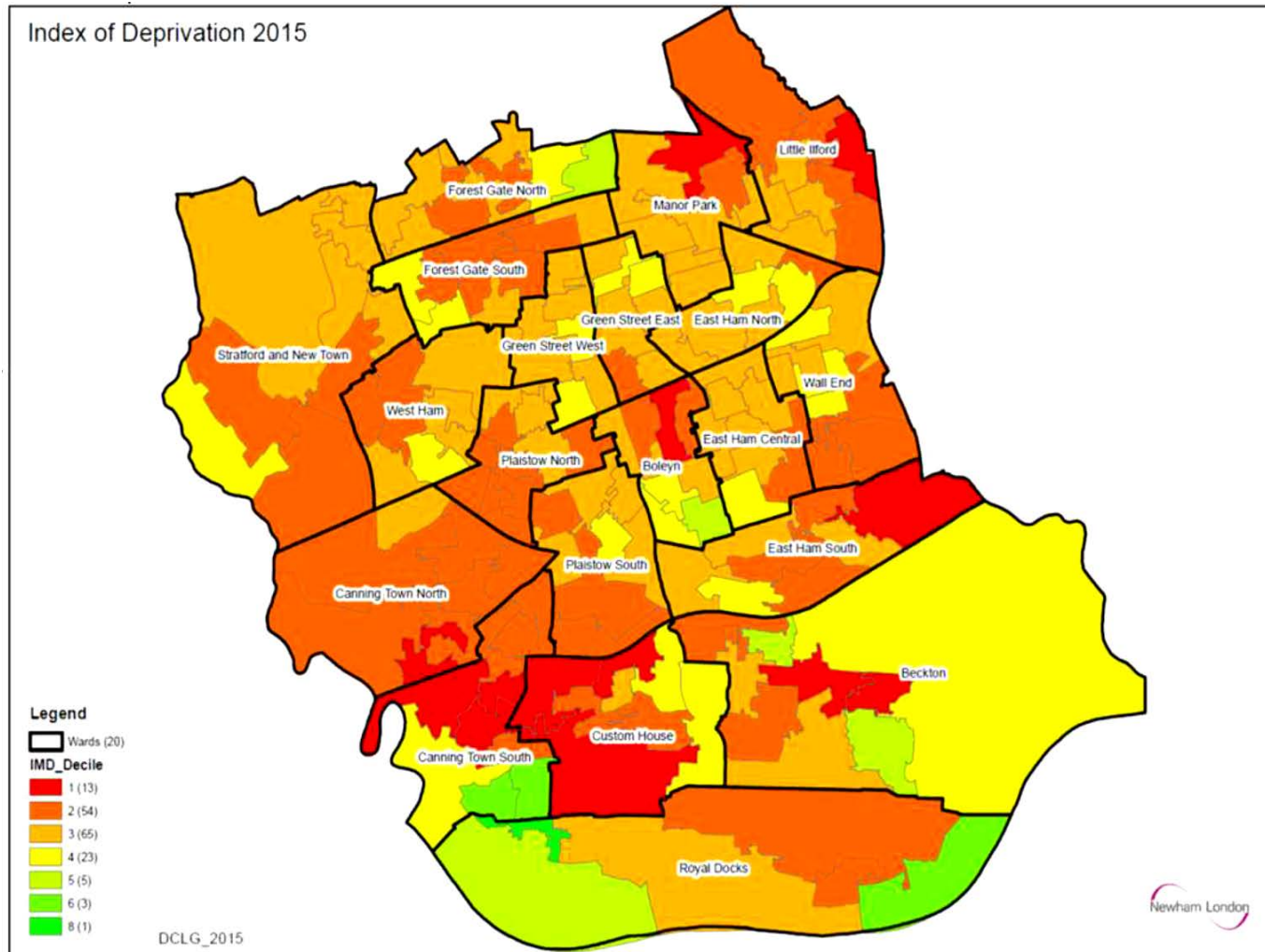
Source: DWP, Benefit Claimants, available from www.nomisweb.co.uk

Figure 4: IMD 2010 LSOAs rankings



Source: Newham, 2016, based on data from DCLG, The English Indices of Deprivation 2015

Figure 5: IMD 2015 LSOAs rankings



Source: Newham, 2016, based on data from DCLG, The English Indices of Deprivation 2015

Equalities groups within Newham – spatial patterns and overlaps

- 3.2 The following section looks at each equalities group (and some sub-groups) in more detail, considering spatial patterns in their use of variation in their places of residence, and other uses of space and overlaps in group membership where possible²². It should be noted that deprivation and socio-economic equality is tackled as a borough-wide over-arching/cross-cutting issue in the main discussion section.

Ethnic groups, recently arrived migrants and asylum seekers

- 3.3 Census data from 2011²³ - see Figure 6 overleaf - suggests that the most ethnically-mixed community forum areas (with a fairly even mix of ethnic groups) are Plaistow, Green St and East Ham, though East Ham is a focus for Asian groups, especially Indians, and Plaistow is a slight focus for people of Bangladeshi origin. In turn, Manor Park and Green Street have the largest non-white population whilst Royal Docks is the most 'white' area, closely followed by Beckton, Canning Town-Custom House, and Stratford-West Ham, though a significant proportion of this population is non-white British, particularly in Stratford-West Ham. Asian populations are most focused in East Ham and Manor Park (though Manor Park is more of a focus for Pakistani communities, East Ham Indian and 'other'). Black-African and Black Caribbean people are most concentrated in Plaistow and Canning Town, though Black Africans are also a relatively significant component of the population in Beckton, Stratford-West Ham, and Royal Docks. Royal Docks and Beckton have the highest Chinese population, while Beckton has a significant Latvians population.
- 3.4 This largely corresponds to data from a survey of town centre businesses, (2009)²⁴ which showed that the highest levels of black, Asian and minority ethnic group workforce composition were in Green St, East Beckton and East Ham town centres, with the highest levels of businesses only employing white people seen in Canning Town and Forest Gate town centres. Forest Gate would be the anomaly here – given the community forum area has one of the lower white populations, but this may reflect the smaller nature of the centre compared to the extent of the community forum area.

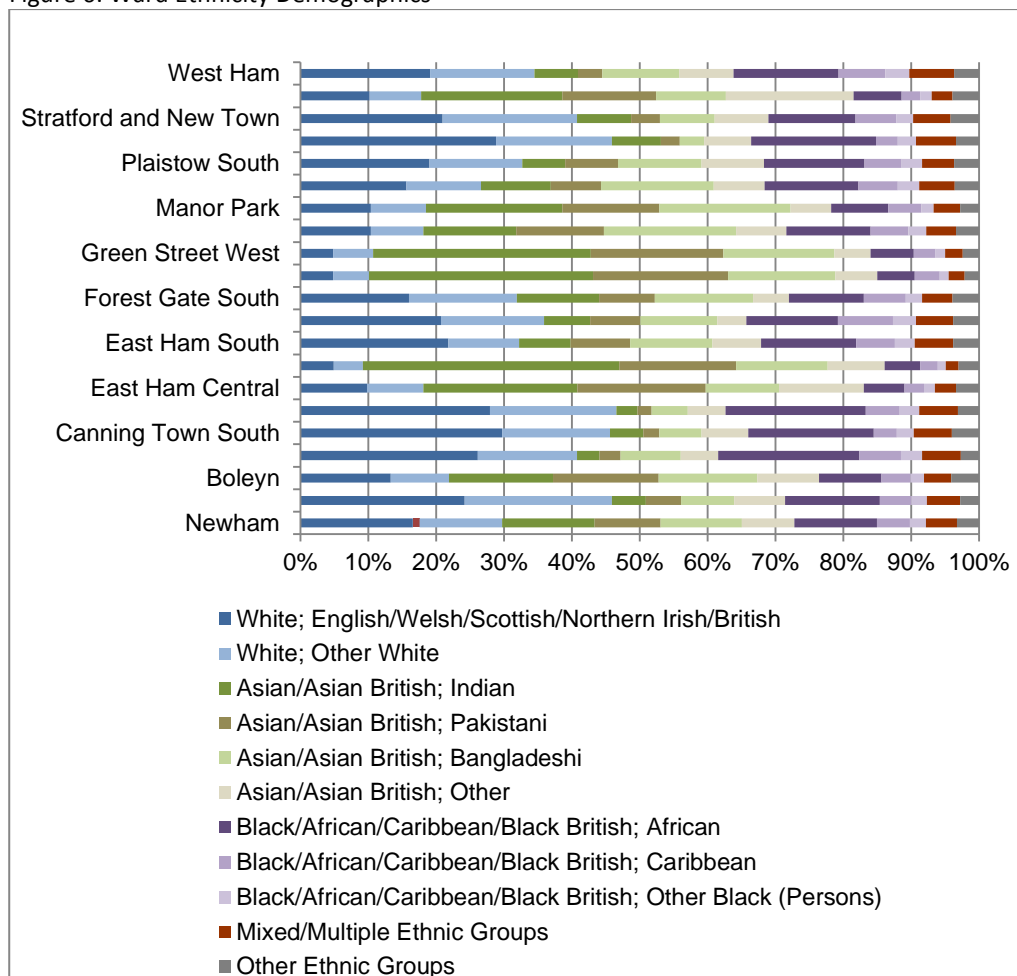
²² This section will be updated as new data becomes available. Not all data is available at lower than borough spatial levels (i.e. ward, lower super output area, community forum area etc.)

²³ ONS, Census 2011, Ethnic and age groups by ward

²⁴ Undertaken as part of the Retail and Town Centre Study 2009

3.5 In turn, information about the shopping patterns of different ethnic groups from a 2009 consumer survey²⁵ shows similarly that Green Street is an important shopping destination for Asian people and Chinese people, though for people of Indian origin East Ham, East Beckton and Forest Gate are also significant destinations, and for Chinese people, East Beckton. Black Caribbean people are significant customers at Stratford and Forest Gate, whilst Black African people are more prominent users of East Beckton and Stratford. Green St is the only centre where people of white ethnicity are not the largest group of shoppers. Canning Town, Stratford and East Beckton are most dominated by white shoppers, with the second largest ethnic groups in these locations being Indian (Canning Town, East Beckton) and Black African (Stratford). Likewise key locations for ethnic shopping (food) are Green St, East Ham and Forest Gate plus local centres at Manor Park, Plaistow High Street, Abbey Arms, Greengate, North Woolwich and shops at Maryland. Stratford is also important for specialist ethnic non-food products. The 2016 update of the Town Centre and Retail Study showed there has been little change in the function and offer of Newham's centres, indicating that the customer trends set out in the 2009 study remain relevant.

Figure 6: Ward Ethnicity Demographics



Source: ONS, Census 2011, available from www.neighbourhood.statistics.gov.uk

²⁵ Undertaken as part of the Retail and Town Centre Study 2009

- 3.6 Newham also has a small gypsy-traveller population living on a site in Stratford (15 pitches), and some in bricks and mortar housing. Further information on this group is given in the Gypsy-Travellers section.

People of Faith

- 3.7 From the more up to date ethnicity data discussed above, plus local knowledge it is also possible to surmise that Islamic, Hindu and Sikh people are more likely to be focused in Green St, East Ham and Manor Park. Christian groups are likely to be more focused in Custom House and Canning Town, Royal Docks, Beckton, Stratford and West Ham. Although a majority of Christian people are located in Plaistow and Forest Gate, it is closely followed by Islamic population²⁶. This is largely supported by data from Aston Mansfield (2013) on the distribution of religious meeting places at that time. This found that whilst Christian meeting places were most numerous and reasonably equally spread throughout the borough with predominance in Canning House and Custom House (presumably reflecting historic patterns), Muslim meeting places were clustered in the north and east of the borough (East Ham, Manor Park and Green Street, and to a lesser extent, Stratford and West Ham and Plaistow), while Hindu meeting places were to be found in mainly in Green Street then East Ham, Stratford and West Ham and Manor Park

Disabled People and Carers

- 3.8 It can generally be assumed that carers and disabled people and/or those with a limiting long term illness will be co-located. Data from the 2011 census indicates that Custom House and Canning Town, and East Ham had the highest proportion of the population reporting limiting long term illness, while Royal Docks had the lowest. Persons registered as permanently sick and disabled were relatively evenly distributed across the borough, with slightly higher levels in the South West.
- 3.9 More recent data on claimant counts however, indicates that Custom House and Canning Town had the highest proportion of the population claiming Incapacity and Disability allowance benefits, followed by Beckton. Stratford and West Ham presented the lower rate for this variable. Further high counts are found in pockets (individual lower super output areas) in Forest Gate, Green St and Manor Park²⁷. In addition, the 2011 Census data found that the community forum areas with most people with life-limiting health problems were Manor Park, Custom House and Canning Town. Overall the conclusion to be drawn appears to be that disabled people and carers are widely distributed across the borough, though Custom House and Canning Town is most likely the area where more of the population have consistently been affected by disabilities.

²⁶ LBN, Newham info (2011) Religion datasets by ward

²⁷ GLA (2014) Incapacity Benefits claimants

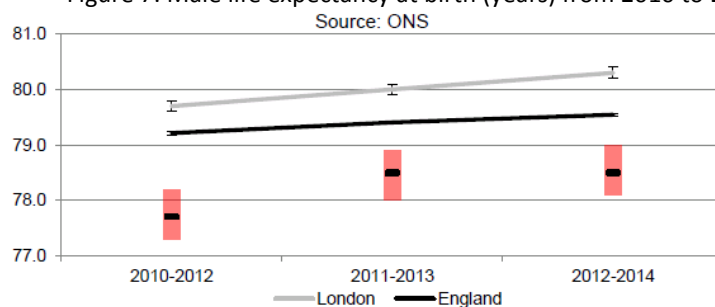
3.10 Interestingly however, the same census data showed that disabled people were less commonly employed in Custom House and Canning Town and Manor Park, with higher levels of workforce representation in Royal Docks and Stratford and West Ham, suggesting disabled people in Custom House and Canning and Manor Park may have more difficulty accessing the labour market locally.

Older people

3.11 According to the ONS population data for 2011²⁸, higher proportions of older people are found in Plaistow, Green Street, Custom House and Canning Town and East Ham. There are more older people amongst the white population and Asian population²⁹. In addition, the 2011 census reported a correlation between age and disability/limiting long term illness.

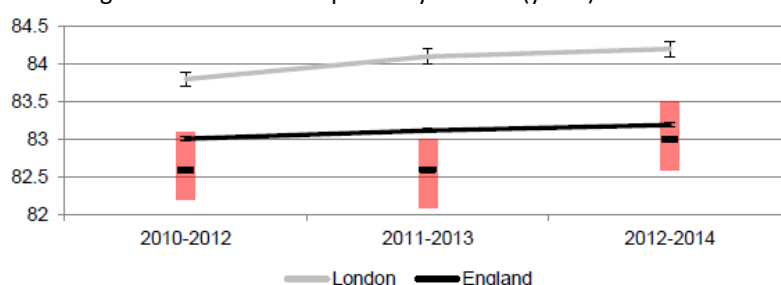
3.12 Life expectancy statistics from ONS between 2010 and 2014 indicate that life expectancy for both males and females in Newham is improving, but remains below England and London values³⁰ – Figures 7 and 8. GLA 2016-based population projections estimate that the over 65s population in Newham will increase from 7.1% in 2016 to 10.7% by 2035³¹.

Figure 7: Male life expectancy at birth (years) from 2010 to 2014



Source: LBN, Children and Young People JSNA 2016

Figure 8: Female life expectancy at birth (years) from 2010 to 2014



Source: LBN, Children and Young People JSNA 2016

²⁸ ONS, Census 2011 Population by age group and ward

²⁹ ONS, Census 2011 Ethnic groups by age group and ward

³⁰ LBN, Children and Young People JSNA 2016

³¹ GLA (2017), 2016-based population projections, central trend

Younger people

- 3.13 According to the latest Census³², East Ham, Manor Park, Green Street, and Custom House and Canning Town, have the highest levels of people aged 0-24. The GLA's Interim 2015-based population projections indicate that the greatest gains in numbers of young people under 15 (since the 2011 Census) are in Green Street, Canning Town and Custom House, and East Ham, with somewhat smaller gains in all other areas. The 15-24 years population has conversely seen a decline in Green Street, Stratford and West Ham, and Manor Park in particular, followed by Forest Gate, East Ham, Plaistow and Royal Docks. This decline is driven mostly by those over 18 years which is likely a reflection of the increased pursuit of NVQ4 and above qualifications among Newham's population (whereby that age group moves away for education purposes). The proportion of younger people within Newham's BAME population is larger than that within overall population, making up 78.9% of the total numbers under 25 years³³. Within BAME group itself, 42.8% are aged under 25.
- 3.14 Income Deprivation Affecting Children Index (IDACI) scores from 2010 put the proportion of children in Newham living in income-deprived households at 47.7%; much higher compared to the London average of 31.9%. More recent IDACI figures from 2015 (based on 2012 data) are more encouraging, with 28.8% of children in Newham living in income deprived households; however, this proportion remains higher compared to the London average of 24.1%. Areas in East Ham/Wall End, Green Street West and Forest Gate North show under 15% of children experiencing income deprivation. In the Southeast high deprivation (above 30%) is seen in Beckton and in the East of the East Ham South ward – Figure 9. These areas are surrounded by lower prevalence of income deprivation; however, parts here contain large expanses of non-residential land use. The latest findings from the Newham Household Panel Surveys indicated that 51% of children lived in households earning below average income, rising to 65% after housing costs³⁴; this compares to 2013 surveys that found 55% children lived in households earning below average income before housing costs.³⁵ While comparison between the local surveys and IDACI results is not straightforward³⁶, both indicate a slight improvement over the years.

