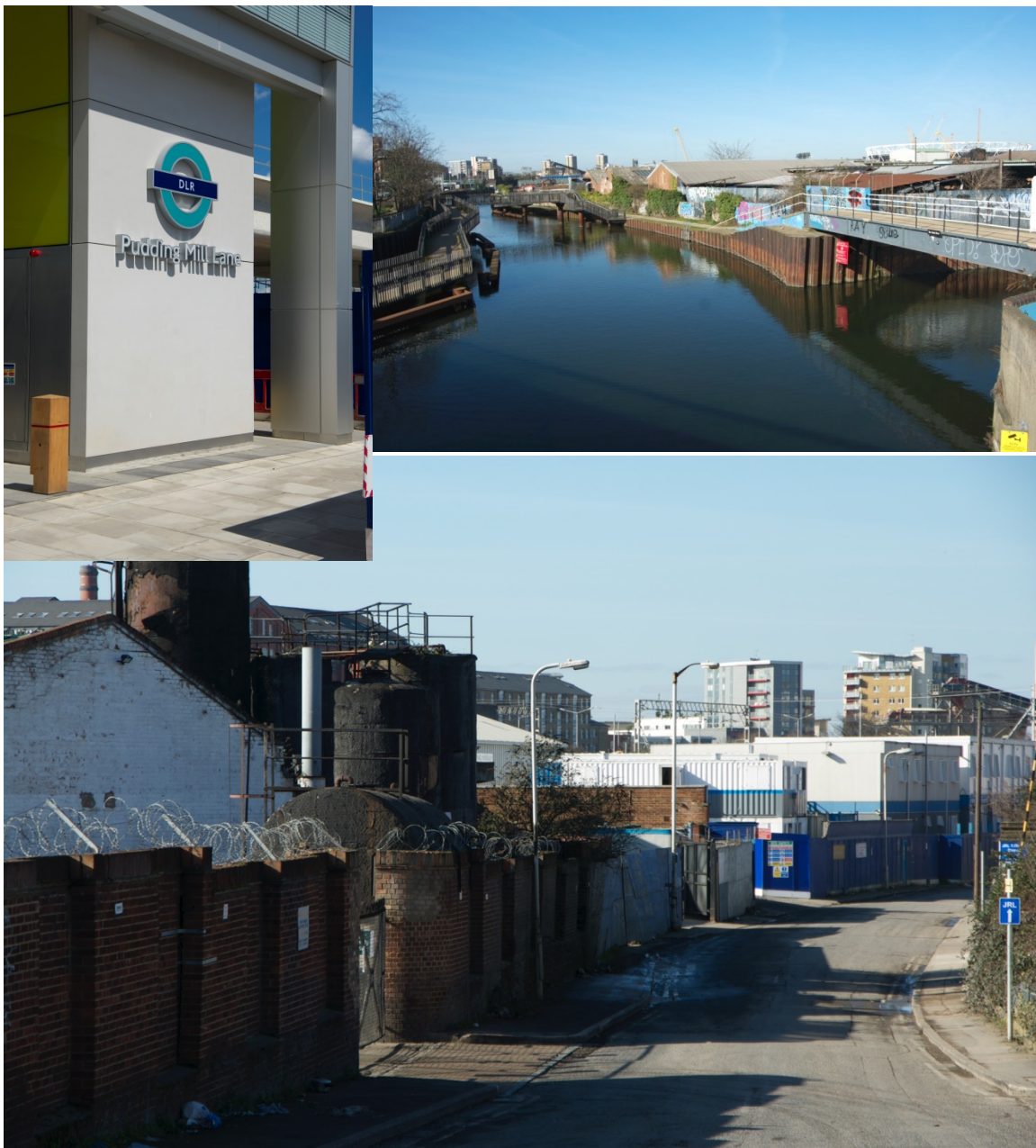


Strategic Environmental Assessment Screening Statement for the Pudding Mill Supplementary Planning Document



Section1: The Strategic Environmental Assessment Screening Process

Introduction

- 1.1 The London Legacy Development Corporation is preparing a Supplementary Planning Document (SPD) to provide further guidance to the Pudding Mill Site Allocation and other relevant policies within its Local Plan. Sections 1.5 and 1.6 of this document describe the proposed scope of the SPD.
- 1.2 This Strategic Environmental Assessment (SEA) screening has been prepared in accordance with the requirements of Directive 2001/42/EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment and the Environmental Assessment of Plans and Programmes Regulations 2004. The following guidance has also been taken into account:
- The National Planning Policy Framework (NPPF) (DCLG, 2012).
 - The national Planning Practice Guidance (PPG ID: 11) in relation to SEA/SA (DCLG, 2015).
 - A Practical Guide to the Strategic environmental Assessment Directive (ODPM, 2005).
- 1.3 The screening consultation was prepared to enable the specified Environmental Bodies (Natural England, Historic England and the Environment Agency) to comment on the appropriateness of the screening process and its conclusion for this proposed SPD. Other bodies that have specifically been invited to comment are:
- London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest;
 - Lee Valley Regional Park Authority
 - Transport for London
 - Greater London Authority
 - Canal & Rivers Trust
- 1.4 The consultation period ran from 18th June to midday on 23rd July 2015. Any comments were invited to be made in writing and returned to the Planning Policy Team at:

Email: planningpolicy@londonlegacy.co.uk

Postal Address: SEA Screening Consultation (Pudding Mill SPD), Planning Policy, London Legacy Development Corporation, Level 10, 1 Stratford Place, Montfichet Road, Stratford London. E20 1EJ.

The results of this consultation and the determination statement are in Section 2 of this document.

SEA Screening process and the Scope of the Pudding Mill SPD

1.5 The purpose of the SPD will be to:

- Build on the policies within the Local Plan
- Provide further guidance on key considerations for applications within the Pudding Mill area
- Provide area-based and where applicable, site-specific guidance on how to bring forward a policy-compliant scheme within the area
- Assist developers in the early development of schemes by setting out broad matters for consideration likely to be raised within pre-application discussions
- Reflect work within the Pudding Mill Design Framework and, where applicable, bring elements of this into guidance
- The area affected by the SPD is that of the Pudding Mill Site Allocation (SA4.3) within the Legacy Corporation Local Plan (See Figure 1). Appendix 1 sets out the Site Allocation from the Local Plan.