³² ONS, Census 2011 Population by age group and ward

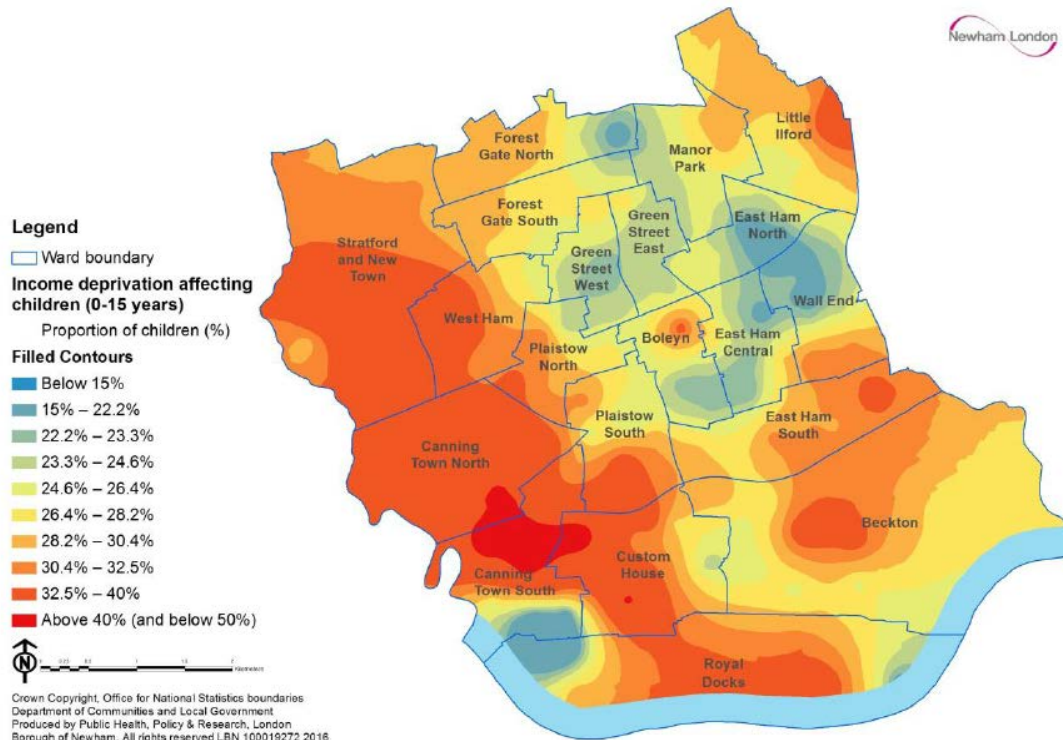
³³ ONS, Census 2011 Ethnic group by age

³⁴ LBN (2016), Understanding Newham 2015: Findings from Wave 8 of the Newham Household Panel Surveys

³⁵ LBN (2014), Understanding Newham 2013: Newham Household Panel Survey, Wave 7 Survey Findings

³⁶ The survey and official national statistics utilise same definition of child poverty, but draw on different data samples (population surveys vs. DWP and HMRC data).

Figure 9: IMD 2015, Income Deprivation Affecting Children, heat map



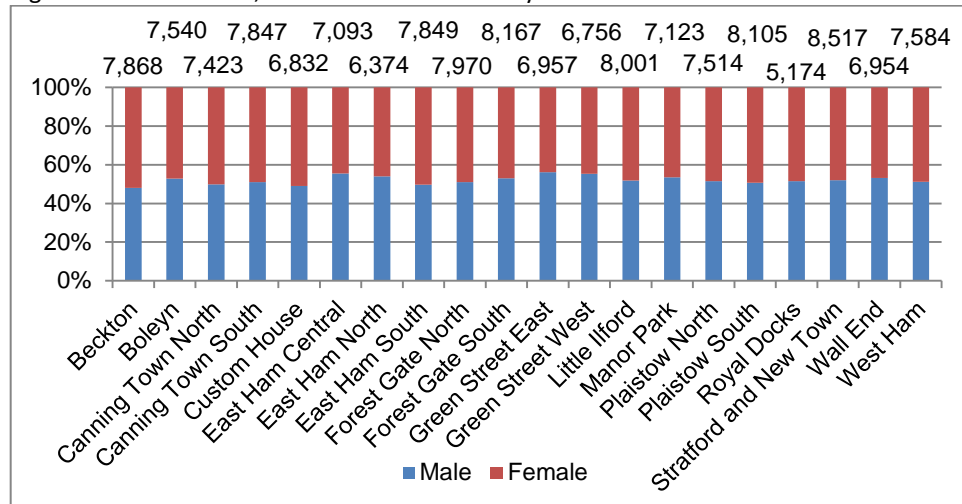
Source: LBN, Children and Young People JSNA 2016

Women, including lone parents, and those who take on the majority of childcare and home-making

- 3.15 According to the latest GLA analysis of Census 2011 data (2015), the female population is generally evenly distributed among the wards, with slightly higher proportions of females to males in Beckton, Custom House, East Ham South and Plaistow South wards – Figure 10 overleaf. This data also suggests that there are greater numbers of females amongst BAME (particularly Indian, Bangladeshi and Black/African women populations)³⁷ – Figure 11 overleaf.
- 3.16 The 2011 Census identified lone parents were present at highest levels in Canning Town and Custom House, Beckton, and Plaistow, reflecting the correlation between lone parents and female population concentrations in Beckton and Plaistow as well as the higher proportions of social housing in Canning Town and Custom House.

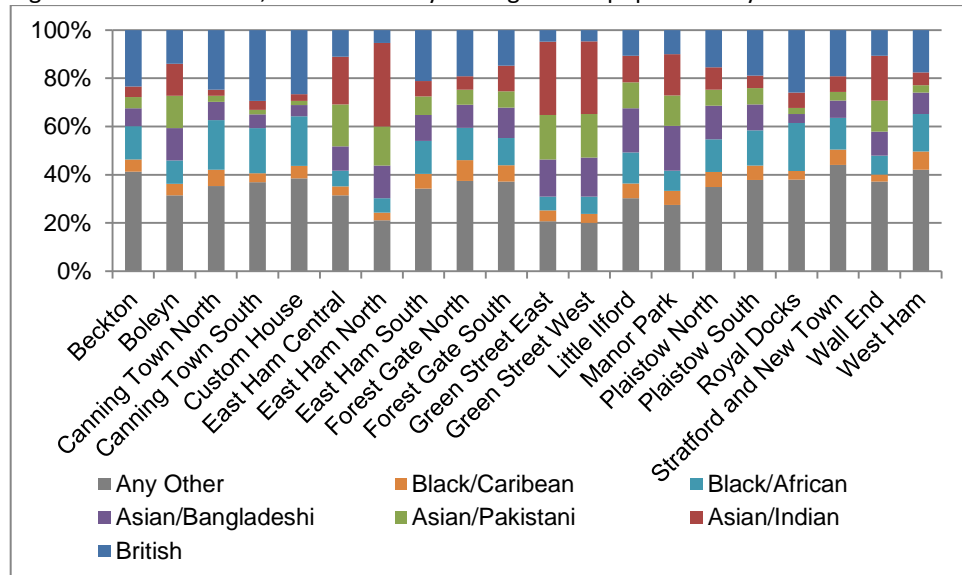
³⁷ GLA (2015), Age by detailed ethnic group by sex for London wards, based on 2011 Census data

Figure 10: Census 2011, Female to Male ratios by ward



Source: GLA (2015) Age by detailed ethnic group by sex for London wards

Figure 11: Census 2011, Ethnic diversity among female population by ward



Source: GLA (2015) Age by detailed ethnic group by sex for London wards

LGBT people

3.17 There is no data available on the spatial distribution of lesbian, gay, bisexual, and transgender people in the borough, and there are no obvious places of congregation of such groups equivalent to those elsewhere in London. However, it is important to recognise that the actual extent of the LGBT population is likely to be larger than recorded by the census co-habitation and civil partnership data, not least because people are more likely in some ethnic and faith groups prominent in Newham to hide their sexuality from friends and family, but also as cohabitation/ relationship status does not provide an accurate indication of sexual orientation or gender identity.

4 Issues and Aspirations Relevant to Spatial Planning in Newham by Equalities Group

Deprivation, Regeneration and Equalities Groups

- 4.1 Given the remaining high levels of deprivation in Newham, and the well-established fact that many people who fall within one or more equalities group suffer from multiple deprivations due to a complex web of causal factors (MoL, 2007) impact on socio-economic inequality and deprivation is discussed here first as an over-arching issue.
- 4.2 In response, on the one hand, it is reasonable to expect that everyone will benefit to some extent from area-based improvements to job opportunities, environmental quality, housing choice and quality, crime prevention, community facilities etc. This is the Newham-wide 'regeneration' that the Council and its partners wish to achieve through spatial planning, addressing reinforcing spirals of decline to help to achieve 'convergence' with the rest of London. A wide 'catch-all' mechanism of this type is the well-established justification for area-based regeneration interventions as opposed to individualised interventions in deprivation that can get overly complex to administer. Indeed, to a large extent, engagement with different equalities groups suggests their main concerns are shared with the wider population: crime, grime, anti-social behaviour, jobs for local people, affordable housing and family housing and convenient and good quality facilities, although priorities may vary from group to group.
- 4.3 Conversely, multiple deprivation as experienced by equalities groups means that we need to take extra care to ensure people are not further disadvantaged through planning and development, and if possible, to tackle particular barriers to opportunity through carefully directed spatial investment . This will partly be done through appropriate social, economic and environmental impact assessment. Whilst ostensibly, this is at the heart of the British planning system of nationalised development rights which seeks to ensure that development occurs 'for the public good' weighing up costs and benefits, it is well known that some impacts/effects can be unevenly distributed socially and geographically. This is variously described by concepts such as environmental injustice, the failure of 'trickle down', and social exclusion and injustice. As such, sustainability appraisal, the key policy testing tool here, needs to be undertaken in the knowledge of these potentially distinctive or uneven impacts. The other concern will be to ensure that particular needs, where appropriate within the context of community cohesion, can be met (directly or indirectly) and aspirations addressed.

- 4.4 Therefore the two foci of the remainder of this section are the specific or priority needs and aspirations of, plus potential distinctive or uneven impacts on particular equalities groups. This analysis is concluded by identifying the key equalities challenges for the Local Plan, and with a summary table which lists checkpoints relating to particular themes that need to be reflected in planning policy documents to meet equalities obligations.
- 4.5 Firstly however, a brief consideration of environmental injustice in Newham is appropriate given its relation to multiple deprivation and hence relevance to all marginalised equalities groups through this link (as discussed above) rather than groups-specific mechanisms.

Environmental Injustice in Newham

- 4.6 Newham as a whole suffers from a London-wide environmental injustice effect, whereby in being historically outside the more restrictive city boundaries, it became the disproportionately-favoured location for dirty, malodorous and noisy industry and infrastructure. In turn, this has meant historically that Newham has been a less desirable location within London, with cheaper land and rent, attracting poorer residents who are in turn less likely to complain about such land uses, despite being affected by them. As such, more deprived groups are likely to suffer more from environmental and health impacts.
- 4.7 Within Newham, this situation particularly applies to populations living in proximity to the sewerage works in the East, the airport to the South, and remnants of 'dirty industry' along the Lower Lea Valley in the West. The spatial response therefore must be to consider carefully whether any new housing is justified in close proximity to these sites, and in turn, whether any further development of this type should be allowed in these locations. Equally, particular attention to mitigation of existing impacts should be considered.

Older People, Disabled People and their Carers

- 4.8 Focus groups and ongoing engagement show considerable overlap in the particular spatial concerns of these groups: crime, fear of crime, anti-social behaviour, the availability of specialist and generally good quality housing, good quality (safe, accessible, with adequate parking) public realm and buildings, (including publicly accessible toilets, which can significantly impact the usability of spaces) healthier lifestyles, and conveniently-located facilities and services that people know about, including opportunities for socialising (some clustering of specialist housing may help with this, and make it more peaceful). The most recent NHPS showed that just over half of those with a long-term health condition or disability say they are satisfied with their life (55%, compared to 81% of those without a long-term health condition of

disability). Levels of social interaction are also lower among disabled residents, with 22% stating they socialise outside their household less than once a month, compared to 6% of those without disability and 12% of people over 65 years. Top three monthly leisure activities cited by disabled residents and those with limiting health conditions include visiting parks (27% and 28% respectively), eating out (17% and 23% respectively), and going to community events or gatherings (15% of disabled) or visiting libraries (11% of those with a health condition). Older people over 65 years also cite visiting parks (27%), eating out (23%) and using libraries (11%) as part of their monthly leisure activities. This corresponds to what the literature suggests, – that we need to be sensitive in relation to these groups – further pointing out the value of quality public realm and open space in enhancing people’s mental health and well-being, and improving urban realm accessibility and legibility, particularly for those with learning disabilities.

4.9 Disabled people also have lower household incomes than other residents. According to the 2015 NHPS³⁸, the median net equalised household income of disabled residents is £11,641 before housing costs and £9,519 after. By contrast, residents who are not disabled have a median household income of £16,298 before housing costs and £11,916 after housing costs. This reflects corresponding statistics showing that only 52% of those who identified themselves as disabled and in work are in full-time employment, compared to 70% of those with limiting health conditions and 84% who reported no disability or condition. Conversely, utility and food bills have a greater impact on people who consider themselves to be disabled. The median proportion of household income accounted for by bills is 36% among those residents who consider themselves to have a disability, compared with only 26% among people who do not consider themselves to have a disability. The latest NHPS also indicated that disabled people and those with limiting health conditions are also more likely to be living in social rented accommodation (62% and 65% respectively, compared to 31% of those without long term condition or disability). Residents with limiting health conditions are more likely to be dissatisfied with their accommodation (25%), compared to both disabled (7%) and those without a health condition or disability (11%).

4.10 Quality, inclusive housing that is more energy efficient, more accessible and visible community infrastructure, investment in health centres and social care, improvements to the public realm and town centres, and increased job opportunities including support for intermediary mechanisms such as Workplace, continue to be relevant development-linked responses supporting these groups.

³⁸ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

Ethnic groups, (other than gypsy travellers) recently arrived migrants and asylum seekers

- 4.11 Newham is unusual in the extent of its non-white British population, and relatively high levels of community cohesion reported³⁹. As such, Black and Asian people, as well as White British people tend to be well represented in mainstream consultation events, including focus groups and surveys that are deliberately recruited to on a stratified basis. As a result, we can largely assume that the priorities expressed through these – namely crime and anti-social behaviour, public-realm environmental improvements, affordable and family housing and improved job opportunities are also those that would make most difference to Black and Asian groups as well as the white-British population.
- 4.12 Nonetheless, consumer survey work⁴⁰ highlights the importance of specialist ethnic retail provision in many of the borough's town and local centres and elsewhere, and that all town centres are clearly well-used by ethnic groups. Indeed, such shops and services are commonly places of social interaction as well as meeting specific consumer needs. Many Black, Asian and people from minority ethnic backgrounds are prominent business-owners and workers⁴¹, particularly in/of smaller shops and services, though in some cases, recent enforcement work suggests employment conditions are poor (notably in hot food takeaways). This indicates that future changes to these centres and other shops need careful consideration in relation to potential impacts on BAME groups, seeking to maintain an adequate range of affordable, smaller shop units and where appropriate, market stalls.
- 4.13 The 2011 Census showed Asian British households were least likely to be represented by a single person (only 13.1%, compared to 26.1% overall) or lone parent (only 8.3%, compared to 14.7% overall), instead representing 51.7% of married households (with a further 27.4% represented by White British). Conversely, lone parent households are dominated by Black British (38.8%) and White British (34.3%). Finally, of the 26.1% of households represented by single persons, over half (52.4%) are formed by White British.

³⁹ Local surveys indicate more Newham residents tend to think people in their local area get on well together (85% in 2015/16) than the national or London averages (80% and 84% respectively in 2015/16), an ongoing trend that does not seem to be affected by equality characteristics. Sources: LBN (2017), Newham Survey 2016; DCMS (2017), Community Life Survey, England 2016 to 2017 (online/paper estimates for England and London)

⁴⁰ As part of the Retail and Town Centre Study 2009 and 2016

⁴¹ Annual Population Survey 2016/17 (Nomis) found that of over 16 year olds employed as sales and consumer staff 86.9%, are from BAME groups, compared to 54.9% in London overall, and men particularly represent this difference in trend compared to London and national levels (13% of men in Newham are employed in sales and customer services, compared to 5% both nationally and London overall)

4.14 The Census data (2011) identified that overcrowded households are more prevalent among BAME groups (particularly Bangladeshi and Black African people). Recent local and national surveys⁴² confirm further disparity along race and ethnicity lines, indicating that Bangladeshi and Black African people are least likely to own their home, with Black African, Black Caribbean, and Mixed groups being more reliant on social housing than overall figures. The White British population is more likely to report satisfaction with their accommodation (92%) compared to Asian Pakistani and Asian Bangladeshi (74%), Black African (66%), and Other (69%)⁴³; those of Black African and Mixed ethnicities are most likely to be dissatisfied with their home (25% and 19% respectively). Shortage of space is reported by 22% of Asian Pakistani and Asian Bangladeshi, 27% of Black African, 28% of Black Caribbean and 29% of Other ethnicity, compared to 13% of White British. Residents of Other ethnicity groups are also most likely to report being affected by pollution, grime or other environmental problems caused by industry or traffic (31%) as well as structural dampness in the home (35% of Mixed, 29% of Bangladeshi, 27% of Black African residents).

4.15 Further statistics report lower rates of employment and higher rates of (full) unemployment amongst BAME groups in Newham as compared to the borough average⁴⁴, particularly among women (see section below regarding women and the correlation with lone parenthood and majority responsibility for childcare and home-making) Working age residents of Pakistani/Bangladeshi, Black/Black British and Indian background are more likely to be economically inactive (39.6%, 35.8% and 31% respectively, compared with 27% of residents overall). Again, in line with overall trends, this prevalence is higher among women. Jobseekers allowance statistics indicate that young (18-24 years) BAME people are three times as likely to be claiming this benefit compared to young people of white background, but race/ethnicity disparity disappears when looking at duration of claims.⁴⁵ This fits with wider literature that refers to the need to pay particular attention to and address discrimination in the job market, and issues of multiple deprivation discussed above, whilst also promoting community cohesion. As such employment interventions such as Workplace are likely to be particularly important, as well as overall increasing job opportunities and training, and promoting general community cohesion and integration to break down barriers.