Figure 1: Location of Pudding Mill Site Allocation Area

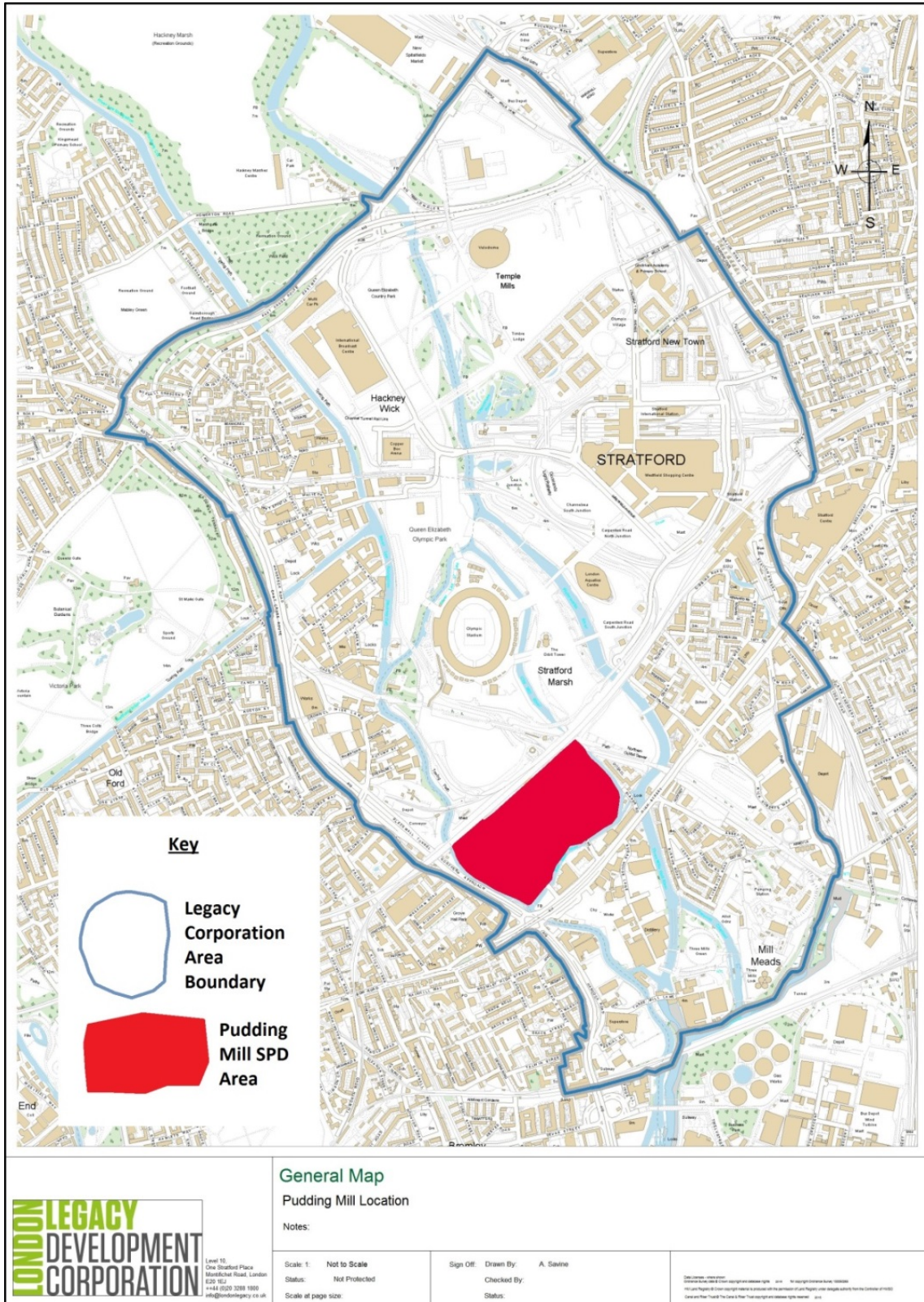
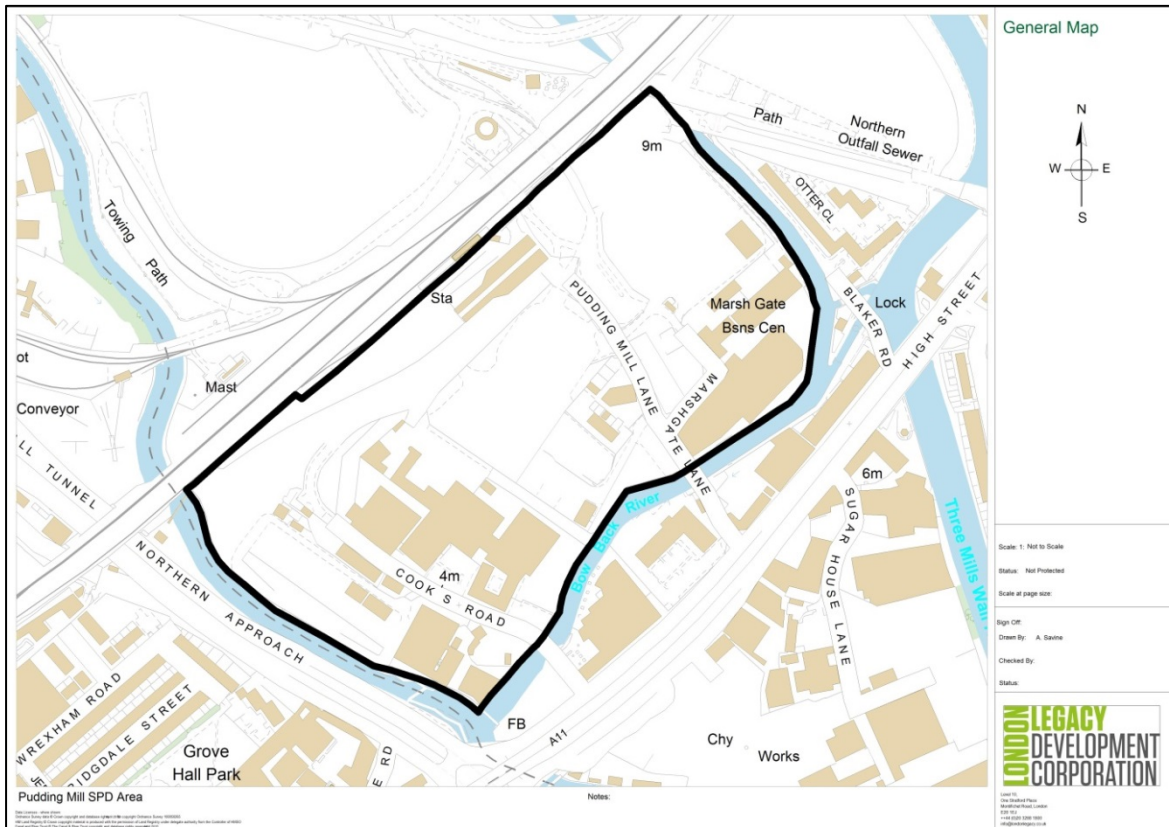


Figure 2: The Pudding Mill Site Allocation Area



1.6 The purpose of the SPD will be to provide further guidance on the Site Allocation within the Local Plan and the application of other key relevant policies within the Local Plan. It will not create any new policy or amend it. Table 1 sets out the proposed structure of the Pudding Mill SPD. Once produced, the a draft of the Pudding Mill SPD will be subject to formal public consultation.