⁴² Cabinet Office (2017), Race Disparity Audit; LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁴³ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁴⁴ 61.2% of working age BAME residents are in employment and 7.4% are unemployed, compared with 68.7% and 5.9% respectively for Newham overall. In London, 65.9% of BAME are employed and 8.7 are unemployed. Source: Nomis (2017), Annual Population Survey 2016/17

⁴⁵ Nomis, Jobseeker's Allowance stocks and flows by ethnicity, age and duration

- 4.16 2015 NHPS results showed roughly half of the population (across all ethnicity groups) earned less than the London Living Wage⁴⁶, compared to 2013 when three-fifths of Asian residents and only two-fifths of White and Black residents reported the same⁴⁷. Within white population groups further disparity can be seen, with only 36% of White British people earning below the London Living Wage compared to a rate of 60% among White Non-British residents. The 2015 NHPS also found that Black Caribbean, Black African and Asian Pakistani groups are more likely to be working within the borough than overall population figures. Providing more quality, affordable housing that reduces fuel and other running costs will also therefore be a relevant spatial intervention, as well as providing more local jobs and upskilling opportunities.
- 4.17 National studies have shown that ethnicity is an established determinant of health inequality, with BAME groups more likely to describe their health as fair, poor or very poor. The Latest NHPS shows that physical disability is predominantly affecting Black Caribbean (31%) and White British (18%) groups while mental health appears to be more of an issue in Asian Pakistani (10%) and Black Caribbean (8%) groups.⁴⁸ The healthy urban planning literature suggests that open space, and natural green space may be particularly important to bring relief to many conditions. In addition, Local Plan engagement and development management case work has indicated the demand for community spaces from small, often minority-community groups, affected both by the lack of affordable new space and by access to appropriate community facilities. This suggests the importance of continuing to facilitate multiple use and flexible re-use of premises, as discussed further below in relation to places of worship.
- 4.18 Lastly, in relation to recently-arrived migrants and asylum seekers, issues of temporary and affordable housing, access to healthcare and cheap transport are reported in the literature to be particularly acute. It is also possible to envisage that informal social opportunities in public spaces and awareness of community facilities will also be important to this group.

⁴⁶ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel

⁴⁷ LBN (2014), Understanding Newham 2013 Findings from Wave 7 of the Newham Household Panel

⁴⁸ LBN, NCCG (2017), Joint Strategic Needs Assessment 2017-19– In the UK, Black British people are 30% more likely than white people to describe their health as fair, poor or very poor, while Pakistani and Bangladeshi people, who generally have worse health than all other ethnic groups, are 50% more likely than White British to report fair, poor or very poor health.

Gypsy-Travellers

- 4.19 Newham has one public Gypsy-Traveller site, Parkway Crescent, comprising 15 pitches with no vacancy and limited pitch turnover. Engagement undertaken by GTAA consultants⁴⁹ ORS in October 2015 identified 41 persons of Romany Gypsy origin living at Parkway Crescent, comprising 21 adults and 20 children and teenagers aged under 18, the majority of whom are long-term residents that has been tenants on the previous site, relocated as a result of the development of the Olympic Park. There were no obvious signs of over-crowding on the pitches, and whilst the majority said that they lived on the site because there was no other option, rather than through choice, all of the households were satisfied with the site due to its location in relation to work, family, friends, schools and other local facilities.
- 4.20 It is worth noting that while 2011 Census data showed only 462 Newham residents identified as gypsy or traveller, the Council's own engagement work in preparation of the Gypsy & Traveller Accommodation Assessment (GTAA) shows there may be as many as 3000-5000 Roma 'gypsies' living in Newham, albeit in houses or flats.
- 4.21 Whilst none of the gypsy and traveller families identified in Newham fall under the definition of PPTS 2015 (i.e. those that travel for work purposes), Roma Gypsies and Irish and Scottish Travellers may be able to demonstrate a cultural need and right to a caravan site under the Equalities Act (2010) and case law associated with the Human Rights Act. Furthermore, provisions set out in the Housing and Planning Act (2016) includes a duty for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.
- 4.22 National guidance providing further detail on this duty is currently in draft, however it is anticipated that following its final publication the Council will undertake such a study. In the meantime, engagement with local Gypsies and Travellers and the London Gypsy Traveller Unit highlights the likelihood of there being a housing need for these groups going forward due to children coming of age and present unmet preferences (Gypsies and Travellers housed in bricks and mortar accommodation). There is also likely to be need for affordable housing, again requiring appropriate policies to address housing mix and choice, responsive to commissioning requirements.

⁴⁹ LBN Gypsy and Traveller Accommodation Assessment (2016)

People of faith

- 4.23 Engagement with faith groups and umbrella third sector organisations that work with faith groups suggests that whilst some traditional places of worship and other potential worship space is under-used (such as some smaller independent community centres) quite a lot of Newham's faith infrastructure is at capacity. They report that many groups are already sharing worship space to the extent that it may be limiting their frequency of worship, linked community activities and so on. Council-run community centres are also frequently used by faith groups as places of worship on weekends. This is also evident by our contact with faith groups through the development management process, which sees a steady flow of applications for new worship and associated community facilities, often in inappropriate locations where loss of employment space would be involved, and access by means other than private car would be less convenient. Equally, it is clear that many faith groups in London travel some distance to worship – faith communities are not necessarily geographically-constrained as they once were, and congregations can be very large. However, we also know that some spaces (e.g. schools, traditional church buildings, some community centres not in council ownership) could be more intensively used by the community, including particular faith groups.
- 4.24 In line with the corporate community cohesion and sustainable communities approach, this suggests the need for a continued emphasis on multi-use, flexible facilities/spaces in accessible locations, (applied to both new and existing facilities/spaces) and facilitation of inter-faith/inter-congregation working to make co-ownership, -use and -development possible to meet local needs. This is particularly relevant given the diversity of faith (and non-faith) groups in Newham, and that the use of worship space tends to be highly cyclical, with peaks and troughs according to worship cycles and religious calendars. Facilitating access to places of worship elsewhere through improved cross-boundary connectivity may also be important, together with clear guidance to proponents of new, perhaps larger facilities as to where and in what form they are likely to be acceptable, where they address local needs. Again, in line with the corporate cohesion and sustainable communities approach, this will be about ensuring that such facilities are integrated (through their design and functioning/management) into the urban fabric, with minimal impact on residential amenity or employment potential, and easy access by non-car means.
- 4.25 Some faith groups have a particular burial need requirements Jewish, Muslim, Buddhist and Roman Catholic communities; although Zoroastrian and Hindu religions also have burial requirements⁵⁰. However, Table 2.4 of the 2010 London Burial Provision Audit, summarises Newham's capacity status as '5 -

⁵⁰ GLA (2014), Assessment of the GLA'S impact on faith equality

SUSTAINABLE: Grave re-use in the borough has extended capacity of an existing cemetery infinitely⁵¹

- 4.26 The literature also draws our attention to the fact that some groups, perhaps because of their distinctive clothing or other aspects of appearance may live in fear of intimidation and crime due to religious intolerance. As London continues to deal with terror related threats including right-wing activism, the Muslim community, and in particular women, have reported an increased fear of hate crime⁵². Overall, crime and anti-social behaviour is the second most important issue reported by 39% of residents in the latest survey⁵³. This highlights the continued need to promote integration and cohesion, not least through opportunities for informal social contact, and discouraging segregated or specialist facilities and housing. Similarly, in spite of the Equalities Act 2010, distinctive appearances and practices may mean that some faith groups are more likely to suffer from employment discrimination, finding it difficult to access jobs, suggesting the importance of increases in job opportunities and support to access them, as well as affordable housing. Whilst the 2009 Housing Market Assessment Household Survey suggested that Muslims in particular were more dependent than other groups on social rent and intermediate housing, the 2015 NHPS indicates that Muslims and Christians are equally as likely to rent their home from the Council or a housing association/trust (36% and 37% respectively), while those of other religions were less likely (7%) and those without a religion most likely, by a small margin (43%). Home ownership is relatively equal among religious groups.
- 4.27 Faith is also a factor in some people having larger families due to religious practices. This was borne out by the 2009 Housing Market Assessment Household Survey which also found Muslims, Hindus and Sikhs were more likely to be living in overcrowded conditions. The 2016 NHPS⁵⁴ indicated that a lack of space is the main problem with accommodation for all religious groups though the proportion of people reporting it as an issue is higher among certain groups (reported at a rate of 30% for Muslim people compared to only 12-17% of Christian and non-religious residents) – this correlates to the average family size disparity among such groups. Lastly, access to specialist shops and services will be important to certain groups (e.g. halal butchers and specialist food stores).

⁵¹ University of York (2010), An Audit of London Burial Provision, page 18

⁵² In 2015, half of Muslims worried about becoming a victim of crime, compared to a third of Christians and people other religions, as reported by the Newham Household Panel Survey wave 8 (2016). More recent Council engagement has indicated a further rise in fear of crime from the Muslim community following increased hate crime and recent terror activity.

⁵³ LBN (2017), Newham Survey 2016

⁵⁴ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

Younger People

- 4.28 Younger people in Newham express⁵⁵ concerns both about the need for better facilities for themselves (including open spaces such as Central Park and the Greenway) and wider issues that affect them and their families such as the need for more and better employment opportunities, affordable housing, family-sized housing, health facilities, local facilities rather than everything being concentrated in areas such as the Olympic Park, clean streets, and the general need to make the area somewhere to be proud of, where people feel safe and un-intimidated. Homelessness affecting 16-24 year olds in Newham is higher than the London rate (1.34 per 1000 population, compared to 0.92 in London overall and 0.58 in England, in 2015/16), as is homelessness affecting families (10.0 per 1000 households compared to 4.5 London rate).⁵⁶ Public Health England⁵⁷ data estimates that in 2015 10.5% of those aged 5 to 16 suffered from a mental health disorder while 4.1% suffered from emotional disorders, compared to 9.3% and 3.6% respectively in London (and 9.2% and 3.6% in England). Further, the 'What About Youth' survey of 15 year olds in schools in 2014/15 identified that 48.9% reported being bullied, below London average of 50%; while 14% reported having bullied others (above the London average of 11%). While gang crime continues to be an issue identified by youth groups, the rate of first time entrants to the youth justice system has been decreasing and is now below the London average.⁵⁸ Young people's top three weekly leisure activities include visiting parks (42%), eating out (36%) and using leisure centres (21%), while visiting libraries is also an important monthly activity (15%). As expected, youth tend to socialise often, with a third meeting friends or relatives outside their household on most days, and 54% at least once on a weekly basis.
- 4.29 Longer term, engagement work and national surveys have also indicated that there is concern from young people that they would be priced out, or crowded out by change, but also ambition to continue into higher education and professions. The Latest NHPS showed that unemployment is a particular problem among residents aged 16 to 24 who are not in education or training (19%, compared to 10% of residents overall)⁵⁹. However, ONS data since April 2016 indicates that young people aged 18 to 24 are now less likely than working age residents to be claiming Jobseekers Allowance, in line with London trends⁶⁰. The rate of 16-18 year olds not in education, employment or

⁵⁵ Local Plan Engagement Evidence Base

⁵⁶ Public Health England, 'Young People'

⁵⁷ Public Health England, 'Young People' and 'Children and Young People's Mental Health and Wellbeing' data sets

⁵⁸ Form 1,033 per 100,000 population in 2011 (982 for London), to 364 in 2016 (407 for London). Source: Public Health England, 'Young People'

⁵⁹ LBN (2016), Newham Survey 2016

⁶⁰ The claim rate for 18 to 24 year olds has dropped from 8.0 in January 2012 to 0.9 in January 2017. At the same time, overall claim rates for working age population in Newham have dropped from 5.2 to 1.4. Source: Nomis, Jobseeker's Allowance by age and duration with proportions

training has also been decreasing, from 4.6% in 2011 to 3.4% in 2015, but remains above London average (3.1% in 2015). Lack of jobs is one of the top local and national issues identified by 16 to 24 year olds. As recorded through the latest NHPS, of the 36% of residents 16 to 24 years old who are in paid employment, 4% reported zero hours contracts, compared to 2% of 25 to 34 year olds and none among older 35+ groups. Younger residents are also much more likely to be in temporary or agency work (7% compared to 1-2% for other age groups). Youth are disproportionately employed in the retail, wholesale and personal services sector (46%, compared to roughly 20% of other age groups), and predominantly in medium companies of 10 to 50 employees (53%)⁶¹ Youth are also the dominant group of private renters (71% of 16 to 24 year olds compared to 34% overall)⁶², typically paying a monthly rent of between £200-£400 (934%) or £300-£600 (39%), indicating that the majority would be renting a room in a home in multiple occupation⁶³.

- 4.30 Engagement work also indicated that compared with other groups, young people are more aware of, and concerned about, sustainability and climate change, and enthusiastic proponents of choice, contemporary design and innovative solutions such as mobile facilities, high quality design allowing less compatible uses to reside side by side, and re-use of buildings.
- 4.31 These issues and concerns translate into the relevance of designing inclusive public spaces for informal interaction, support for employment intermediaries such as Workplace, as well as new affordable family housing, more and better job opportunities, reviews of infrastructure provision and overall better, more secure and environmentally-sensitive design.
- 4.32 Beyond this, the literature advises sensitivity to the need for safe independent travel, open spaces that are not excessively managed to enable imaginative play, better air quality and environments that help to promote healthy lifestyles, and sufficient affordable childcare. It also reminds us that child poverty is a significant issue in London.

⁶¹ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁶² And only 7% own their own home. Source: LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁶³ Nevertheless, the 2015 NHPS also indicates that youth tend to be stable residents, with only 21% having lived at their current address for two years or less. Source: LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

Women including lone parents and those that take on the majority of child-care and home-making

- 4.33 On the basis of the limited amount of information we have as to distinct gender-based priorities and preferences⁶⁴, women engaged with in Newham generally seem more conscious of and concerned about family-oriented issues, including the availability of family housing, affordable housing, and opportunities for themselves and their children - social, educational and employment-based. As with other groups, women are also concerned about crime and anti-social behaviour⁶⁵, and the usability of public space – affected by for instance, provision of publically accessible toilets.
- 4.34 Importantly, official ONS statistics indicate that working age women in Newham are more likely than the London average to be economically inactive – although this has been improving – and when in employment, to work fewer hours than men⁶⁶. This is supported by the NHPS⁶⁷ which indicates that only half of women were in paid employment in 2015, compared to 68% of men. Economic inactivity is particularly prevalent among women of Pakistani, Bangladeshi and Indian ethnicity.⁶⁸ Families with dependent children are more likely to have only one parent working (65.4% compared to 45.2% in London), than to have both parents working (25.6% compared to 44.0% in London)⁶⁹. Conversely, the Census 2011 showed that women constituting lone parent households with dependent children are less likely to be in employment than male lone parent households⁷⁰. Women are more likely to work locally and make use of nursery, breakfast clubs, after school clubs and holiday schemes⁷¹, clarifying that access to local jobs and childcare services are particularly important to this user group.

⁶⁴ Engagement Evidence Base

⁶⁵ In 2015, 47% of women were at least fairly worried about crime, compared to 39% of men, Source: LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁶⁶ In 2016/17, 38.2% of working age women in Newham were economically inactive, as opposed to 28% in London as a whole, but this is an improvement on the 46.9% in 2011/2012. However, economic inactivity is highest among ethnic minority women, at 43.1%. Only 14.6% of female Newham residents work more than 45 hours a week compared to 24.4% for male residents. 25.9% of working female residents in Newham work part-time, compared to 14.6% of men. Source, Nomis, Annual Population Surveys

⁶⁷ LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁶⁸ In 2016/17 69% of Pakistani/Bangladeshi women were economically inactive, followed by 44% of Indian women and 33% of Black/Black British women, compared with 21% of white women. Similarly, 27% of mixed ethnicity women are not economically active. Source: Nomis, Annual Population Survey 2016/17

⁶⁹ Nomis, Annual Population Survey 2016; The data also shows that of all Newham households in 2016, only 46.9% were working households (all adults in the household) while 43.9% had a single breadwinner, compared to 54.0% and 33.3% respectively for London.

⁷⁰ Only 23.3% were in full time employment and 26.5% in part time employment, compared to 39.3% and 20.4% respectively of male lone parent households.

⁷¹ 39% of borough's employed women work in Newham, compared to 20% of employed men; 15% of women report use nurseries as childcare arrangements, compared to 8% of men; 8% of women use

- 4.35 The 2016/17 Annual Population Survey indicates that 10.2% of Newham’s residents in employment are working in managerial, director and senior official roles, which is 2% below the London average. However, only a quarter (24.5%) of Newham’s managers, directors and senior officials are women, compared to a third of London’s overall (32.3%). Of the 16.3% residents employed in professional occupations, over half are women (55.8%), above the London average of 46.5%. Women also make up 88% of residents employed in leisure, caring and service occupations.
- 4.36 Median gross weekly earnings for women in 2016 have been recorded as £489.0 for full time workers and £160.8 for part-time workers, compared to the £557.8 and £175.8 respectively for men – a pay gap of 12.3% among full-timers and 8.5% among part-timers⁷². When considering the 20% highest earnings percentile, women in full time employment earned £664.2 per week compared to £790.5 for men, a gap of 15.9%. Therefore, pay inequality is less pronounced amongst lower paid employees and rises with earnings percentiles. While women across London generally earn more than those in Newham (median gross weekly pay of £584.8 for full time and £190.6 for part-time), gender pay inequality among full time workers follows city-wide trends⁷³. Recent Council surveys show that women, regardless of ethnicity, are more likely to earn below the London Living Wage⁷⁴ than men. All these statistics suggest that households where women are the sole earners, and particularly lone parent households, are most likely to be deprived.
- 4.37 Along these lines, the literature draws our attention to the significance in most women’s lives of good, safe public transport, walking and cycling; access to natural green space and good quality housing; clusters of good quality local services; affordable childcare facilities; and opportunities for informal interaction with others to socialise outside the home, particularly for women who are the main carers and home-makers. Likewise, women may also benefit from targeted support to access job opportunities and training.

breakfast clubs, after school clubs, or holiday schemes, compared to 2% of men. Source: LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Surveys

⁷² Nomis, Annual Survey of Hours and Earnings 2016 - resident analysis

⁷³ At median gross weekly pay level, women in London in full time employment earn 13.4% less than men, but women in part time employment earn 10.6% more than man. Among the top 20% earners, women in full time employment earn 18.9% less than men, but women in part time employment earn 13.2% more than men. Source: Nomis, Annual Survey of Hours and Earnings 2016 - resident analysis

⁷⁴ Just 35% of White women, 33% of Asian women and 41% of Black women earned above the London Living Wage in 2015, compared to 62% of White men and 50% of BAME men. Source: LBN (2016), Understanding Newham 2015 Findings from Wave 8 of the Newham Household Panel Survey

LGBT people

- 4.38 Focus group work undertaken in 2005 found that LGBT people did not have any specific concerns relating to the expression of sexuality in Newham, although they welcomed an overt presence and acknowledgement of their community as part of the wider community events. Some homophobia was reported, but this was frequently indistinguishable from other hate crime and other threatening behaviour from certain groups, and as with many people, this affects feelings of safety in certain areas/parks. Promotion of community safety and community cohesion were therefore an area of importance highlighted. Given that impacts of sexuality and gender identity are often not revealed, and may be disproportionately revealed among different populations groups (according to age, race, or religion for example), how the experiences of LGBT people in the borough compares to overall trends is difficult to quantify.
- 4.39 Backing up what action group and service providers had told us about patterns of service access, LGBT people were largely happy to access more specialist services and social facilities in other boroughs, notably Waltham Forest and Tower Hamlets, and may choose to do so due to concerns about being 'outed' in their own community. This suggests good cross-borough connections to the north and west may be particularly important to this group.
- 4.40 Action groups also suggest that homelessness in LGBT populations is on the rise, particularly amongst younger people in BME groups, due to problems with family acceptance of their sexuality, across London. Again this highlights the importance of increasing affordable housing supply.