Table 1: Proposed Pudding Mill SPD Structure

Chapter	Further guidance
1. Introduction	<ul style="list-style-type: none"> Purpose of SPD
2. Area profile	<ul style="list-style-type: none"> Site history Relationships with surrounding areas Site constraints (connections, contamination, flooding, air quality, etc) Access considerations
3. Overarching Local Plan policies	<ul style="list-style-type: none"> General policies and specific policies of particular relevance to Pudding Mill (e.g. location of business, housing size and mix, waterways, waste and implementation) How these policies will affect PM proposals (eg directing main town centre uses to Local Centre and heavier industrial uses to OIL; potential location for higher education, research and development; family housing)

Chapter	Further guidance
	<p>emphasis; influence of waterways, AQMA and flood patterns; site contamination mitigation requirements and potential loss of waste site)</p> <ul style="list-style-type: none"> • SA4.3 Pudding Mill • Policy objectives for SPD area (eg delivery of new, mixed use neighbourhood; mix of housing tenures and types, with a focus upon family housing; diverse range of employment types)
4. Locational influences on use and form	<ul style="list-style-type: none"> • Distinctions between Local Centre, Other Industrial Location and other parts of the site where some particular forms of development (use, type, size and format) may be more suitable and should be focussed • Potential options for appropriate responses
5. Integrating residential	<ul style="list-style-type: none"> • Distinctions within the site where some particular forms of housing development (size, type and mix) may be more suitable and should be focussed • Potential options for appropriate responses
6. Design	<ul style="list-style-type: none"> • Design influences (e.g. industrial heritage, waterways, flooding) • Design objectives for SPD area • Appropriate design responses (e.g. scale, height, massing, public realm, open space, landscaping, sustainable transport) • Examples of potential design responses
7. Street form and layout	<ul style="list-style-type: none"> • Aims and influences on street form (including uses, users, waterways) • How specific locations and uses affect street form (eg ground floor active uses, floor to ceiling heights, residential uses, waterways) • Examples of potential responses
8. Delivery and Implementation	<ul style="list-style-type: none"> • Required infrastructure, costs and timescale (e.g. new bridges, roads, community facilities) • Roles and responsibilities of the different delivery agencies (e.g. LLDC, LBN, TfL) • Delivery mechanisms (e.g. planning applications, conditions, S106) • Other projects and plans affecting area (DLR double-tracking, energy network connection) • Phasing of different scheme elements and infrastructure

SA/SEA of the Local Plan

- 1.7 The Local Plan has itself been the subject of Sustainability Appraisal (including Strategic Environmental Assessment) and this has included the Pudding Mill Site Allocation (SA4.3) and all other policies within the Local Plan, including its vision and objectives and sub area visions. This SA/SEA process was undertaken throughout

the Local Plan preparation process. The relevant Sustainability Appraisal documents and the Local Plan can be found on the Legacy Corporation website at <http://queenelizabetholympicpark.co.uk/planning-authority/planning-policy/supplementary-planning-documents> .

- 1.8 Paragraph 165 of the NPPF states “A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”. Paragraph 166 states that “Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken”.

National Planning Practice Guidance (NPPG) (February 2015)

- 1.9 This states that “Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.
- 1.10 A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.
- 1.11 Before deciding whether significant environment effects are likely, the local planning authority should take into account the criteria specified in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies.”

Screening Assessment

- 1.12 The document “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), sets out eight criteria that should be taken into account when screening a plan or programme to determine whether it will require SEA. The following tables provide the Legacy Corporation screening assessment using these criteria and the recommended methodology within the guide.

Table 2, application of the SEA Directive to the Proposed SPD

	Screening Question	Screening assessment
1.	Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament	Yes. The SPD will be prepared and adopted by the Legacy Corporation in its role as Local Planning Authority.

	Screening Question	Screening assessment
	or Government?	
2.	Is the SPD required by legislative, regulatory or administrative provisions?	No. Preparation of SPD is not a requirement of legislation, regulatory or administrative provisions.
3.	Is the SPD prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes. The SPD is intended to provide further guidance to the Legacy Corporation Local Plan which is the town planning policy framework for its area, including policy for land-use. The Local Plan has been subject to full Sustainability Appraisal (including SEA). The SPD will not create new policy or land-use designations.
4.	Will the SPD, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	No. The Local Plan was subject to screening for the need for assessment under the requirements of the Habitats Directive and it was concluded that such assessment was unnecessary. As the SPD will not change or add to policy, proposals or designations within the Local Plan it is not considered that further screening for such assessment is necessary as there would be no likely effects on European Sites.
5.	Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No. The policies, proposals and allocations that determine use within the SPD area have already been set within the Local Plan. There will be no aspect of the SPD which would modify the Local Plan.
6.	Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	No. This framework is already set within the Local Plan. The SPD will provide further guidance on the relevant policies, proposals or allocations within the Local Plan.
7.	Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	No.
8.	Is it likely to have a significant effect on the environment?	It is not likely that the SPD will have any significant effect on the Pudding Mill area or elsewhere that has not already been assessed through Sustainability Appraisal (including SEA) of the Local Plan. For example the assessment of the Site Allocation SA4.3 Pudding Mill concluded that there were predominantly positive and

	Screening Question	Screening assessment
		<p>no overall negative impacts when assessed against the Local Plan SA Objectives, while application of the other relevant policies within the Local Plan are likely to result overall in positive impacts. Local Plan policies that are likely to be specifically within the scope of the further guidance within the SPD are as follows:</p> <ul style="list-style-type: none"> • B.1 Location and maintenance of employment uses • B.2 Thriving town, neighbourhood and local centres • B.4 Providing low cost and managed workspace • H.1 Providing a mix of housing types • H.2 Delivering affordable housing • CI.1 Providing new and retaining existing community infrastructure • BN.2 Creating distinctive waterway environments • BN.4 Designing residential schemes • BN.10 Proposals for tall buildings • BN.11 Reducing noise and improving air quality • IN.2 Planning for waste • T.6 Facilitating Local Connectivity • S.2 Energy infrastructure in new development • S.8 Flood risk and sustainable drainage measures

Table 3, Determining the likely significance of effects

SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)		Comment
The characteristics of plans and programmes, having regard, in particular, to:		
1a)	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The SPD will provide further guidance to the policies, proposals and the allocations that are contained within the Local Plan and already set the framework for the development projects and activities that could occur within the Pudding Mill SPD area. The Local Plan as whole including the those parts that set a framework for

SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)		Comment
		<p>pudding Mill, have been fully assessed for the purposes of SA/SEA</p>
1b)	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	<p>The Pudding Mill SPD, in providing further guidance to the framework set within the Local Plan does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy, including the London Plan and NPPF.</p>
1c)	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>The Local Plan and other higher level policies set the context for achieving sustainable development for which the SPD will provide further guidance as to how this should be achieved. These options will not revisit or change the higher level policy requirements and in the case of the Local Plan, these have been subject of SA/SEA. The SA Report June 2014 concludes that the sub area sections of the Local Plan and the site allocations have a positive impact overall and a specifically positive impact for the majority of the SA objectives when assessed against these.</p>
1d)	Environmental problems relevant to the plan or programme	<p>The Local Plan SA did not identify any negative effects against the SA Objectives for the Pudding Mill site allocation for which the SPD will provide further guidance. For the SA Objective:</p> <p><i>“To protect and enhance the quality of water features and resources and reduce the risk of flooding”</i> a balance of potential positive and negative impacts was identified.</p> <p>It concludes that <i>“The allocation is located on site with areas of Flood Zone 3. Therefore increasing the amount of development within the sub area may exacerbate current issues. The allocation should therefore ensure that flood risk is not exacerbated. New development within the allocation would lead to an increased demand on water resources. Mitigation measures related to flood risk impacts and prevention of water pollution are included in S8. Water</i></p>

SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)		Comment
		<p><i>demand impacts are dealt through Policy S5.”</i></p> <p>Given the identification of mitigation through other policy requirements within the Local Plan in this instance, it is concluded that there are no identified problems relevant to the Pudding Mill site allocation that cannot be mitigated. This conclusion is also relevant to the SPD for Pudding Mill as the SPD will provide further guidance to and reinforce these policies.</p>
1e)	The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	It is unlikely that there would be any significant impact resulting from the further guidance for this site allocation area.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a)	The probability, duration, frequency and reversibility of the effects	The SPD will not provide guidance for a period longer than the period covered Local Plan. A Sustainability Appraisal was undertaken for the Local Plan which included the Pudding Mill site allocation which is the area that will be addressed by the SPD. The evidence to support the SA for the Local Plan continues to be up-to-date and looked at the probability, duration, frequency and reversibility of effects. The SA for the Local Plan noted that there is no clear reference to any requirements for the new development to enhance the local character. It is recognised that the SPD will provide further guidance on the design and the forms of development in the area which will result in higher level of certainty in the probability, duration, frequency and reversibility of any potential positive effects for SA objectives relating to townscape character and cultural heritage.
2b)	The cumulative nature of the effects	Cumulative effects of the Pudding Mill site allocation have been assessed within the SA for the Local Plan. There

SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)		Comment
		are no likely cumulative effects that would result from the production of the Pudding Mill SPD.
2c)	The trans-boundary nature of the effects	There will be no national trans boundary effects resulting from the Pudding Mill SPD given the highly localised nature of the area included and the types of development defined within the Local Plan. Local administrative trans boundary effects were considered as part of the SA/SEA of the Local Plan.
2d)	The risks to human health or the environment (e.g. due to accidents)	Human health effects were assessed in the SA for the Local Plan for site allocation 4.3 (SA Objective <i>To improve physical and mental health and wellbeing for all and reduce health inequalities</i>). No risks to human health or the environment were identified in relation to the site allocation area for Pudding Mill apart from that for flood risk which is addressed at 1b above. Further site specific guidance on influence of waterways, AQMA and flood patterns as well as site contamination mitigation requirements will be included in the SPD. That will provided more certainty in the prediction of effects already assessed in the SA for the Local Plan.
2e)	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The spatial extent of the SPD will not be larger than the area already covered in Local Plan. This is a small area at local level with the site allocation area being 15.68 hectares. It has a range of existing businesses but no existing residential population. The potential impact of the site allocation has been assessed as part of the SA/SEA of the Local Plan. The impact on existing businesses is mitigated by the assessed employment policies within the Local Plan. The magnitude of the impacts of the site allocation are therefore considered to be limited in this sense and positive in terms of the provision of a range of new homes and business space and a Local Centre within the site allocation area.
2f)	The value and vulnerability of the area likely to be affected due to:	The value and vulnerability of the area of the Pudding Mill SPD have been

SEA Directive Annex II: Criteria for determining likely significance of effects referred to in Article 3(5)		Comment
	I. special natural characteristics or cultural heritage, II. exceeded environmental quality standards or limit values III. intensive land-use	considered as part of the SA/SEA of the Local Plan, including the special natural characteristics and cultural heritage aspects, with the latter being of limited relevance. The intensiveness of the proposed use of the land is a factor information available at the time of the SA/SEA assessment and no significant impacts were identified in relation to this.
2g)	The effects on areas or landscapes which have a recognised national, Community or international protection status	There are no landscapes or areas of recognised national, community or international protection status that have been identified in relation to the Pudding Mill site allocation/SPD area. However, further site specific guidance on appropriate design is considered largely positive with regard to local character and townscape.

Conclusion

- 1.13 In considering the scope of the Pudding Mill SPD against the eight criteria from the guidance document “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005), it is concluded that as the SPD will not change or introduce new planning policy, proposals or allocations and that those on which it will rely are within the Local Plan which has already been subject to Sustainability Appraisal (including SEA), it is considered that SEA is unlikely to be required for the Pudding Mill SPD.

Section 2: SEA Determination Statement

Determination Statement on the need for Strategic Environmental Assessment (SEA) for the Pudding Mill Supplementary Planning Documents.

- 2.1 This section of the report constitutes the determination statement as to the need for a full SEA under Regulation 9(3) of the Environmental Assessment of Plans and Programmes Regulations 2004. This section sets out the results of the SEA screening process set out in Section 1 of this document for the LLDC's proposed Pudding Mill Supplementary Planning Document along with the reasoning behind the determination that an SEA is not required.

Consultation with Statutory Bodies

- 2.2 In accordance with the Regulations the Legacy Corporation as the Local Planning Authority for its area has consulted with specified environmental organisations (Natural England, English Heritage and the Environment Agency) and in light of the Duty to Cooperate has also consulted other relevant parties, to determine the need or otherwise for an SEA of the proposed Pudding Mill Supplementary Planning Document. The Legacy Corporation has determined that an SEA is not required in this instance and the reasons for reaching that conclusion are set out in (Section 1.13 of this document). The conclusion of this states

"In considering the scope of the Pudding Mill SPD against the eight criteria from the guidance document "A Practical Guide to the Strategic Environmental Assessment Directive" (ODPM, 2005), it is concluded that as the SPD will not change or introduce new planning policy, proposals or allocations and that those on which it will rely are within the Local Plan which has already been subject to Sustainability Appraisal (including SEA), it is considered that SEA is unlikely to be required for the Pudding Mill SPD."