5 Conclusions and Action Points

Conclusions and the policy formulation checklist

- 5.1 Newham is an obviously diverse borough, not only in the variety of faces that can be seen here, the languages that can be heard, the cooking smells smelt, but also in terms of its cultural landscape, which includes a diversity of places of worship, shops and services. In many respects therefore, planning and development can be seen to respond well to diversity already. Recent economic migration from Eastern Europe for instance is already reflected in shops and social spaces. However, in reality, diversity represents an ongoing management challenge within the urban environment and within planning as part of this. Failure to explicitly acknowledge it, and the less obvious associated potential equalities issues, would be to risk the disintegration of social cohesion, disruption of the opportunities for people to achieve their potential, and the ability to make Newham a better place.
- 5.2 Generally we can see that in response to an explicit acknowledgement of the need to manage diversity and an analysis of the potential equalities issues by equality group, the key spatial interventions in addition to regeneration that are indicated are of 4 types:
1. Regulatory – to prevent disproportionate harm; [Red]
 2. Provision (or enablement of provision) for specific needs where appropriate within a cohesion agenda; [Yellow]
 3. Provision for mechanisms to access mainstream opportunities; [Blue] and
 4. Priorities within general themes that will particularly benefit equalities groups as well as the wider population [Green].

These relate to the various legislative duties which seek to manage distributional effects (uneven outcomes), prevent discrimination and ensure equality of opportunity, social inclusion and cohesion.

- 5.3 From the analysis above, a series of checkpoints has been distilled for the Local Plan, to be applied in the formulation of policy and guidance. These can be seen in the matrix used in Chapter 6, with the colour coding linking back to the type of intervention above as indicated. [In some cases categories overlap; where this is the case the text is one colour and the shading the other, with the shading being the more significant]
- 5.4 In general, all equalities groups, along with the wider population should benefit from the interventions suggested, and many are easy to incorporate into a planning system that already embraces them for other reasons. Nonetheless, a number of challenges can be anticipated, notably:
- a. Balancing the desire for exclusive facilities for faith reasons, with the widely accepted view that community cohesion is best fostered

through different groups coming into contact with each other on a daily, informal basis, rather than allowing for complete segregation.

- b. Promoting environmental justice in the context of well-established patterns of land-use, such that there is the need for retrospective mitigation and it usually makes sense to place further similar uses in the same, generally relatively low-populated area, rather than spread the impact further.
 - c. Responding to changing diversity – Newham’s population is ever-changing, and though we may aim to make it more stable, its historic associations and place in London, together with wider cultural and demographic patterns mean that equalities issues now, may not be those of the future.
- 5.5 As with many decisions in planning, a balancing of conflicting objectives will be required, with due consideration of appropriate mitigation and in some cases, the need to step back and work to find alternative solutions – by altering the mainstream, sub-regional working and so on. In relation to problem (a), mitigation is provided for within the checkpoint that relates to faith infrastructure and in checkpoint 2 in the table; whilst cross-boundary solutions are suggested by checkpoint 3. In relation to problem (b), mitigation fall-backs are represented in checkpoints 1, 11 and 18 in the table, and cross-boundary alternatives by checkpoint 3. Thus, whilst in theory some checkpoints have more serious consequences if not responded to, in many cases these checkpoints rely on each other to achieve the best outcomes, particularly in the context of wider planning objectives that also need to be achieved.
- 5.6 Equally, in response to challenge (c) regarding changing diversity, an overriding consideration must be the need to plan for flexibility. Significantly, this will include considerations of ownership as well as adaptability, a key lesson that has been learnt from past experiences of asset transfer In Newham, which have seen the keys to important community facilities being held by people and organisations that are no longer involved in its social and community life. Fortunately this is an external test (of ‘soundness’) that the Local Plan must pass before it is adopted, so it will be reviewed as a matter of course. Monitoring and review will also be important however.
- 5.7 **Monitoring** – through the Authority Monitoring Report bulletins, which keeps policies under review, identifying areas where modification is required. Key indicators included in table overleaf.

Equalities Indicator	Source	Breakdown by groups?	AMR section
Satisfaction with the area	Newham Survey (annual)	No	Vision and Spatial Policies
Crime and fear of crime rates	GLA (annual); Newham Survey (annual); NHPS (biannual)	NHPS only	Successful Places
Perceived local area cohesion	Newham Survey (annual); NHPS (biannual)	NHPS only	Vision and Spatial Policies
Personal Resilience	Newham Survey (annual); NHPS (biannual)	NHPS only	Vision and Spatial Policies
Life Satisfaction	NHPS (biannual)	Yes	Vision and Spatial Policies
Cross-boundary connectivity improvements secured	Newham Highways & DM activity (annual)	n/a	Infrastructure
Provision of community infrastructure	DM activity (annual); LDD (annual)	n/a	Infrastructure
Inclusive access improvements	Newham Highways & DM activity (annual)	n/a	Successful Places
Satisfaction with Council's community facilities	Newham Survey (annual)	No	Infrastructure
Public realm investment projects, including cycling/walking	Newham Highways, Regeneration & DM activity (annual)	n/a	Infrastructure
Investment in existing green/open spaces, including play areas	LBN Leisure, Regeneration, & DM activity (annual)	n/a	Infrastructure
Total green space provision and deficiencies	LDD (annual), GIS mapping	n/a	Infrastructure
Area concentration of hot food takeaways and betting shops	Town Centres Survey; GIS mapping (annual)	n/a	Successful Places
Walking and cycling rates	DFT; GLA/TFL; NHPS (biannual)	NHPS only	Infrastructure
Physical activity rates	PHOF; JSNA; NHPS (biannual)	NHPS only	Successful Places
Employment and activity rates	APS/Census; NHPS (biannual)	Yes	Jobs

Equalities Indicator	Source	Breakdown by groups?	AMR section
Prevalence of earnings below London Living Wage/National Minimum Wage	APS/Census; NHPS (biannual)	APS by gender; NHPS by all groups	Jobs
Workplace outputs	Workplace (annual)	Yes	Jobs
Employment floorspace uplift	DM activity/LDD (annual)	n/a	Jobs
Satisfaction with accommodation	NHPS (biannual)	Yes	Homes & Successful Places
Delivery of affordable housing, family housing and specialist housing including gypsy-traveller pitches	Housing delivery monitoring (annual)	n/a	Homes
Housing affordability	ONS (annual); Newham Survey	n/a	Homes
Youth offending rates	PHOF (annual)	No	Successful Places
Rate of 16-18 year olds not in education, employment or training	APS/Census (annual)	No	Jobs
Children in low income families	PHOF; IMD; NHPS (biannual)	No	Jobs
Family homelessness	PHOF; DCLG (quarterly)	No	Homes

AMR = authority monitoring report, published by LBN;

APS = annual population survey, published by Office for National Statistics;

DM = development management;

LDD = London Development Database

NHPS = Newham Household Panel Survey, published by LBN;

PHOF = Public Health Outcomes Framework, published by Public Health England;

5.8 Ongoing engagement

- With all equalities groups through the Council's mainstream research programme, and meeting with organizations' leaders where appropriate, particularly regarding housing and infrastructure needs, but also to help to review issues and needs as presently scoped, including issues that are less easily monitored by standard indicators e.g. visibility of community facilities, management of change.
- This will also help give more nuanced interpretations of monitoring work by equalities group, where this is not available in the statistical source.

6 Summary Checklist for consideration through the Local Plan to ensure equality of opportunity, social and environmental justice and social inclusion and cohesion

Check Point	Equalities Groups Particularly Relevant To (in most cases all groups will benefit)							Notes
	Older people, disabled people, carers	BAME people & recently arrived migrants	Gypsy-travellers	People of Faith	Young People	Women, incl. lone parents/FT home-makers	LGBT people	
1. A more robust approach to environmental impact, with greater attention to community engagement, cumulative, health and distributional effects and more stringent mitigation and separation of uses	+	+	+	+	+	+	+	Manage the transition of town centre activity from retail to culture, leisure and tourism.
2. Provision for truly public spaces/public realm (including adequate management/maintenance) and inclusive facilities	+	+	+	+	+	+	+	Includes provision of publicly-accessible toilets
3. Improvements to cross-boundary connectivity	+	+			+	+		
4. Designing out, [or re-designing to reduce] crime and fear of crime	+	+	+	+	+	+	+	

5. Clear guidance on where and how new faith infrastructure is likely to be acceptable to meet local needs, whilst also facilitating the multi-use of new and existing community infrastructure or other appropriate spaces, co-development/ownership and an understanding of the logic of a community-cohesion approach, to ensure exclusive spaces are minimised.		+		+				
6. Accessibility-based approach to infrastructure planning, ensuring all types of housing have good infrastructure access (including to green space) or at least good low cost transport connections	+	+	+	+	+	+		
7. Promotion of clustering and multi-use of community infrastructure facilities, including flexible re-use of otherwise redundant spaces	+	+		+	+	+		
8. Support for low cost transport modes	+	+	+	+	+	+		
9. Increasing and diversifying job opportunities, both in absolute terms and through local labour agreements	+	+	+	+	+	+	+	
10. Child/day care provision/enablement	+	+	+	+	+	+		
11. Higher environmental and quality (especially space) standards in housing	+	+			+	+		Important mitigation for legacy of environmental injustice
12. Support for training and employment intermediaries	+	+	+	+	+	+	+	

13. Provision for affordable housing and specialist housing needs, (including non-conventional housing and family housing) within genuinely mixed communities, securing as much mainstreaming of adaptations as possible. Some clustering of specialist housing for certain groups may be appropriate.	+	+	+	+	+	+		
14. Ensuring that publicly-accessible facilities are visible and obvious within the urban context	+	+		+	+			
15. Application of principles of healthy urban planning focused on healthy lifestyles (HIA is covered by checkpoint 1)	+	+			+	+		
16. Acknowledgement of the importance of particular locations for specialist ethnic shopping and services in planning and managing change in these locations		+		+				
17. Provision for appropriate levels of disabled persons' parking	+							
18. Consideration of targeting investment in housing and infrastructure improvements in most deprived areas	+	+	+	+	+	+	+	'Compensates' or helps retrospectively mitigate for legacy of environmental injustice

19. Acknowledgement of the importance of smaller shops as places of business, employment and social interaction for BAME groups in planning change that affects these.		+						
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References

In addition to the engagement work and statistical sources referenced above, the following documents have been consulted:

Aston Mansfield (2013), *Newham Key Statistics*, Aston Mansfield: London

CABE Design Council (2008), *Inclusion by Design* available at:
<http://www.designcouncil.org.uk/knowledge-resources/guide/inclusion-design-equality-diversity-and-built-environment> [accessed February 2017]

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<https://www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2016> [accessed February 2017]

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https://www.london.gov.uk/sites/default/files/assessment_of_the_glas_impact_on_faith_equality.pdf [accessed February 2017]

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<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/town-centres> [accessed February 2017]

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<https://www.newham.gov.uk/Documents/Health%20and%20social%20care/AdultJointStrategicNeedsAssessment.pdf> [accessed September 2017]

NHS Newham / LB Newham (2016), *Children and Young People's Joint Strategic Needs Assessment 2016-2018* available at:
<https://www.newham.gov.uk/Documents/Health%20and%20social%20care/ChildrenYoungPeopleJointStrategicNeedsAssessment2016-18.pdf> [accessed February 2017]

Local Plan Review

Habitat Regulations Assessment

Addendum to the Pre-Submission Version Integrated Impact Assessment (IIA)

February 2018

Contents

1	Introduction	3
1.1	Aims and objectives	3
1.2	The Local Plan Review	3
1.3	Regulatory basis of HRA.....	5
1.4	Stages of HRA	6
2	The European Sites.....	6
2.1	Sites of relevance	6
2.2	Lee Valley SPA / Ramsar	7
2.3	Epping Forest SAC.....	7
3	Scope and methodology.....	10
3.1	Approach to assessment.....	10
4	Likelihood of Significant Effects.....	11
4.1	Sensitivity of qualifying features in relation to plan remit	11
4.2	Traffic trends and effects.....	13
	Commuting flows between Newham and the European site	13
	Freight movements	17
4.3	Pollution dispersal and deposition from within Newham	17
4.4	Recreational patterns in Newham	19
5	Screening Assessment.....	22
5.1	Initial Screening	22
5.2	Second Screening of Local Plan policies	24
5.3	Mitigation and Safeguarding Proposals	27
5.4	Conclusion	32
6	Summary & Conclusions.....	33
	Data sources	34

1 Introduction

1.1 Aims and objectives

1.1.1 This document satisfies the requirement for Habitat Regulations Assessment (HRA) of Local Plans in accordance with Article 6 of the EC Habitats Directive 1992 (interpreted into British law by the Conservation of Habitats & Species Regulations 2010).

1.1.2 The purpose of HRA is to identify any aspects of an emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or 'European sites' (see 1.3.1 below). The assessment should look at likely effects in isolation and in combination with other plans and projects, and identify appropriate avoidance and mitigation strategies where any negative effects are identified.

1.1.3 This report comprises the Screening Assessment and has been prepared in consultation with Natural England; it is equivalent to the requirements of Stage 1 of the HRA process, following procedures set out in current European and national guidance¹.

1.2 The Local Plan Review

1.2.1 Newham's Local Plan currently comprises the 2012 Core Strategy, 2016 Detailed Sites and Policies DPD, and 2012 Joint Waste Plan. The review that is the subject of this HRA seeks to combine the Core Strategy and DSPDPD, making updates to policies and associated site allocations or designations where necessary (note the Joint Waste Plan is subject to a separate timeline of review). In this instance, 'necessary' may mean to update the plan in light of regional or national policy changes, in light of sites having been developed, in light of new opportunities and pressures, or in relation to the overall aims and strategy of Local Authority. For further explanation of the review and its purpose please refer to core documents.

1.2.2 The Local Plan is a 15 year spatial plan containing policies to guide the location, type, scale and design of new development; the plan period for the revised document will be ~2018 to 2033 (the existing Core Strategy covers 2012 to 2027). Much of the plan (it's structure, breakdown of policies, focus on issues, and nature of sites allocations or designations) remains the same as the Core Strategy and DSPDPD with minor edits to overall vision, spatial policies, and associated thematic / development management policies.

Headline changes as per associated reports to Council include:

- The allocation of 10 new mixed-use strategic sites to promote sustainable growth and the delivery of convergence;
- amendments to housing policies to inter alia update the overall housing

¹ European Commission, 2001; DEFRA, 2012; Tyldseley & Chapman, 2013

target for the borough to 43,000 homes between 2018 and 2033, and to ensure a continued supply of good quality housing of various types, sizes and tenures to meet need, attempting to maximise the benefits of development for residents by acknowledging the change in market conditions, and recognising emerging products (such as the purpose-built Private Rented Sector market);

- further promotion of economic growth, through the identification of a limited amount of employment land for release, whilst maintaining an adequate reservoir of sites and land to deliver jobs and business growth;
- consideration of new growth sectors (such as that of the cultural and night-time economy) and clearly defining the scale of ambition in terms of access to employment that developers are expected to support;
- recognition of the significant need for healthcare and education provision via the allocation of a number of sites for social infrastructure use; and
- the review of any existing allocations (both large scale strategic and non-strategic) to recognise any changes in context.

1.2.3 This HRA screening assessment is based on the Proposed Submission Draft plan published November 2017. The screening has been prepared in light of Natural England advice received during 'Regulation 19' consultation in January 2018, as such the Integrated Impact Assessment (IIA) at Scoping Assessment stage, 'Issues and Options' (Reg 18) and 'Proposed Submission' (Reg. 19) included a different handling of the HRA requirement. Natural England's advice changed in the latter stages of plan production given new internal guidance produced by them in December 2017.

1.2.4 The London Borough of Newham covers an area of 39km², and has an estimated population of 347'183 in 2018². Summary growth figures within the proposed plan include 49 thousand additional residents³, 43 thousand new homes⁴, and 60 thousand new jobs⁵. The Local Plan acknowledges that this growth has implications for infrastructure and the environment, with thematic policies addressing needs and mitigation where relevant.

1.2.5 As per the adopted plan, the revised plan retains a focus on growth within the 'Arc of Opportunity', a spatial area that recognises the industrial history of the southern and western edges of the borough with huge potential for new housing meeting a strategic need for London. The northern parts of the borough, covered by 'Urban Newham' policies, are already heavily developed with more limited scope for growth, though intensification around transport hubs is promoted.

1.2.6 The London Plan sets out development priorities and the strategic planning framework for London. It sets Borough housing targets and identifies locations of strategic importance for London's growth. While the revised Local Plan represents an increase in predicted growth compared to the adopted 2016 London Plan, it is worth

² Based on mid-2015 GLA projections as recommended

³ *ibid.*

⁴ Policy H1

⁵ 2017 LBN Employment Land Review + GLA projections

noting that the Draft London Plan published December 2017 include higher targets than the Proposed Submission Local Plan accounts for.

1.3 Regulatory basis of HRA

European Directives

1.3.1 Article 6(3) of the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna) states:

‘Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.’

1.3.2 Article 6 (4) states: ‘If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected.’

National Regulations

1.3.3 The Conservation of Habitats and Species Regulations 2010 (hereafter referred to as the ‘Habitats Regulations’) implement the provisions of the Habitats Directive in UK law. Mirroring the EU Directive, Regulation 61(1) of the Habitats Regulations states:

‘A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

must make an appropriate assessment of the implications for the site in view of that site's conservation objectives.’

1.3.4 The ‘competent authority’ in this case is the London Borough of Newham, as local planning authority.

1.4 Stages of HRA

1.4.1 As set out in guidance by the European Commission (2001), HRA requires a stage-by-stage approach; these can most simply be categorised as:

Stage 1: Determination of likely significant effect;

Stage 2: Appropriate Assessment to determine effect on site integrity;

Stage 3: Consideration of alternatives; and

Stage 4: Consideration of imperative reasons of over-riding public interest, and compensation measures.

1.4.2 This document covers Stage 1, in order to determine whether the revised Local Plan will have any previously untested likely significant effects on European sites, and whether an Appropriate Assessment is necessary.