- 2.3 The SEA Screening Statement was sent to the following organisations:
- The Historic Buildings and Monuments Commission for England (Historic England);
 - Natural England;
 - The Environment Agency;
 - Transport for London;
 - Greater London Authority (GLA);
 - Canal and River Trust;
 - Lee Valley Regional Park Authority
 - The London Boroughs of Hackney, Tower Hamlets, Waltham Forest and Newham

Their comments are summarised in Table 4 below:

Table 4 Summarised Consultation Responses

Organisation	Comment
Historic England	<p>On the basis of the information provided and in respect of the specific heritage impacts of the draft documents we agree that these supplement and provide further guidance on existing policies, and as such do not require SEA.</p> <p>It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.</p> <p>In addition we have previously provided comments in respect of the Hackney Wick Masterplan and are keen to continue to explore with the LLDC how the proposed SPD can balance ambitious growth plans within the conservation area and the desirability of ensuring new development is managed in a way that sustains the areas historic significance. We would therefore value the opportunity to discuss the SPD's further as they develop.</p>
Natural England	<p>Bromley-by-Bow; Hackney Wick and Fish Island; and Pudding Mill SEA screenings:</p> <p>Having checked the three SEA screening documents and referring back to the local plan which Natural England was consulted on, the finding that all three shouldn't require further assessment is agreeable. Given the lack of new policies within the SPDs and the fact that they are purely elaborating on already assessed wording within the Local Plan there wouldn't be any need to reassess these documents as they would fall under the prior assessment carried out for all of the policies within the main strategic Local Plan document.</p>
Environment Agency	<p>The three areas have the following main environmental characteristics in terms of flood risk and waterways:</p> <ul style="list-style-type: none"> • Bromley-By-Bow - This site is located adjacent to the Lee Navigation (Lower) and lies within flood zones 1, 2 and 3. • Hackney Wick & Fish Island - The Lea Navigation Hackney Cut and Hertford Union Canal criss-cross through this area. The site has significant areas of flood zones 2 and 3. • Pudding Mill - The site is bounded on three sides by the City Mill River, Bow Back River and the River Lea and almost the entire area falls within flood zone 2 and 3. <p>The purpose of the SPD is to provide further site-specific guidance based on the relevant policies in the Local Plan. At the Local Plan stage a Sequential Test and review of the existing Strategic Flood Risk Assessments were carried out to determine the overall impacts on flood risk and identify what mitigation measures are required. EA agree that although there may be some environmental effects of providing the site-specific guidance in the SPDs the assessment of environmental impact of the proposed site allocations has already been covered by the Sustainability Appraisal of the Local Plan, and we hope through discussions with us that the SPDs will assist in providing guidance that will enhance the waterways and reduce the</p>

Organisation	Comment
	<p>risk of flooding. It is therefore agreed that it's probably not necessary for an SEA to be carried out for the SPDs but ask that LLDC engage with the EA on the development of these SPDs so that the guidance relevant to the sites is appropriate, contributes to the overall sustainability and reduces vulnerability to climate change.</p> <p>Please note that given the presence of waterways on all three sites and the flood risk zones both policies BN2 'creating distinctive waterways' and S8 'flood risk and sustainable drainage measures' will be relevant as a baseline to provide further site-specific guidance. This is recognised for Hackney Wick & Fish Island and Pudding Mill but not specifically for Bromley-By-Bow (p.10).</p>
Lee Valley Regional Park Authority	There are no specific comments to raise in respect of the screening tests other than it should be noted that Bromley by Bow is located adjacent to the Regional Park at Three Mills. Development of this site will impact on the Park in terms of increased recreational use. This fact should be considered as part of the area profile. Design guidance and infrastructure provision needs to ensure safe routes into the Regional Park via Bromley by Bow are provided especially where these facilitate access via Bromley by Bow tube, cycleways and bus services. The riverside walk and associated open space will be critical to enhancing the boundary with the Regional Park along the Lee Navigation and ensuring development is set well back to protect the waterway. The Lee Valley Regional Park Area 1 Proposals, part of the Park Development Framework which cover this area will be adopted by the Authority in October and should be referred to as work on the SPDs progress.
LB Newham	Having reviewed the information given regarding the scope and purpose of the area based SPDs and the extracts from the recent full SA of your Local Plan, Newham would be satisfied that the approach outlined in the Screening Statements is appropriate.
LB Hackney	No comment
LB Waltham Forest	No comment
LB Tower Hamlets	No comment
Greater London Authority	No comment
Canal and River Trust	Having reviewed the SEA screening statement for each of these SPDs, the Trust agrees with the conclusion of the statements that a full SEA is not required.
Transport for London	No comment

Conclusion / Reasoning

- 2.4 The Pudding Mill SPD will supplement adopted policy in the LLDC's recently adopted Local Plan, focusing on implementation and evidence requirements. A screening of this document has led to the conclusion that the SPD is unlikely to have any significant environmental impacts and, therefore, that an SEA is not required. This conclusion has been verified through a consultation with the bodies identified in paragraph 2.3 above.
- 2.5 This section therefore constitutes the Legacy Corporation's 'Determination Statement' outlining the process that has led to the conclusion that SEA is not required.

The Statement of Determination

- 2.6 It is considered that a Strategic Environmental Assessment is NOT required for the Pudding Mill SPD for the reasons set out in paragraph 2.4 above.

Appendix 1: Local Plan Pudding Mill Site Allocation extract (extract from the Local Plan with post Examination modifications)¹

Site Allocation SA4.3: Pudding Mill

SITE ALLOCATION

A new medium-density, mixed-use area, including a significant and diverse element of new and replacement business floorspace, including spaces suitable for small- and medium-sized businesses; a new Local Centre adjacent to Pudding Mill Lane DLR Station and Pudding Mill Lane; new homes including a significant element of family housing; new Local Open Space, playspace and public realm. Cumulatively across the Pudding Mill Site Allocation, 25 per cent non-residential floorspace should be achieved, with a predominantly industrial floorspace use mix in the area to the west of Cooks Road and around the Crossrail portal.

- Proposals for development above 21 metres above ground level will only be acceptable subject to the provisions of Policy BN.10
- Non-residential uses should be focused along a new central east-west street
- The form of development should allow for improved east-west connections through the site
- Provision should be made for key connections, including new bus/cycle/

pedestrian connection from Stratford High Street to Marshgate Lane and a new pedestrian/cycle connection from Wrexham Road over the A12 and River Lea

- Land should be safeguarded for DLR North Route Double Tracking phase 2.
- Regard will need to be had to not prejudicing the operation of the safeguarded rail freight site to the west (for example by ensuring that noise sensitive uses are located away from the site).