1.4.3 As with other elements of the IIA process, HRA is ordinarily the subject of consultation throughout the plan production process; as no concerns with the Authority's approach to HRA were raised at IIA Scoping (December 2016), or Regulation 18 consultation (April 2017) that has not been the case in this instance. This updated addendum follows advice from Natural England received in January 2018, they have been consulted on production of the addendum and will have the opportunity to comment / confirm at examination. As no parties previously raised concerns regarding the handling of HRA it is not considered significant that this addendum has not been more widely consulted upon.

2 The European Sites

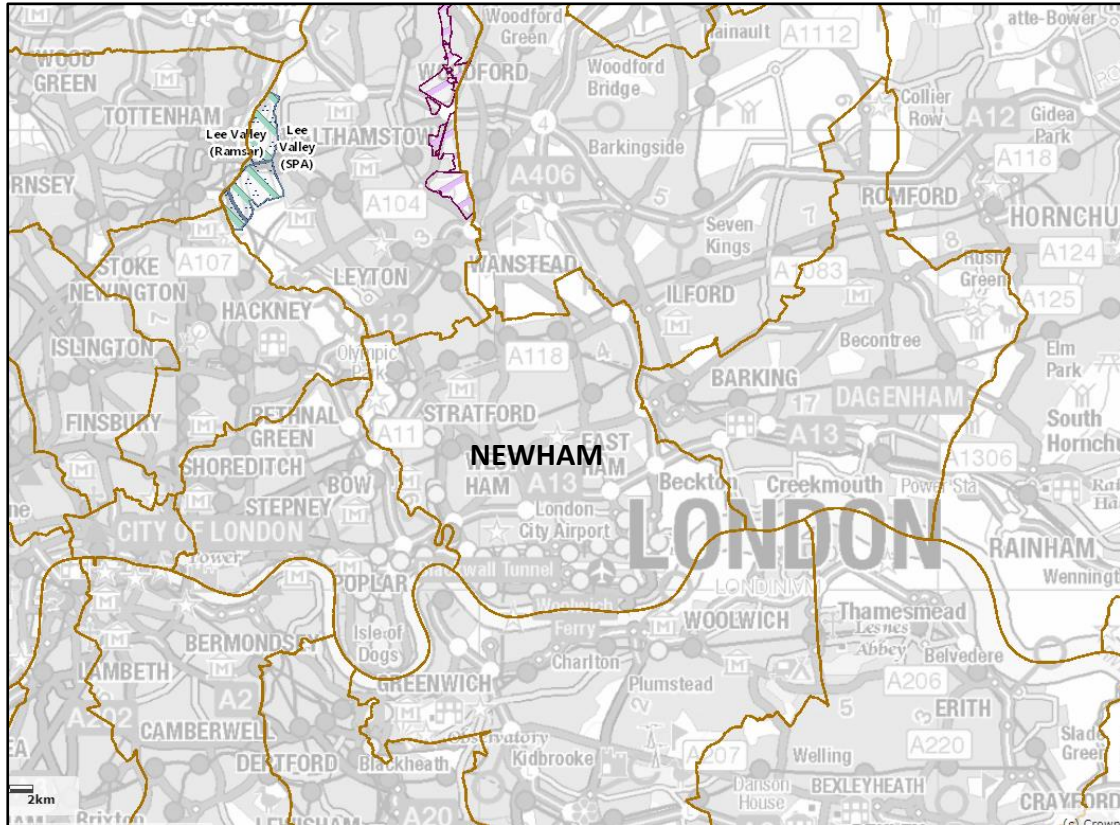
2.1 Sites of relevance

2.1.1 The European sites to which HRA applies include Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar sites, including any marine components of SAC or SPA. Collectively these form the 'Natura 2000' network of European conservation sites.

2.1.2 The Magic Map web resource⁶ to which guidance points identifies two European sites within 15km of the Borough boundary, Epping Forest SAC and Lee Valley SPA/Ramsar site as shown below. While the River Thames is a proposed Marine Conservation Zone (MCZ) it is not a designated SAC or SPA and thus not subject to HRA.

⁶ <http://www.natureonthemap.naturalengland.org.uk/magicmap.aspx>

Map 1: Newham in relation to European Sites of Natural Conservation Interest



2.2 Lee Valley SPA / Ramsar

2.2.1 Regarding relevant zones of influence, a 400m buffer is frequently used to define a zone within which housing developments would have a likely significant effect on conservation assets (e.g. the 'exclusion zone' defined by Guildford Borough Council for the Thames Basin Heaths SPA in 2015). Such 400m zones are based on the increased likelihood of domestic cat predation and increased levels of human access.

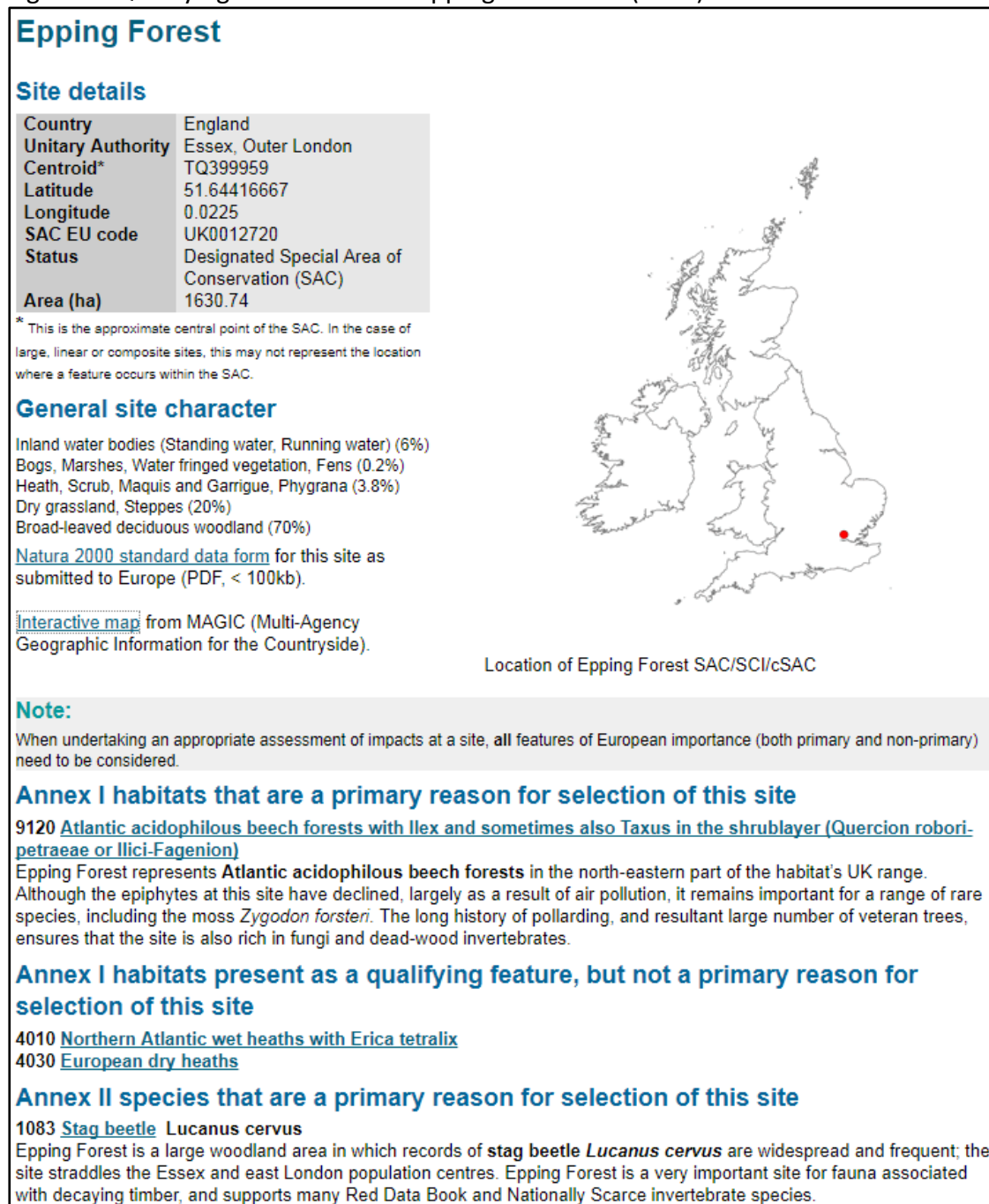
2.2.2 At its nearest point, the plan area to which this Local Plan review relates (noting that the LLDC area no longer falls under Newham's Local Plan) is ~4.3km from the designated SPA. As no issue with the consideration of the Lee Valley SPA / Ramsar site has been raised by Natural England, and as any impacts would likely be *less* significant than those associated with the Epping Forest SAC (as the SPA lies ~ twice as far away), it is screened out of the remainder of this assessment.

2.3 Epping Forest SAC

2.3.1 Qualifying features of the Epping Forest SAC are summarised by the Joint Nature Conservation Committee (JNCC) as follows⁷. Note there are no maps available that show distribution of qualifying features at site level.

⁷ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012720>

Figure 1: Qualifying Features of the Epping Forest SAC (JNCC)



2.3.2 Further information is available from the SAC Citation⁸ hosted by Natural England⁹:

⁸ <http://publications.naturalengland.org.uk/file/5153389482606592>

⁹ <http://publications.naturalengland.org.uk/publication/5908284745711616>

Site description:

Epping Forest is a large ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. The semi-natural woodland is particularly extensive but the Forest plains are also a major feature and contain a variety of unimproved acid grasslands.

The semi-natural woodlands of Epping Forest include important beech *Fagus sylvatica* forests on acid soils, which are important for a range of rare epiphytic species, including the moss *Zygodon forsteri*. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and invertebrates associated with decaying timber. Records of stag beetle *Lucanus cervus* are widespread and frequent.

Areas of acidic grassland transitional with heathland are generally dominated by a mixture of fine-leaved grasses. In marshier areas, purple moor-grass *Molinia caerulea* frequently becomes dominant. Broad-leaved herbs typical of acidic grassland and heathland are frequent, including heather *Calluna vulgaris*. The site also contains an example of wet dwarf-shrub heath with both heather and cross-leaved heath *Erica tetralix*.

2.3.3 Natural England in partnership with Natura 2000 also sets out the following Conservation Objectives¹⁰:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- **The extent and distribution of qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely**
- **The populations of qualifying species, and,**
- **The distribution of qualifying species within the site.**

¹⁰ <http://publications.naturalengland.org.uk/file/4926121657237504>

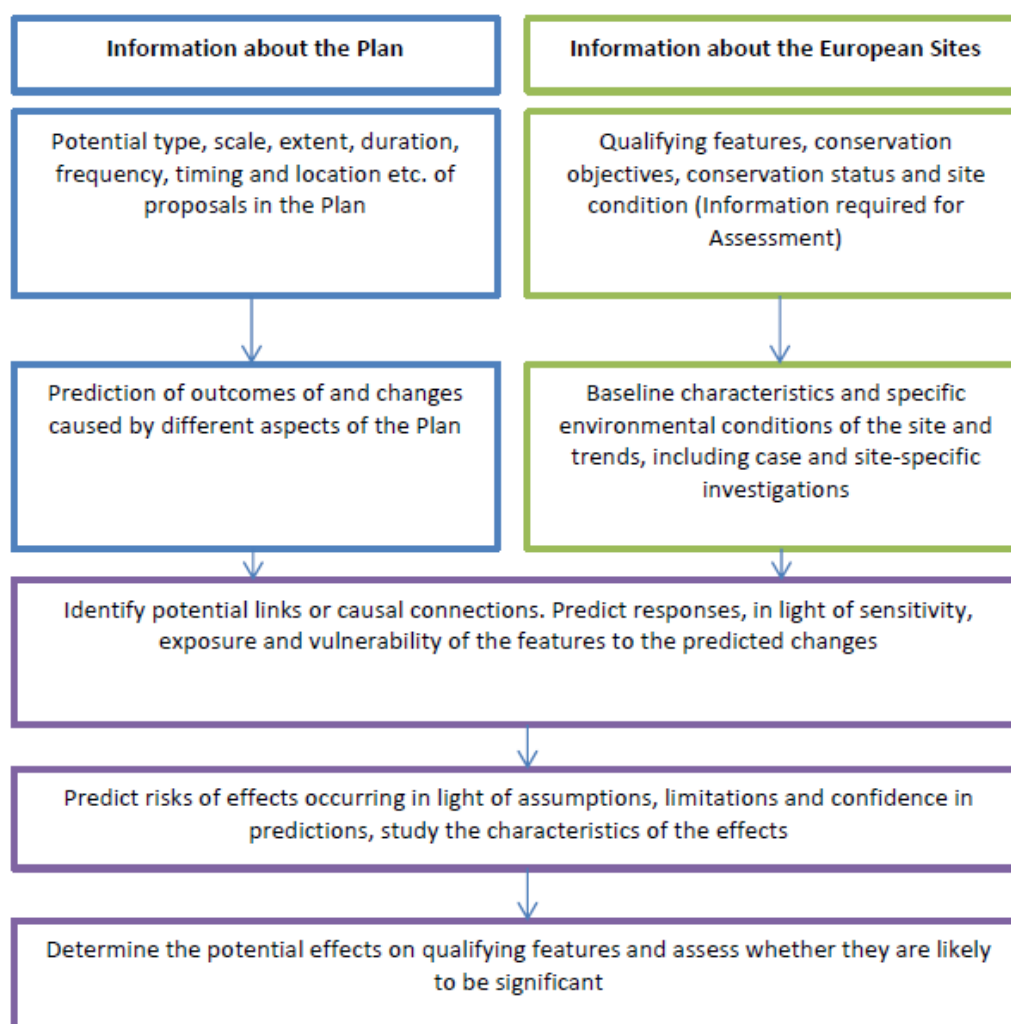
3 Scope and methodology

3.1 Approach to assessment

3.1.1 The approach to assessment follows guidance in Tyldesley & Chapman (2013) on carrying out Stage 1 screening assessments of plans. It essentially requires the combination of two strands of information:

- information about the plan and its likely outcomes, and
- information about the qualifying features of relevant European sites, their conservation objectives, site condition and identified vulnerabilities.

3.1.2 This process can be illustrated by the following flowchart:



3.1.3 In order to focus on those areas of the revised Local Plan which may have an effect on the qualifying features, the assessment first considers information about the European site, and in particular the sensitivity of qualifying features to pressures or threats which may affect the maintenance or attainment of favourable

conservation status. It then considers how these vulnerabilities may be affected by the Plan's remit, and then screens policies accordingly, considering how these might be linked to the effects or how they otherwise interact to mitigate them.

4 Likelihood of Significant Effects

4.1 Sensitivity of qualifying features in relation to plan remit

4.1.1 As per requirements under Article 17 of the EU Habitats Directive, Information regarding the ongoing status of UK Natura 2000 sites is reported by the JNCC on a 6-yearly basis. The most recent of these was the 3rd iteration issued in 2013¹¹. Conservation status of qualifying features within the Epping Forest SAC was reported as follows, in regard to habitats and species:

Table 1: Conservation Status of Qualifying Features

Habitat	Area	Structures and functions	Future prospects	Overall assessment
H9120: Beech forests on acid soils	Inadequate, stable	Bad, stable	Bad, stable	Bad, stable
H4010: Wet heaths	Favourable	Bad, declining	Bad, improving	Bad, stable
H4030: Dry heaths	Favourable	Bad, declining	Bad, improving	Bad, stable

Species	Population size and trend	Habitat for the species	Future prospects	Overall assessment
S1083: stag beetle	Favourable	Favourable	Favourable	Favourable

Site condition

¹¹ <http://jncc.defra.gov.uk/article17>

4.1.2 Common Standards Monitoring (CSM) was developed by the JNCC as a means of assessing the ongoing condition of protected sites¹². Seven categories for the condition of interest features were established; these are used in Natural England's SSSI unit condition reporting, available online¹³.

4.1.3 While a number of reporting lines date from 2010, several have been updated as recently as 2017. The commentary and 'adverse condition reasons' presented alongside 'unfavourable' unit assessments make clear that air pollution, and the associated effects of nitrogen and acid deposits, are the primary cause of adverse conditions. In addition, some issues of public access and disturbance are noted.

4.1.4 Natural England produces Site Improvement Plans (SIP) for each Natura 2000 site to provide an overview of the current and predicted issues affecting the qualifying features and outline priority measures required to improve their condition. The plan summary of the latest SIP for Epping Forest¹⁴ (version 1.1 dated December 2016) is reproduced below:

Table 2: Epping Forest SAC: Site Improvement Summary

Plan Summary				
<i>This table shows the prioritised issues for the site(s), the features they affect, the proposed measures to address the issues and the delivery bodies whose involvement is required to deliver the measures. The list of delivery bodies will include those who have agreed to the actions as well as those where discussions over their role in delivering the actions is on-going.</i>				
Priority & Issue	Pressure or Threat	Feature(s) affected	Measure	Delivery Bodies
1 Air Pollution: impact of atmospheric nitrogen deposition	Pressure	H4010 Wet heathland with cross-leaved heath, H4030 European dry heaths, H9120 Beech forests on acid soils	Establish a Site Nitrogen Action Plan	Natural England
2 Undergrazing	Pressure	H4010 Wet heathland with cross-leaved heath, H4030 European dry heaths	Partnership agreement to ensure sufficient resources for appropriate grazing	Natural England, Conservators of Epping Forest
3 Public Access/Disturbance	Pressure	H4010 Wet heathland with cross-leaved heath, H4030 European dry heaths, H9120 Beech forests on acid soils	Identify key areas and agree a plan to maintain SAC features	Natural England, Conservators of Epping Forest
4 Changes in species distributions	Threat	H9120 Beech forests on acid soils	Investigate tree health and recruitment in key areas to establish a baseline for monitoring. Agree actions and implement a management plan	Natural England, University(ies), Conservators of Epping Forest
5 Inappropriate water levels	Threat	H4010 Wet heathland with cross-leaved heath	Hydrological monitoring, and a possible water level management plan	Environment Agency, Natural England, City of London (Epping Forest)
6 Water Pollution	Threat	H4010 Wet heathland with cross-leaved heath	Investigate water quality run-off from roads, agree actions and implement a management plan	Essex County Council, Natural England, Conservators of Epping Forest
7 Invasive species	Threat	H4010 Wet heathland with cross-leaved heath	Investigate impact, agree actions and implement a management plan	Natural England, University(ies), The Heather Trust, Conservators of Epping Forest
8 Disease	Threat	H9120 Beech forests on acid soils	Investigate impact, agree actions and implement a management plan	Forestry Commission, Natural England, University(ies), Conservators of Epping Forest
9 Invasive species	Pressure/Threat	H9120 Beech forests on acid soils	Investigate impact and review the current monitoring programme, agree actions and implement a management plan	Forestry Commission, Natural England, University(ies), Conservators of Epping Forest

¹² <http://jncc.defra.gov.uk/page-2217>

¹³ <https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1001814&ReportTitle=EPPING%20FOREST>

¹⁴ <http://publications.naturalengland.org.uk/publication/6663446854631424>

4.1.5 Given its remit and the distance of the plan area to the designated site (>2kms), Newham's Local Plan is not considered likely to have any effects (alone or in combination with other plans) in relation to the issues of undergrazing (2), changes in species distribution (4), inappropriate water levels (5), disease (8), or invasive species (7&9).

4.1.6 However, given the 'policy off' (i.e. if policies were not in place to mitigate these impacts) potential effects of regional population and economic growth which the plan seeks to accommodate on traffic levels and hence air and associated runoff-related water pollution, including nitrogen oxides and hence nitrate deposition, and on recreational use of open spaces, there is a possibility Newham's Local Plan could have effects in relation to identified issues 1 (Air pollution – atmospheric nitrogen deposition) and 3 (Public access/disturbance) and 6, (Water pollution). The remainder of this Screening Assessment will focus on these two issues; the SIP confirms that while they affect the 3 qualifying habitats, air pollution and public access do not affect the qualifying species (the stag beetle). The next section examines the spatial aspects of these potential impact pathways and the extent of likely significance either along or in combination with similar plans from closer authorities.

4.2 Traffic trends and effects

Commuting flows between Newham and the European site

4.2.1 2011 census information (as analysed by the 2016 [Outer North East London Strategic Housing Market Assessment](#), page 25) shows that 60% of people working in Newham live in the borough, while 45% of all those living in Newham also stay within the borough for work. The next most likely work destinations for Newham residents are Westminster / the City of London (15%) or Tower Hamlets (10%), both of which are accessed by east-west travel and most likely via the public transport network.

Table 3: SHMA Travel to Work tables

Figure 3: Residence Location by Work in North East London Boroughs (Source: Census 2011 - Note: Top five values shown, based on at least one borough having no less than 5%)

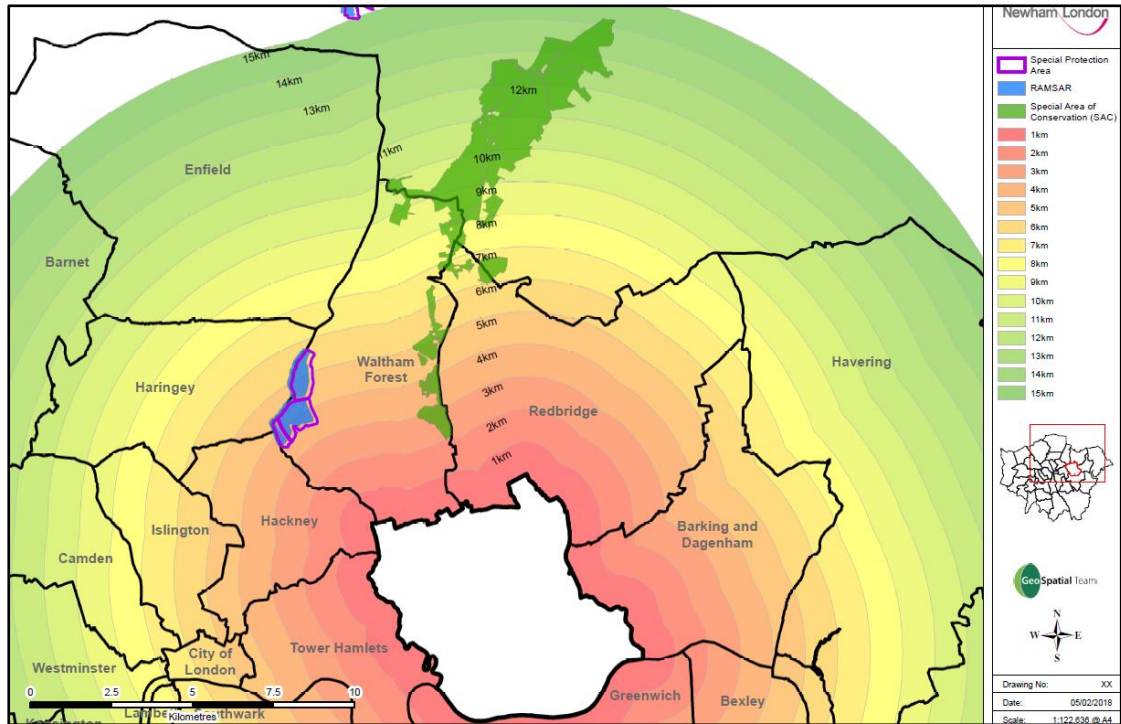
		Work in									
		Barking and Dagenham		Havering		Newham		Redbridge		Waltham Forest	
Reside in	Barking and Dagenham	54%	Havering	66%	Newham	60%	Redbridge	63%	Waltham Forest	68%	
	Havering	13%	Barking and Dagenham	8%	Redbridge	8%	Barking and Dagenham	7%	Redbridge	7%	
	Redbridge	8%	Redbridge	5%	Barking and Dagenham	5%	Havering	7%	Newham	4%	
	Newham	5%	Thurrock	4%	Waltham Forest	5%	Waltham Forest	5%	Epping Forest	3%	
	Thurrock	5%	Brentwood	3%	Havering	4%	Newham	4%	Enfield	3%	

Figure 4: Work Location by Resident in North East London Boroughs (Source: Census 2011 - Note: Top six values shown, based on at least one borough having no less than 5%)

		Reside in									
		Barking and Dagenham		Havering		Newham		Redbridge		Waltham Forest	
Work in	Barking and Dagenham	43%	Havering	50%	Newham	45%	Redbridge	41%	Waltham Forest	43%	
	Havering	9%	Westminster City of London	12%	Westminster City of London	15%	Westminster City of London	14%	Westminster City of London	15%	
	Westminster City of London	9%	Barking and Dagenham	7%	Tower Hamlets	10%	Tower Hamlets	8%	Camden	5%	
	Redbridge	8%	Tower Hamlets	5%	Camden	4%	Newham	7%	Tower Hamlets	5%	
	Newham	7%	Redbridge	5%	Redbridge	3%	Waltham Forest	5%	Islington	4%	
	Tower Hamlets	6%	Thurrock	3%	Islington	3%	Barking and Dagenham	4%	Hackney	4%	

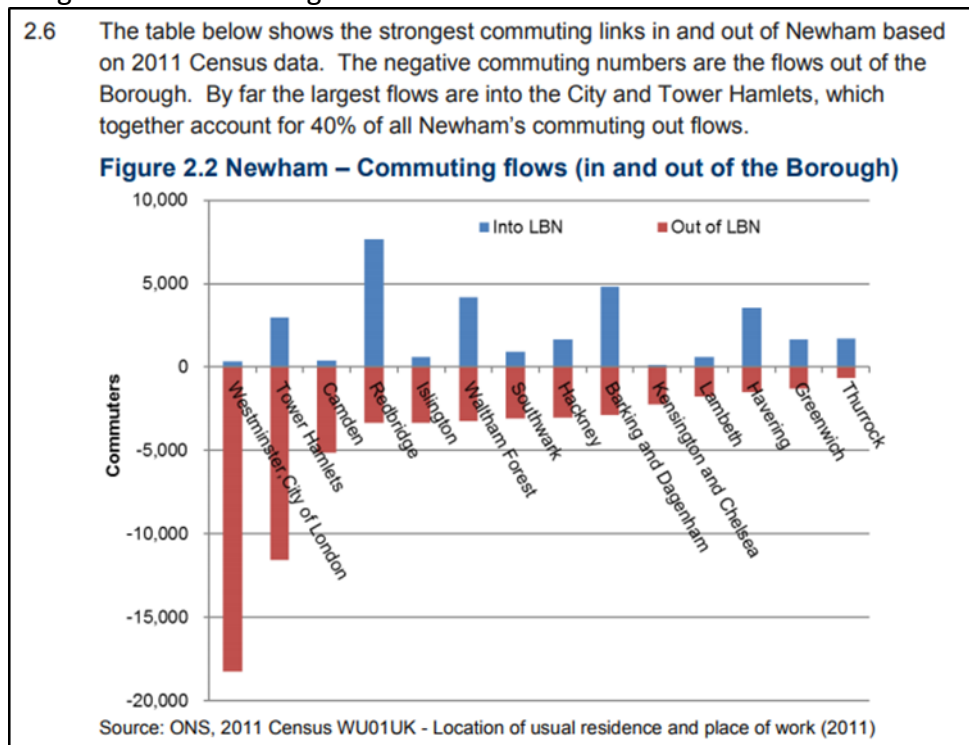
4.2.2 The information shows that the proportion of travel to/from work between Newham and Waltham Forest or Redbridge (the boroughs that house the nearest parts of the Epping Forest SAC and would have to be travelled to or through to be within a 200m immediate impact range of the European site, as shown by the map below) is negligible (3% to Redbridge, less for Waltham Forest). Moreover, only 4% of Waltham Forest's workforce lives in Newham with no record of Waltham Forest residents working in Newham. Similarly 4% of Redbridge's workforce lives in Newham, with 7% of Redbridge residents working in Newham. There is no distinction as to the proportion of such journeys made by road in this spatial commuting data, however in turn the figures are likely to be further reduced once public transport connections (such as the Central Line and National Rail lines into Stratford) are accounted for.

Map 2: Distances from Epping Forest SAC



4.2.3 The 2017 [Employment Land Review Demand Assessment](#) uses the same 2011 census information but presents it (at page 5) using overall numbers rather than percentages.

Figure 2: Inter-borough commuter connections in numbers



4.2.4 These travel patterns are corroborated by other studies and strategies that examine the longstanding traffic problems in and around the Epping Forest along with contributing factors and possible solutions / mitigation approaches.

4.2.5 The [Redbridge Infrastructure Delivery Plan](#) (July 2016) notes the ongoing issue of traffic congestion including on the A406 and A12. Whilst this is likely to increase further with growth it states, the opening of Crossrail gives some scope for relief, alongside new bus services such as the East London Transit. Of these, Crossrail is most relevant for commuting to/from Newham, with the East London Transit presently focused on connections between Barking & Dagenham and Redbridge.

4.2.6 Waltham Forest 's Strategic Infrastructure Plan: Transport Infrastructure Needs Assessment (dating from 2009) discusses the alleviation of road traffic, in part to Newham and the wider Lower Lea Valley Opportunity Area by schemes including the Lea Bridge station re-opening and the re-instatement of the Hall Farm Curve to establish a direct link between Chingford and Stratford. The former was achieved in 2015, whilst the latter is being considered beyond 2020.

4.2.7 Epping Forest District Council [Infrastructure Delivery Plan](#) (December 2017, prepared to accompany their [Submission Version Local Plan](#)) identifies 'out migration' (i.e. residents of the district commuting out for work) as the primary source of traffic congestion (page 21), as well as focussing on planned growth within the district itself (as opposed to elsewhere) putting increased pressure on existing provision (page 20).

4.2.8 The [Essex County Council Local Transport Plan](#) aims to reduce emissions and improve air quality (one of 5 key outcomes) and sets out priorities for West Essex (in which Epping Forest falls) that include greater connectivity for rural communities; improving Underground connections to London; improving the sustainable transport offer to increase modal share; improving access to Stansted Airport by sustainable modes; and lobbying Government for improvements to the M11 and West Anglia rail services (page 185). While the ECC plan does not comment specifically on car journeys between Newham and the areas surrounding the European site, it is apparent that none of the priorities identified appear to directly relate to problematic road based traffic flows between Newham and West Essex in the 200m vicinity of Epping Forest SAC.

4.2.9 Whilst the impact of Newham's residential growth appears unlikely to impact significantly on the SAC therefore, it is possible that the impact of Newham's growing economic base could induce more flows from Waltham Forest and Redbridge and potentially beyond into Newham via roads. However, a review of a stratified sample Travel Plans and EIAs submitted with major development schemes, including employment based ones in Newham over the last 3 years found no reporting of likely effects on the European site, presumably partly due to the prevalence of public transport access and more localised labour movements. The likelihood of travel between the development locations and the vicinity European site was also conspicuously absent. While this is not in itself conclusive regarding the

potential cumulative and in combination effects of growth within Newham, it is an indication that such travel and its effects was not considered a likely or significant eventuality by the independent experts who prepared and reviewed their ESs and Travel Plans .

4.2.10 Nonetheless, it is clear that there is some commuter travel between the relevant authority areas which may impact on roads and air quality affecting the SAC, and there is development planned through the Local Plan that could increase this, albeit at a proportionally lower rate to increases in other directions. Whilst unlikely to be significant in itself, it could be significant in combination with growth projected in neighbouring authorities, notably Waltham Forest and Redbridge. In line with the precautionary principle advanced by the Habitat Regulations, therefore, this effect is screened in.

Freight movements

4.2.11 Natural England's distance criteria confirms that the roads of interest when considering the effects of exhaust pollution on nitrogen deposits are those within 200m of the conservation asset. Road and traffic mapping (depicted below) combined with the SAC boundaries confirm the significant roads linking Newham to the European site are the North Circular (A406) and A12; note the M11 falls outside the relevant 200m zone. The North Circular in particular is a known important freight route for Newham businesses, in conjunction with the A13 which is in excess of 6 Km from the SAC, and the M11 – note that much freight traffic would be expected to use the M11 rather than take the A406 onwards through Epping Forest. The A12 is far less significant, with the bulk of commercial/freight movements on it passing through rather than having origins or destinations in Newham; the only freight movements on it that might be expected would be derived from the western part of the Royal Docks, and to some extent Cody Road.

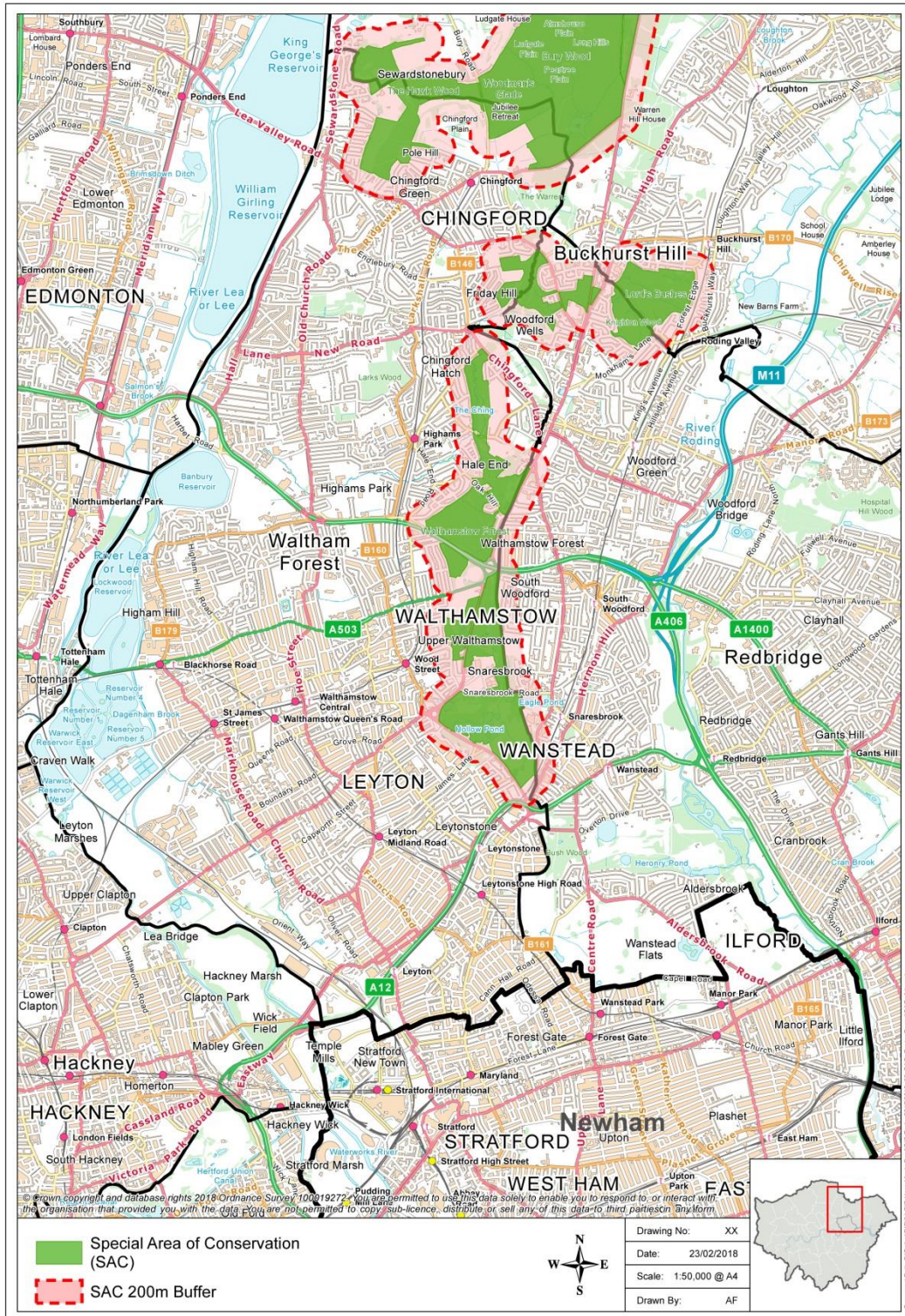
4.2.12 However, high baseline traffic flows on the North Circular Road mean that contributions from traffic generated by additional developments that feed onto it (such as in the Beckton area) are unlikely to be regarded as significant; the Environment Agency significance threshold is a 1% 'process contribution' to the relevant air quality standard (Critical Level or Critical Load).

4.2.13 Nevertheless, it is again possible that in combination with other similar development plans in the area, growth could create in combination significant effects.

4.3 Pollution dispersal and deposition from within Newham

4.3.1 As per the above reference to the 200m zone of influence, air quality impacts (and knock on water quality impacts) from within Newham (i.e. not those generated by travel towards/past Epping Forest SAC) are screened out, as their contribution to local nitrogen deposits would due to dispersal, be absorbed as part of the background. .

Map 4: Main roads connecting with Newham passing within 200m of the SAC



4.4 Recreational patterns in Newham

4.4.1 Figures from Natural England's 'Engagement with the Natural Environment' survey, as reported in the Public Health Outcomes Framework¹⁵, show Newham residents use of outdoor spaces for health and exercise reasons is comparatively low, expressed as 10.1% compared to the London average of 12.3% and the national average of 17.9%.