Site Allocation SA4.3: Pudding Mill

KEY

- Proposed local open space
- Employment designation
- Local Centre
- Active frontage
- Principal connection improvement
- Playspace
- Key connections

Supporting development principles

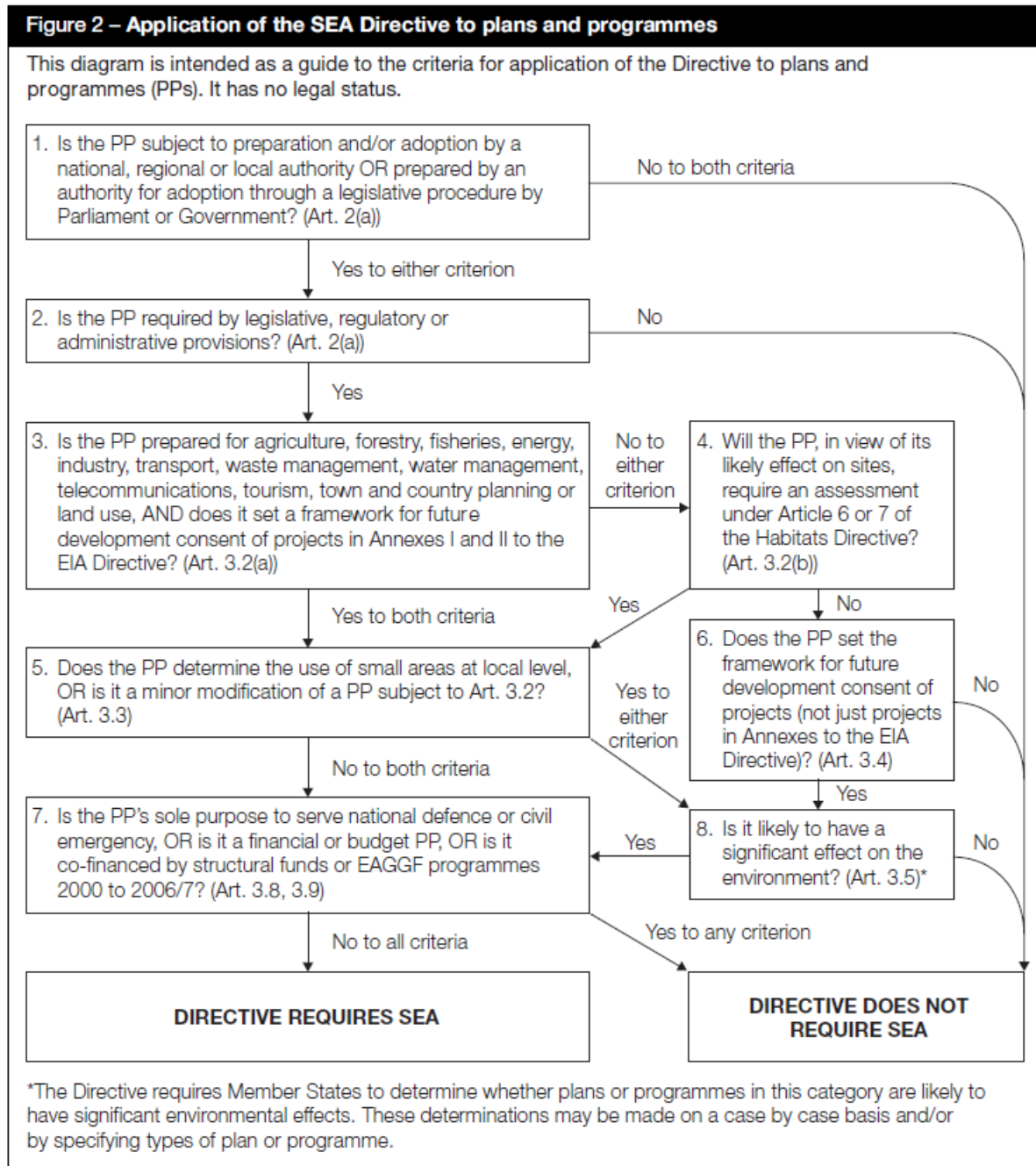
- Landowners will need to work together to bring forward comprehensive schemes that are capable of achieving the ambitions for development of the site allocation and delivering identified infrastructure needed for the site as a whole.
- Open Space/playspace needs to be provided alongside development and located within pockets across the site
- A new Local Centre should be brought forward adjacent to Pudding Mill DLR Station
- A significant proportion of family homes should be provided
- It would be appropriate to re-align Barbers Road to provide a dual fronted street and screening to the Crossrail site
- Other Industrial Location designation maintained along the western edge to form a buffer to A12 (see Policy B.1)

Phasing and implementation

- Delivery on site from 2015 onwards
- Lack of existing residential uses, amenity and limited connectivity will require early phases to

¹ Note that at the time of this consultation the Local Plan has yet to be adopted and therefore the site allocation extract may vary in its final adopted form.

Appendix 2: Figure 2 from “A Practical Guide to the Strategic Environmental Assessment”



Source: A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)

Appendix 3: Extract from SA/SEA of the Local Plan for Pudding Mill Site Allocation

SA Objectives	SA 4.1 Bromley-by-Bow		SA 4.2 Sugar House Lane		SA 4.3 Pudding Mill Lane	
	Impact	Comment	Impact	Comment	Impact	Comment
To reduce crime, disorder and fear of crime	+ S, M –LT D R M	New development within the allocation would contribute to improving the vitality of the area along with increasing natural surveillance. Both of which would benefit the SA Objective. The creation of safe pedestrian and cycle routes within the allocation would also support this SA Objective.	+ S, M –LT D R M	New development within the allocation would contribute to improving the vitality of the area along with increasing natural surveillance. Both of which would benefit the SA Objective.	+ S, M –LT D R M	New development within the allocation would contribute to improving the vitality of the area along with increasing natural surveillance. Both of which would benefit the SA Objective.
To improve levels of educational attainment for all age groups and all sectors of society	+ S, M –LT D R M	A new primary school would provide opportunities to meet the demands of the growing population in the area.	0	The Site Allocation does not include any proposals for new schools or education facilities. Therefore it is considered that it will not contribute to the achievement of the SA Objective at this stage. <i>However, it should be ensured that surrounding schools have capacity for the levels of growth proposed.</i>	0	The Site Allocation does not include any proposals for new schools or education facilities. Therefore it is considered that it would not contribute to the achievement of the SA Objective at this stage. <i>However, it should be ensured that surrounding schools have capacity for the levels of growth proposed.</i>
To improve physical and mental health and wellbeing for all and reduce health inequalities	+ S, M –LT I R M	The SA Objective would be achieved indirectly through providing new open space and riverside walkway, community space and new cycle and pedestrian routes. In addition, more employment opportunities within the new District Centre would have an indirect positive	+ S, M –LT D/I M C	Creating new areas of high quality open space along with new pedestrian access within the allocation would contribute to promoting healthy lifestyles.	+ S, M –LT D/I M C	Creating new areas of high quality open / play space along with new bus/cycle/pedestrian connections within the allocation would contribute to promoting healthy lifestyles.

	SA 4.1 Bromley-by-Bow		SA 4.2 Sugar House Lane		SA 4.3 Pudding Mill Lane	
SA Objectives	Impact	Comment	Impact	Comment	Impact	Comment
		effect on mental health and well-being of the population.				
To ensure housing provision meets local needs	+ + S, M –LT D R M	Planning permission has been granted for residential units within the allocation with a significant element of family housing which would directly contribute to the achievement of the SA Objective as the need for this type of dwellings has been identified.	+ S, M –LT D R M	The allocation would provide up to 1200 new homes with a significant element of family housing which would directly contribute to the achievement of the SA Objective as the need for this type of dwellings has been identified. <i>However it is not identified what proportion would be affordable.</i>	+ S, M –LT D R M	The area has planning permission for residential units with a significant element of family housing which would directly contribute to the achievement of the SA Objective as the need for this type of dwellings has already been identified. <i>However it is not identified what proportion would be affordable and numbers are not provided.</i>
To improve sustainable access to jobs, basic goods, services and amenities for all groups	+ S, M –LT D R M	Improvements to Bromley-by-Bow Station and the underpass that links the station to the east side of the A12 would improve the access and connectivity across the area. In addition, new riverside walkway would provide opportunities for local residents to access the waterways in the area via walking and cycling.	+ S, M –LT D R M	Access to public transport is available at Bromley-by-Bow Station and Pudding Mill DLR Station. The area is also well served by local bus services along the main routes in the highway network. The policy would contribute to the achievement of the SA Objective through the provision of new pedestrian, cycling and vehicular routes within the new residential areas. <i>It would be beneficial to include any opportunities to improve connections across the waterways in the area and refer</i>	+ S, M –LT D R M	New bus/cycle/pedestrian connections would improve the local connectivity across the area and will encourage the use of more sustainable modes of transport. This would be further supported by the new station at Pudding Mill.

	SA 4.1 Bromley-by-Bow		SA 4.2 Sugar House Lane		SA 4.3 Pudding Mill Lane	
SA Objectives	Impact	Comment	Impact	Comment	Impact	Comment
				<i>to the relevant policy in the plan.</i>		
To reduce poverty and social exclusion whilst promoting social inclusiveness and equality	+ S, M –LT D R M	Poverty and deprivation levels may be reduced through improved connectivity, improved transport infrastructure and better access to community facilities, as well as new commercial / employment opportunities, and new District Centre accessible via walking / cycling. New opportunities could offer benefits to those from more deprived communities In the area.	+ S, M –LT D R M	Poverty and deprivation levels may be reduced through improved connectivity, improved transport infrastructure and better access to community facilities, as well as new commercial / employment opportunities within the allocation.	+ S, M –LT D R M	Poverty and deprivation levels may be reduced through improved connectivity, improved transport infrastructure, the creation of new high quality open space along with better access to community facilities.
To encourage sustainable economic growth, inclusion and business development	+ S, M –LT D R M	The SA Objective would be achieved through the provision of retail, employment and office floorspace and the creation of a new District centre.	+ + S, M –LT D R M	The site strongly supports business and retail space to develop. In addition to the amount of allocated business floorspace, there is also potential to provide land for temporary use to meet any demand for short-term business space.	+ S, M –LT D R M	The SA Objective would be achieved through the provision of retail, employment and office floorspace.
To increase employment opportunities for all residents in the local area	+ S, M –LT D R M	Development proposals would generate a significant number of construction and operational phase jobs. In addition, employment opportunities in retail and leisure services associated with the new District Centre would become available.	+ S, M –LT D R M	Development proposals would generate a significant number of construction and operational phase jobs. In addition, employment opportunities would arise as a result of increased business and commercial activity and increased	+ S, M –LT D R M	Development proposals would generate a significant number of construction and operational phase jobs.

	SA 4.1 Bromley-by-Bow		SA 4.2 Sugar House Lane		SA 4.3 Pudding Mill Lane	
SA Objectives	Impact	Comment	Impact	Comment	Impact	Comment
				employment space.		
To protect and enhance biodiversity	0	The developments within the site will be on previously developed land (previous industrial use) therefore it is not considered that any valuable habitats would be affected. <i>It would be beneficial if any contaminated land is remediated before using the land for any other purposes. There would also be opportunities for habitat enhancement as part of new open space proposals.</i>	0	The developments within the site would be on previously developed land (previous industrial use) therefore it is not considered that any valuable habitats will be affected. <i>It would be beneficial if any contaminated land is remediated before using the land for any other purposes. There would also be opportunities for habitat enhancement as part of new open space proposals.</i>	+ S, M –LT D R M	The creation of new open space may have a positive effect on biodiversity through the creation of new habitats.
To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	+ S, M –LT D R M	The allocation makes a commitment to ensuring that new development responds positively to the adjacent waterways and listed buildings and conservation area at Three Mills.	+ + S, M –LT D R M	The allocation ensures that the areas character which is defined by its unique natural environment and historic industrial legacy that includes extensive canal and river frontage, robust yet adaptable buildings and intricate yards and passages is preserved.	0	There is no clear reference to any requirements for the new development to enhance the local character. <i>It would be beneficial to cross reference to the relevant policies in the plan.</i>
To protect and enhance the cultural heritage resource	+ S, M –LT D R M	Although there are no listed buildings or conservation areas within the allocation itself. The commitment to ensuring that new development responds positively to the adjacent waterways and	+ + S, M –LT D R M	The allocation ensures that any proposals that come forward respect the conservation area designations, both of the Sugar House Lane Conservation Area which is wholly within the site,	0	There is no clear relationship between the policy and / or the achievement of the SA Objective or the relationship is negligible