4.4.2 The major factors thought to influence people's decision to use parks and open spaces are location/proximity; aesthetics; amenities; maintenance standards; and perceptions of safety¹⁶. While clear data on the relevance of proximity / convenience to the use of outdoor recreation spaces use does not exist (in general or for Newham), Liveability surveys¹⁷ show that the most frequently used parks by Newham residents are West Ham Park, Central Park, and Plashet Park, followed by Beckton District Park, Plaistow, Stratford, and Little Ilford. As summarised by Newham's forthcoming Park Investment Activation Plan¹⁸ these more popular spaces tend to be larger, and with better provision of facilities (sports facilities, playgrounds and toilets for example) when compared to lower-usage spaces like Star Park, King George V Park and Keir Hardie Recreation Ground. All of these are less natural spaces, suggesting there is a greater preference for using these (as opposed to natural green spaces such as Epping Forest) by residents in Newham.

4.4.3 In turn, research by Footprint Ecology on behalf of the City of London Corporation (the Conservators of Epping Forest) has included surveys conducted across the years 2010 to 2014 to establish the spatial distribution of visitors to the forest. While, as depicted below, visitors from Newham make up a relatively small fraction of the visitor data recorded, new research (forthcoming) establishes a 6.2km zone of influence in relation to recreational disturbance within the Epping Forest which includes Newham.

4.4.4 As the map below shows, roughly the northern 'half' of the borough falls within the newly suggested 6.2km zone of influence. Significantly, the vast bulk of Local Plan growth falls outside this zone (e.g. in Canning Town / Custom House and the Royal Docks / Beckton). Housing projections for Strategic Site allocations (the sites to which the majority of the plan's housing growth is directed) show 71.46% outside the zone of influence with only 28.54% within it¹⁹.

¹⁵ <https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data>

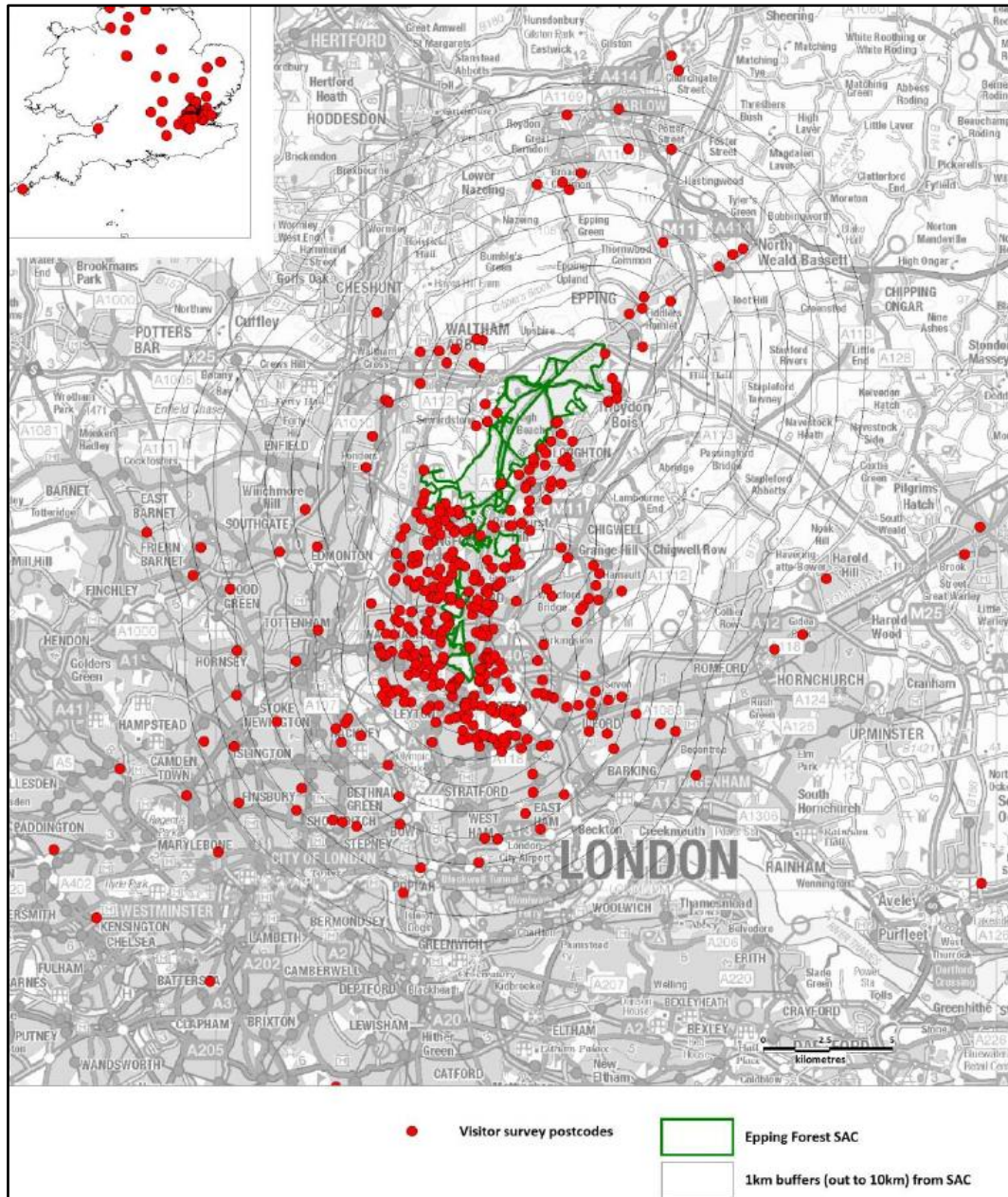
¹⁶ Characteristics of urban parks associated with park use and physical activity, McCormack et al 2010 GR1 [McCormack, G., et al \(2010\) Urban Green Nation: Building the Evidence Base](#)

¹⁷ LB Newham 2015

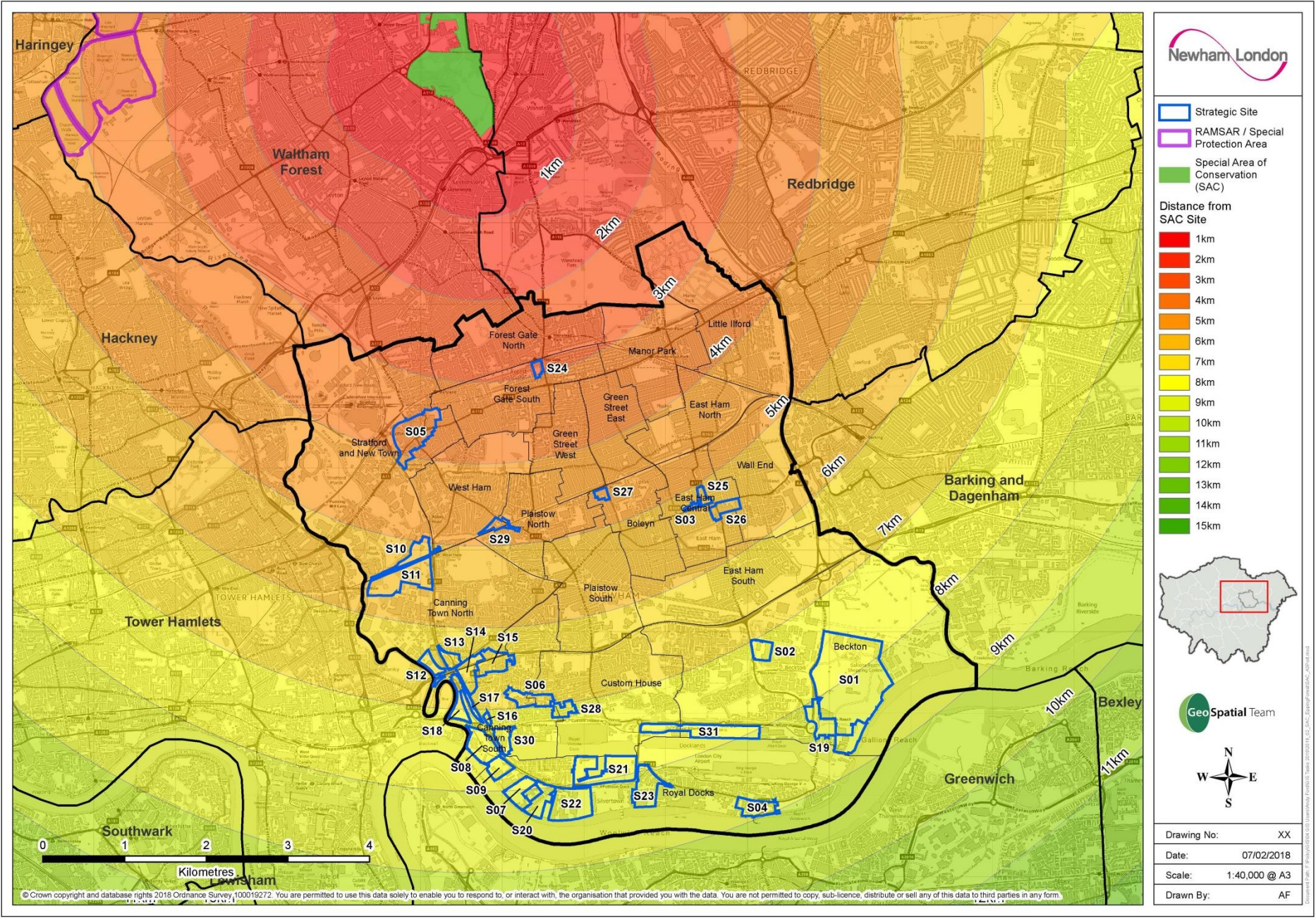
¹⁸ publication was expected February 2018

¹⁹ Figures for individual Strategic Site allocations are not published as they prejudice the planning consent process, background data can be supplied to the Inspector if needed.

Map 5: Distribution of Epping Forest SAC visitor origins



Map 6: Proximity of Newham Local Plan (as Proposed) Strategic Sites to Epping Forest SAC



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4.4.5 The **precautionary principle** dictates that where data is not available, the HRA process should err on the side of caution. As such, while the above suggests that recreational disturbance within the Epping Forest is not likely to be significantly increased by Newham residents and the growth predicted within Newham alone, it cannot be discounted (given the relevance of the zone of influence) that the plan may contribute to 'in combination' effects given wider growth across the region and in Waltham Forest and Redbridge. While the London Plan directs and encompasses this growth, and as such its associated HRA is the place for a more comprehensive assessment, Local Plan safeguarding and mitigation options will be explored through the screening assessment below.

5 Screening Assessment

5.1.1 As established above, while significant direct effects on the European site are considered unlikely, the possibility of in combination effects in relation to air (and hence water) quality and recreational use cannot be ruled out. This screening assessment will identify plan policies of relevance to the identified issues and set out appropriate safeguarding and mitigation measures already existing within, and needing to be incorporated into the plan.

5.1 Initial Screening

5.1.2 Key policy areas with the potential to impact on Epping Forest SAC can be defined as those which could impact on the Conservation Objectives, (see para 2.3.3) or which would exacerbate or mitigate the Pressures and Threats set out in the Site Improvement Plan (Table X). The following is a typically used list of screening criteria, against which relevant Local Plan Review Policies are initially screened in as highlighted in red. Policies which allocate sites for development are only screened in if the scale of the development is strategic, given the above discussion of significance. INF3 is not screened in, as its primary strategic lead is taken from the Joint East London Waste Plan which has in itself been subject to HRA. .

- Policies governing impacts upon a European site – **SC4**
- Policies affecting overall levels of growth **S1, H1, J1**
- Policies affecting development location within or movement to within European Site 'risk zone'
 - Traffic on roads passing within 200m (for freight) **S3, S5, S2, S6**
 - 6.2km (for recreation use and associated reasonably possibility of commuting by road) **S2, S4, S6, H1,**
- Policies affecting recreational opportunities, particularly within 6.2km of Epping Forest SAC; **S2, S4, S6, INF7, INF9**
- Policies affecting air quality, particularly those relating to transport planning and vehicle use; **SC5, SP9, INF1, INF2**
- Policies affecting water quality and water supply; **SC4, INF4, SC1**
- Policies relating to climate change. **SC1**

5.1.3 These policies are considered in more detail below, with those that should benefit or have neutral effect on the SAC screened out.

5.2 Second Screening of Local Plan policies

Policy	Assessment and reasoning	Screening conclusion
Spatial Policies		
S1 Spatial Strategy & Strategic Framework	While this policy does not allocate sites (this is done via the area-specific policies below) it does set the overall vision of growth enshrined in the plan, showing the change from the previous position of 37,500 homes over the 2012-2027 plan period to the proposed position of 43,000 new homes over the 2018-2033 plan period. It also concerned with good growth, including an understanding of cumulative impacts and infrastructure deficits, as well as positively planning for new infrastructure needs. Whilst this is intended to have an overall at least neutral effect, the policy is screened in to examine whether this balance is appropriately effected.	Screened in
S2 Stratford and West Ham	This policy allocates the following Strategic Sites for mixed use: S05 Stratford Central, S10 Abbey Mills, and S29 Plaistow North. All are within the 6.2km zone of influence and S05 may also generate impacts on the A406 (via the Romford Road). However, significant new open space is also specified in the Lea River Park, and improvements to sustainable transport which should help alleviate significant effects. Policy is screened in to look at the balance of these effects in conjunction with other policies.	Screened in
S3 Royal Docks	This policy allocates the following Strategic Sites which might be expected to generate freight traffic on the A12: S09, S07; and S04 which might generate freight traffic onto the A406. However, it also promotes wharf re-activation and consolidation which should help offset this. Whilst this should have an overall neutral effect, the policy is screened in to examine whether this balance is appropriately affected in conjunction with other policies.	Screened in
S4 Canning Town and Custom House	Under this policy, Strategic Site S11 (Parcelforce) is allocated for mixed use development within the 6.2km zone of influence and it also promotes Strategic Sites which may give rise to freight generating movements on the A12 and/or North Circular (via the A13) in Canning Town town centre (S14) and Canning Town Riverside (S12). However, significant new open space is also specified in the Lea River Park and improvements to sustainable transport which should help offset this. Policy is screened in to look at the balance of these effects in conjunction with other policies.	Screened in
S5 Beckton	Under this policy, no Strategic Sites are within the 6.2km zone of influence, but there may be potential freight movements onto the A406 associated with SIL development in S01, although scope for river transport is also acknowledged, and future river crossings may divert freight traffic towards Kent-based ports instead of the M11. Scoped in to examine whether the balance of these effects in conjunction with other policies.	Screened in
S6 Urban Newham	This policy allocates the following Strategic Sites for mixed use: S24 Woodgrange Road West, S25 East Ham Market,	Screened in

	S26 East Ham Town Hall Campus, S03 East Ham Western Gateway, and S27 Queen's Market. All are within the 6.2km zone of influence and the commercial elements of S25, S24 and S27 may also have freight traffic impacts on the North Circular or A12. However the policy also promotes new recreational opportunities in the Metropolitan open land in the east of the borough. Screened into to examine the balance of these effects in conjunction with other policies.	
Theme: Successful Places		
SP9 Cumulative Impact	This policy concerns the need for all scales of development to consider cumulative impacts in relation to various problem issues which include air quality, water quality, and parks deficiency. Given its reiteration of the importance of avoiding any increase in specified pollutants the policy, and avoid increases in parks deficiency, the policy is likely to have neutral or positive on air quality and recreational impact and hence significant effects so is screened out.	Screened out
Theme: Jobs, Business and Skills		
J1 Business and Jobs Growth	This policy concerns jobs growth and the desirability of attracting new business to the borough and nurturing developing business, affecting possible commuting levels and freight traffic. As such it is directly linked to growth though it does not allocate specific development sites. However, it also speaks to increasing local employment and balancing the needs of the economy with other needs including that of the environment, so could have a neutral effect by reducing commuting across borough boundaries and appropriate checks and balances. Screened in to look at this balance in conjunction with other policies.	Screened in
Theme: Homes		
H1 Building Sustainable Mixed Communities	This policy concerns the overall delivery of new homes to meet identified needs, as such it directly relates to growth. Whilst it additional refers to good growth considerations including density sensitive to local context and character and be appropriate in relation to open space availability, transport, retail, community and other supporting facilities. Screened in to examine the balance of this in implementation in conjunction with other policies.	Screened in
Theme: Sustainability & Climate Change		
SC1 Environmental Resilience	This policy seeks to promote environmental resilience, whereby development will both protect the environment and become more resilient to it – minor amendments add reference to source protection zones for instance. Screened out as likely to have at least a neutral effect.	Screened out
SC4 Biodiversity	Promotes biodiversity net gain and enhancement, including via avoiding significant adverse impacts on protected species and habitats, taking into account direct, indirect and cumulative effects. Minor amendments proposed clarify expectations in relation to SACs and evolving information about in-combination significant effects, including joint working via Duty to Co-operate where necessary on monitoring and implementation of a strategic solution where indicated. Should have a positive effect so screened out.	Screened out

SC5 Air Quality	Likely to have a positive effect given its more stringent approach to air pollution, including 'at least air quality negative' requirements, so screened out.	Screened out
Theme: Infrastructure		
INF1 Strategic Transport	Seeks to manage the effects of growth by providing adequate strategic transport infrastructure, notably significant investment in non-car modes to encourage modal shift away from cars, and wharves to encourage river based transport. However, it also includes some projects which may generate traffic and air quality impacts in of themselves at least in the construction phases. The policy does however make more explicit reference to assessment of negative environmental impacts and clear options appraisal. Screened in to look at the balance of these impacts in implementation in conjunction with other policies.	Screened in
INF2 Sustainable Transport	Seeks to manage the effects of growth by promoting modal shift to sustainable modes for private travel and commercial/logistics movements, as well as appropriate consideration and mitigation of network impacts. Should have an overall positive effect so screened out.	Screened out
INF4 Utilities Infrastructure	Seeks to ensure growth is adequately provided for in relation to utilities infrastructure, facilitating strategic investment to ensure the longer term sustainability of water supply. Screened out as should have a neutral or positive impact on the SAC.	Screened out
INF6 Green Infrastructure & the Blue Ribbon Network	Protects green infrastructure and the blue ribbon network in conjunction with SC4, acknowledging its multiple role, and assessing impacts in relation to these, having regard for cumulative impacts, and particular regard for quantum in areas of parks deficiency. Proposed minor amendment clarifies the presumption in favour of site protection. Screened out as should have a positive effect in offsetting recreational intensification.	Screened out
INF7 Open Space & Outdoor Recreation	Seeks to ensure that outdoor recreation opportunities are commensurate with growth, increasing accessibility, quality and quantity where relevant and re-stating the protection afforded by INF6. Identifies strategic opportunities for this to occur in the east and west of the borough in conjunction with spatial policies. Proposed minor amendments clarify the role of the IDP in setting out mitigation of increased recreational intensity on existing parks and open spaces via strategic projects, currently including the Lea River Park.	Screened out
INF9 Infrastructure Delivery	Seeks to ensure infrastructure sufficiency, working to reinforce other infrastructure and good growth policies in ensuring growth impacts, including infrastructure deficits, are adequately addressed. Embeds the IDP in policy through which GI projects	Screened out

5.3 Mitigation and Safeguarding Proposals

5.3.1 Of those policies that remain screened in, the next step is to assess whether possible in-combination significant effects of projected growth are adequately safeguarded against and/or mitigated by the policy framework in the round.