	SA 4.1 Bromley-by-Bow		SA 4.2 Sugar House Lane		SA 4.3 Pudding Mill Lane	
SA Objectives	Impact	Comment	Impact	Comment	Impact	Comment
		listed buildings and conservation area at Three Mills would contribute to the achievement of the SA Objective.		and the Three Mills Conservation area, part of which falls within the site allocation area. The settings of the grade I, II* and II buildings at Three Mills would also be protected.		
To protect and enhance the quality of water features and resources and reduce the risk of flooding	+/- S, M –LT D R M C	The allocation is located on site with areas of Flood Zones 1,2 and 3. Therefore increasing the amount of development within the sub area may exacerbate current issues. <i>The allocation should therefore ensure that flood risk is not exacerbated.</i> New development within the allocation would lead to an increased demand on water resources. <i>Mitigation measures related to flood risk impacts and prevention of water pollution are included in S8. Water demand impacts are dealt through Policy S5.</i>	+/- S, M –LT D R M C	The allocation is located on site with areas of Flood Zones 2 and 3. Therefore increasing the amount of development within the sub area may exacerbate current issues. <i>The allocation should therefore ensure that flood risk is not exacerbated.</i> New development within the allocation would lead to an increased demand on water resources. <i>Mitigation measures related to flood risk impacts and prevention of water pollution are included in S8. Water demand impacts are dealt through Policy S5.</i>	+/- S, M –LT D R M C	The allocation is located on site with areas of Flood Zone 3. Therefore increasing the amount of development within the sub area may exacerbate current issues. <i>The allocation should therefore ensure that flood risk is not exacerbated.</i> New development within the allocation would lead to an increased demand on water resources. <i>Mitigation measures related to flood risk impacts and prevention of water pollution are included in S8. Water demand impacts are dealt through Policy S5.</i>
To limit and adapt to climate change	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to reducing carbon emissions	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to reducing carbon emissions	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to reducing carbon emissions

	SA 4.1 Bromley-by-Bow		SA 4.2 Sugar House Lane		SA 4.3 Pudding Mill Lane	
SA Objectives	Impact	Comment	Impact	Comment	Impact	Comment
		through reducing the need to travel by private car (over the long term). <i>The Site Allocation should include measures to reduce the risk of flooding with cross-referencing to the relevant flood risk policy.</i>		through reducing the need to travel by private car (over the long term). <i>The Site Allocation should include measures to reduce the risk of flooding with cross-referencing to the relevant flood risk policy.</i>		through reducing the need to travel by private car (over the long term). <i>The Site Allocation should include measures to reduce the risk of flooding with cross-referencing to the relevant flood risk policy.</i>
To protect and improve air quality	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to improving local air quality through reducing the need to travel by private car (over the long term).	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to improving local air quality through reducing the need to travel by private car (over the long term).	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to improving local air quality through reducing the need to travel by private car (over the long term).
To ensure sustainable use of natural resources	+/- S,M –LT D/I R M C	The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. However, it should be noted that development would be located on previously developed land which represents a sustainable use of land resources. <i>Reuse/recycle of materials should be sought where possible.</i>	+/- S,M –LT D/I R M C	The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. However, it should be noted that development would be located on previously developed land which represents a sustainable use of land resources. <i>Reuse/recycle of materials should be sought where possible.</i>	+/- S,M –LT D/I R M C	The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. However, it should be noted that development would be located on previously developed land which represents a sustainable use of land resources. <i>Reuse/recycle of materials should be sought where possible.</i>

SA 4.1 Bromley-by-Bow		
SA Objectives	Impact	Comment
To reduce crime, disorder and fear of crime	+ S, M –LT D R M	New development within the allocation would contribute to improving the vitality of the area along with increasing natural surveillance. Both of which would benefit the SA Objective. The creation of safe pedestrian and cycle routes within the allocation would also support this SA Objective.
To improve levels of educational attainment for all age groups and all sectors of society	+ S, M –LT D R M	A new primary school would provide opportunities to meet the demands of the growing population in the area.
To improve physical and mental health and wellbeing for all and reduce health inequalities	+ S, M –LT I R M	The SA Objective would be achieved indirectly through providing new open space and riverside walkway, community space and new cycle and pedestrian routes. In addition, more employment opportunities within the new District Centre would have an indirect positive effect on mental health and well-being of the population.
To ensure housing provision meets local needs	+ + S, M –LT D R M	Planning permission has been granted for residential units within the allocation with a significant element of family housing which would directly contribute to the achievement of the SA Objective as the need for this type of dwellings has been identified.
To improve sustainable access to jobs, basic goods, services and amenities for all groups	+ S, M –LT D R M	Improvements to Bromley-by-Bow Station and the underpass that links the station to the east side of the A12 would improve the access and connectivity across the area. In addition, new riverside walkway would provide opportunities for local residents to access the waterways in the area via walking and cycling.
To reduce poverty and social exclusion whilst promoting social inclusiveness and equality	+ S, M –LT D R M	Poverty and deprivation levels may be reduced through improved connectivity, improved transport infrastructure and better access to community facilities, as well as new commercial / employment opportunities, and new District Centre accessible via walking / cycling. New opportunities could offer benefits to those from more deprived communities In the area.

SA 4.1 Bromley-by-Bow		
SA Objectives	Impact	Comment
To encourage sustainable economic growth, inclusion and business development	+ S, M –LT D R M	The SA Objective would be achieved through the provision of retail, employment and office floorspace and the creation of a new District centre.
To increase employment opportunities for all residents in the local area	+ S, M –LT D R M	Development proposals would generate a significant number of construction and operational phase jobs. In addition, employment opportunities in retail and leisure services associated with the new District Centre would become available.
To protect and enhance biodiversity	0	The developments within the site will be on previously developed land (previous industrial use) therefore it is not considered that any valuable habitats would be affected. <i>It would be beneficial if any contaminated land is remediated before using the land for any other purposes. There would also be opportunities for habitat enhancement as part of new open space proposals.</i>
To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	+ S, M –LT D R M	The allocation makes a commitment to ensuring that new development responds positively to the adjacent waterways and listed buildings and conservation area at Three Mills.
To protect and enhance the cultural heritage resource	+ S, M –LT D R M	Although there are no listed buildings or conservation areas within the allocation itself. The commitment to ensuring that new development responds positively to the adjacent waterways and listed buildings and conservation area at Three Mills would contribute to the achievement of the SA Objective.
To protect and enhance the quality of water features and resources and reduce the risk of flooding	+/- S, M –LT D R M C	The allocation is located on site with areas of Flood Zones 1,2 and 3. Therefore increasing the amount of development within the sub area may exacerbate current issues. <i>The allocation should therefore ensure that flood risk is not exacerbated.</i> New development within the allocation would lead to an increased demand on water resources.

SA 4.1 Bromley-by-Bow		
SA Objectives	Impact	Comment
		<i>Mitigation measures related to flood risk impacts and prevention of water pollution are included in S8. Water demand impacts are dealt through Policy S5.</i>
To limit and adapt to climate change	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to reducing carbon emissions through reducing the need to travel by private car (over the long term). <i>The Site Allocation should include measures to reduce the risk of flooding with cross-referencing to the relevant flood risk policy.</i>
To protect and improve air quality	+ LT D R M C	Sustainable modes of transport (i.e. walking) to access local services / facilities and improved local connectivity may contribute to improving local air quality through reducing the need to travel by private car (over the long term).
To ensure sustainable use of natural resources	+/- S,M –LT D/I R M C	The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. However, it should be noted that development would be located on previously developed land which represents a sustainable use of land resources. <i>Reuse/recycle of materials should be sought where possible.</i>