Discussion	Outcome and recommendations
Spatial Policies	
<p>S1: the policy in addition to growth specifies that it must occur within the parameters of good growth, including balancing jobs and homes, and ensuring growth is accompanied by timely delivery of supporting infrastructure including that to address existing deficits and cumulative impacts; new and enhanced open spaces connecting through a green grid; that significant modal shift will be achieved through investment in the quality and connectivity of strategic and local route and communications networks; that development is context sensitive, and sustainable development will be achieved through maximising integration of green infrastructure and other sustainable design, technologies and management techniques. The implementation section is clear that the policy is implemented through other thematic policies which as discussed above, provide for neutral or positive effects on the SAC.</p>	<p>No significant effects likely due to offsets within policy and implementation in conjunction with thematic policies, subject to ensuring thematic policies are sufficiently robust to address: 1) context sensitive development including reference to assets beyond the borough. 2) Innovative forms of biodiversity management to account for in combination effects. This is done through proposed amendments to SC4 and SC5 (see below).</p>
<p>S2: The policy sets the spatial parameters for employment and residential growth in this area, and includes reference to improved provision, quality and access to open space, including significant strategic projects the Lea River Park and Queen Elizabeth Olympic Park, both of which provide increased opportunities for recreation in quality, partly natural greenspaces locally. The policy also specifies enhancement of public transport access including interchange and capacity improvements that should benefit passengers in the wider cumulative impact area, helping to encourage modal shift and improvements to air quality in this area. The implementation section is clear that thematic policies direct further considerations: as per section 5.2 above, the particularly relevant ones in this context</p>	<p>No significant effects likely due to offsets within policy and implementation in conjunction with thematic policies, however, all Strategic Site allocations should reference to the Epping Forest SAC in all Strategic Site constraints, the need for Appropriate Assessment for in combination significant effects on recreational intensity and air/water quality and this HRA screening report as a source of further information.</p>

Discussion	Outcome and recommendations
<p>would be SP9, SC5, SC4, INF2, INF7 and INF6. As discussed in section 5.2 above, these provide for neutral or positive effects on the SAC.</p> <p>Strategic Sites which work within this implementation framework specify various on-site infrastructure requirements to complement this, including improved local connectivity, and highlight constraints and further information. However, they should also clearly reference the SAC as a constraint requiring Appropriate Assessment particularly in relation to possible in combination recreational impacts and air/water quality impacts via traffic generation and this HRA as supporting information.</p>	
<p>S3: The policy sets the spatial parameters for growth in this area (Royal Docks) and is clear that implementation should be in conjunction with thematic policies – of which INF2, SC4 and SC5 will be of most relevance for this assessment. As discussed in section 5.2 above, these provide for neutral or positive effects on the SAC.</p> <p>The policy includes employment development on several Strategic Sites which may increase traffic on the A12 and and/or A406. In addition however, it provides for wharf safeguarding, consolidation and reactivation which should help offset any additional freight movements. Nonetheless, Strategic Sites should where relevant more clearly recognise SAC considerations to complete effective safeguarding.</p>	<p>No significant effects likely due to offsets within policy and implementation in conjunction with thematic policies, (though see strengthening of these proposed below). However, Strategic Site allocations S07, S09 and S04 should have reference to the Epping Forest SAC added in the constraints, the need for Appropriate Assessment and this HRA screening report as a source of further information added likewise.</p>
<p>S4: This policy sets the spatial parameters for growth in this area (Canning Town and Custom House) and is clear that implementation should be in conjunction with thematic policies – of which INF2, INF6, INF7, SC4 and SC5 will be of most relevance for this assessment.</p> <p>As discussed in section 5.2 above, these provide for neutral or positive effects on the SAC.</p> <p>Whilst introducing significant new housing</p>	<p>No significant effects likely due to offsets within policy and implementation in conjunction with thematic policies, (though see strengthening of these proposed below). It is also advisable to add reference to the Epping Forest SAC and the need for Appropriate Assessment in relevant Strategic Site constraints, (S11, S14, S12) and this HRA screening report as a source of further information.</p>

Discussion	Outcome and recommendations
<p>notably around West Ham which falls within the zone of influence for recreational impact and road-based commuting, and other Strategic Sites which could increase freight flows close to the SAC, Policy S4 also sets out improved provision, quality and access to open space including the significant strategic project of the Lea River Park. This will offer significant elements of natural greenspace, access to which will be improved (e.g. Bow Creek Ecology Park) and well as improving public transport, walking and cycling access. This should help to lessen the likelihood of recreational and air/water quality impacts on the SAC.</p> <p>The Strategic Site allocations work as part of this strategy and its implementation. However, where relevant, (S11, S14, S12) they should also clearly reference the SAC as a constraint requiring Appropriate Assessment particularly in relation to possible in combination recreational impacts and air/water quality impacts via traffic generation and this HRA as supporting information.</p>	
<p>S5: The policy sets the spatial parameters for growth in this area (Beckton) and is clear that implementation should be in conjunction with thematic policies – of which INF2, SC4 and SC5 will be of most relevance for this assessment. As discussed in section 5.2 above, these provide for neutral or positive effects on the SAC.</p> <p>The Policy includes employment development on S01 which may increase traffic on the A406. In addition however, it provides for provision of Strategic Infrastructure, including an expanded DLR depot (which will be employment generating with limited freight movements) a new DLR station and river crossings, (which may alter traffic volumes and patterns potentially away from the northbound A406 e.g. to Kent based ports) and encourages river transport where possible, all of which should help to lessen any traffic and air/water quality impacts arising. Nonetheless, Strategic Site S01 should where relevant more clearly</p>	<p>No significant effects likely due to offsets within policy and implementation in conjunction with thematic policies, (though see strengthening of these proposed below). It is also advisable to add reference to the Epping Forest SAC and the need for Appropriate Assessment in relevant Strategic Site constraints, (S01) and this HRA screening report as a source of further information.</p>

Discussion	Outcome and recommendations
recognise SAC considerations to complete effective safeguarding.	
<p>S6: This policy sets the spatial parameters for growth in this area (Urban Newham) and is clear that implementation should be in conjunction with thematic policies – of which INF2, INF6, INF7, SC4 and SC5 will be of most relevance for this assessment. As discussed in section 5.2 above, these provide for neutral or positive effects on the SAC.</p> <p>S6 includes reference to opportunities for improvements to open space accessibility particularly along the eastern edge of the area, providing increased opportunities for recreation and access to natural greenspace locally which should help to lessen pressure at the more distant SAC.</p> <p>The Strategic Site allocations work as part of this strategy and its implementation. However, they should also clearly reference the SAC as a constraint requiring Appropriate Assessment particularly in relation to possible in combination recreational impacts and air/water quality impacts via traffic generation and this HRA as supporting information.</p>	<p>Overall, no significant effects likely due to offsets within policy and implementation in conjunction with thematic policies, (though see strengthening of these proposed below). It is also advisable to add reference to the Epping Forest SAC and the need for Appropriate Assessment in Strategic Site constraints, and this HRA screening report as a source of further information.</p>
J1	
<p>Whilst overall promoting economic growth, the policy recognises the need for it to be strategically managed to balance the needs inter alia of the economy and the environment. The policy does this through supporting a diversification to newer, cleaner economic sectors, promoting the development of modern, high quality industrial and business units, spatial criteria that reinforce the requirement of accessible locations for businesses that employ and attract (as visitors/customers) large numbers of people enabling modal shift and attention to managing compatibility with residential uses. However, it could be clarified that other environmental considerations as set out in the SC policies will also apply.</p>	<p>Overall, no likely significant effects due to offsets within policy and implementation in conjunction of wider thematic polices, notably SC4, SC5 and INF2. However, implementation section should clarify that while this policy goes so far to balance the needs of businesses and the environment, these considerations will also be assessed through other plan policies, notably SC1-5 and INF2.</p>
H1	
<p>Although the policy overall promotes considerable growth and population increase, it remains cognisant of the need to</p>	<p>Overall, no likely significant effects due to offsets within policy and implementation in conjunction of wider thematic polices,</p>

Discussion	Outcome and recommendations
<p>ensure that environmental considerations are made, through ensuring that adequate infrastructure (including private/ public open space) is delivered in line with growth, this should alleviate any recreational pressure, though needs to be more clearly tied to Policy INF7/other infrastructure policies.</p> <p>This is achieved through ensuring densities that are reflective of the local context, ensuring the development of quality neighbourhoods. However, it is worth noting that a great deal of both the identified housing supply and any accompanying infrastructure needs are transposed into site allocations within the spatial policies and that other environmental considerations will apply as set out in the SC policies and INF7.</p>	<p>notably SC4, However, the Policy should be amended to refer to density being related to 'environmental capacity' and to clarify in the implementation section that this will include the need to consider impact on the SAC of air/ water quality impacts brought about by growth in traffic (including freight) and recreational intensity as per SC4; and to further ensure that Policy INF7/wider infrastructure policies including INF2 are cross referenced in the implementation section, alongside spatial policies.</p>
INF1	
<p>As with all the infrastructure policies, the policy helps to mitigate the impact of growth, and deliver on the sustainable transport agenda which should benefit air (and hence water) quality to some extent around the Epping Forest Area.</p> <p>There is a clear expectation in the policy regarding the explicit articulation of the options appraisal process including environmental and spatial impacts of the transport proposals. However, this is not backed up in the implementation section with clarification as regards which policy considerations would support this.</p>	<p>Overall no significant effects are likely due to the balance in the policy and implementation in conjunction with other thematic policies. However, it should be clarified in the implementation section that policies SC1-5, SP5, INF6&7 and INF2 will be relevant</p>

5.3.2 AS well as the clarification of the intention of the polices above and their interaction with other policies more positively managing environmental impacts, the following amendments are proposed (as compared to the Proposed Submission Draft Plan, Nov 2017) to these 'positive' policies themselves to enhance their effectiveness in relation to the possibility of in-combination significant effects:

- a) Addition to Policy SC4 making clear that direct and indirect impacts, cumulative and in combination on European sites, including those outside the Borough, should be considered, with the implementation section confirming that the Authority will work with other partners under the Duty to Co-operate obligation to ensure impacts on Epping Forest SAC are kept under review so that assessments can use the best available information and where appropriate, contribute to the implementation of a strategic solution (which could include, as per INF9 a contribution to a relevant IDP project enhancing

provision of alternative natural greenspace, or management measure in Epping Forest itself). The technical criteria and implementation section should also be clarified to make clear that off site contributions will be acceptable where indicated in relation to in combination significant effects on the SAC, and the expectation of screening for HRA on Strategic Sites.

- b) Addition to Policy INF7 para 6.272 and para 6.272c making it clear that [additional] local recreational opportunities, including accessible natural greenspace are also important to help offset the likelihood of SAC impacts
- c) Addition to SC5 making it clear that the SAC needs to be assessed as a sensitive receptor via any significant in-combination traffic and hence air quality impacts on the A12 and A406 that pass within 200m of it.
- d) Addition to INF2:1a.vi clarifying that cumulative impacts that need to be taken into account in this assessment of network effects include those on traffic flows affecting air/water quality in the vicinity of the SAC.

5.3.3 Point a) above is particularly important to keep the solution dynamic and responsive to any potential changes in impacts/impact pathways or our understanding of them, for example, through more significant air quality/pollution dispersal modelling, and new visitor survey data.

5.4 Conclusion

5.4.1 The Plan, in being written as a coherent document designed to be implemented in the round, with a few minor amendments provides a robust policy approach to proactively assessing, preventing (through its spatial strategy e.g. of promoting modal shift and improving open space provision and access within Newham) and where necessary further mitigating the likelihood of effects that contribute to in-combination significance on the Epping Forest SAC. However, it is also necessary to consider in-combination effects of other relevant plans.

5.4.2 Each plan in the area where development may affect the vulnerabilities of Epping Forest SAC (broadly defined by Natural England as Redbridge, Waltham Forest, Enfield, Epping Forest, East Herts, Harlow and Uttlesford District Council, Essex and Hertfordshire County Councils) as it comes forward must assess and mitigate its own effects as overseen by Natural England. This is evident through their own HRAs, although in-combination effects are only recently becoming more explicitly considered (e.g. in Redbridge's 2017 HRA). All recently prepared plans' HRAs have concluded, and where relevant, been found through the Examination process (and in some cases plan modifications) to have concluded robustly, that they will not result in significant effects on the SAC through appropriate mitigation and safeguarding. Whilst a number of these are now dated (e.g. Waltham Forest's adopted Core Strategy, from 2010) as they are reviewed as per Government policy and guidance, this scrutiny is renewed (Waltham Forest have recently produced a

Regulation 18 Local Plan document and associated HRA for instance). In addition is notable that Epping Forest itself is subject to its own management/conservation plan by the Corporation of London, which helps to anticipate and accommodate visitor numbers in ways that limit damage to qualifying features.

5.4.3 Moreover, even if local plans and associated mitigation and safeguarding are out of date, local mitigation and safeguarding action is in turn supported by a broader national and regional framework with which such policies have to be consistent and in general conformity, a policy framework that is also appropriately assessed and cognisant of obligations in relation to European Sites. Indeed, it is clear that policies introduced at the National and European level in terms of vehicle emissions standards, and Pan-London level such as the ULEZ, stricter controls on parking provision and investment in non-car modes to promote modal shift are highly influential in achieving necessary changes in technologies and behaviour, with traffic in London reducing overall²⁰, and road traffic emissions, particularly Nitrogen Oxide emissions projected to significantly improve (by 20%) post 2019²¹ with consequent improvements to air quality. These policies are not only seeking to mitigate impacts of growth, but also improve the status quo.

6 Summary & Conclusions

6.1.1 This assessment has acknowledged the potential for firstly significant effects, and secondly having assessed these to be unlikely, of in-combination significant effects on the designating features of the Epping Forest SAC arising from population growth and economic growth provided for within the Newham's Local Plan Review. In the key areas of planned residential development, economic development and infrastructure development, and through policies positively managing biodiversity, air quality, sustainable transport, green infrastructure and recreational opportunity, the assessment indicates that there would be no likely significant effect on European sites as a consequence of implementing the Local Plan in the round, subject to some project-level mitigation measures provided for in policies as proposed to be amended.

6.1.2 Potential negative effects of increased population size and growth in car and freight traffic on the Epping Forest SAC are in fact largely effectively pre-empted and prevented by the already existing spatial pattern of development and commuting and freight movements, and distribution of planned growth. Policies framed at the national and pan-London level further reinforce trends that are reducing the overall likelihood of air/water quality effects arising.

²⁰ [Travel in London Report 10 \(2017\)](#) – ‘over the longer term, the decrease of 11.0% between 2000 and 2016 in the private transport trip based mode share’ (page 27) and ‘vehicle kilometres by cars, taxis and HGV’s have been declining steadily since 2000’ (page 68). A local example of this is that improvements to public transport connections in Stratford as part of Olympic delivery saw a 15% drop in traffic along the Stratford High Street before / after the 2012 Games, which has been sustained.

²¹ <https://www.london.gov.uk/press-releases/mayoral/ulez-will-start-in-2019-to-tackle-toxic-air>

Data sources

The following documents and web-based sources have been reviewed:

Information about European sites

- Natural England digital boundary datasets
- Natural England Site Improvement Plans
- Natural England SSSI Unit Condition Assessment digital boundary datasets
- City of London Visitor Surveys for Epping Forest.

7.1.3 Local Plan and its potential ecological effects

- Proposed Submission Local Plan and supporting documents including Policies Map Changes, Integrated Impact Assessment, and Options Appraisal

7.1.4 In-combination assessment

Greater London Authority

[Adopted London Plan \(2016\)](#) *HRA seemingly not updated since 2009, no link*
[Draft London Plan \(December 2017\)](#) + [Draft HRA \(Nov 2017\)](#)

Mayor of London's Draft Transport Strategy and IIA

Mayor of London's Water Strategy

Mayor of London's Air Quality Strategy

[Mayor of London's Draft Environment Strategy](#)

London Borough of Waltham Forest

[Core Strategy \(2012\)](#)

[HRA 2011](#)

[Main IDP, 2009](#)

London Borough of Redbridge

[Pre-Submission Local Plan \(July 2016\)](#)

[Schedule of Main Modifications](#)

[Submission HRA \(February 2017\)](#)

[HRA Addendum \(October 2017\)](#)

[IDP, February 2017](#)

London Borough of Enfield

[Core Strategy 2010](#)

[IDP 2014](#)

No HRA available

Epping Forest District Council

[Submission Version Local Plan, 2017](#) (consultation closed Jan 2018)

[EPDC Reg. 19 HRA, December 2017](#)

[EPDC IDP \(December 2017, Part A Report\)](#)

[Existing EPDC Local Plan \(1998 with 2006 alterations\)](#)

East Herts Council

Currently at examination, main modification consultation runs Feb-Mar 29th 2018

[Pre-Submission District Plan \(2016\)](#)

[IDP 2017](#)

[Schedule of Main Mods](#)

[Main Mods HRA \(Feb 2018\)](#)

Harlow Council

[Local Plan \(2006, as saved 2009\)](#)

No HRA or IDP available, review documents emerging but not yet at examination

Uttlesford District Council

[Local Plan \(2005\)](#) *no HRA available*

[IDP \(May 2017\)](#) & [July 2017 Addendum](#)

[Reg.18 HRA, July 2017](#) (accompanies [this](#))

Essex County Council

[Local Transport Plan 2011](#)

No HRA available

Hertfordshire County Council

[Draft Local Transport Plan \(LTP4\)](#) (consultation closed Jan 2018)

[Associated HRA](#)