

A Summary of the Findings of the Sustainability Appraisal of the Core
Strategy Proposed Submission Development Plan Document June 2009

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A Summary of the Findings of the Sustainability Appraisal of the Core Strategy Proposed Submission Development Plan Document June 2009

1.1 Introduction

- A Sustainability Appraisal (SA) Report seeks to identify the economic, social and environmental impacts a plan or programme and suggests ways to avoid or minimise negative impacts and maximise positive ones. This note summarises the SA assessment findings by chapter of the Core Strategy Proposed Submission Development Plan Document, June 2009.

1.2 Assessment Methodology

- An appraisal matrix was formulated to assess each plan policy. The matrices contain the 20 Sustainability Appraisal objectives (please see figure 1 below for these). The matrix was also divided in 16 main topic areas: population, biodiversity, air, climate, human health, crime & safety, housing, waste, transport, soil, water & noise, landscape & townscape, cultural heritage, poverty & social exclusion, equalities, employment and skills and the economy. The predicted effects of each policy were denoted using the scoring set out in Figure. 2. Please see Appendices 2-7 of the SA Report to view the full assessment matrices.

Figure 1: Hackney's Sustainability Appraisal Objectives

	Sustainability Objectives
1	To protect and enhance the biodiversity, flora and fauna of the borough
2	To ensure efficient use of natural resources
3	To improve air quality
4	To reduce noise pollution
5	To minimize flood risk and encourage Sustainable Urban Drainage Systems (SUDS) for new developments
6	To reduce the need to travel and encourage use of public transport including walking and cycling

7	To reduce greenhouse gas emissions and promote the efficient use of energy in all activities
8	To promote sustainable design
9	To protect and enhance the borough's historic environment and preserve the archaeological aspects of the borough.
10	To reduce poverty and social exclusion and promote cultural diversity
11	To maintain and enhance Metropolitan Open Land and open spaces and enhance the landscape character
12	To improve the health of the people and promote healthy lifestyle
13	To improve educational attainment and the skill level of the population
14	To reduce crime, anti-social behaviour and fear of the crime in the borough
15	To increase the number of decent and affordable houses
16	To provide access to an adequate range of support and community facilities
17	To encourage complementary activities and land uses together to make more efficient and effective use of land
18	To minimize waste and maximize recycling in the borough
19	To promote sustainable economic growth
20	To generate employment opportunities for everyone

Figure 2: Assessment Scoring Key

Symbol	Meaning
+	The option/policy will result on a positive impact on the SA objective and related topic area.
+/?	The impact on the SA objective & related topic area is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
0	Neutral or negligible effect.
-/?	The impact on the SA objective and related topic area is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
-	Option will result in a significant negative impact on the SA objective and related topic area.
?	The relationship between the option/policy and the SA objective and related topic area is unknown, or there is not enough information to make an assessment.

1.3 Delivering Sustainable Growth

Figure 3: Sustainability Appraisal Findings Summary – Delivering Sustainable Growth

	Population	Biodiversity	Soil, Water & Noise	Air	Transport	Climate	Cultural Heritage	Equalities	Poverty & social exclusion	Human Health	Crime & safety	Housing	Landscape & townscape	Waste	Economy	Employment and Skills
1a. Growth Locations: Dalston	0	-/?	-/?	-/?	+/?	-/?	-/?	+/?	+/?	-/?	+/?	+/?	-/?	-/?	+	+
1b. Growth Locations: Hackney Central	+	-/?	-/?	-/?	+/?	-/?	-/?	+/?	+/?	+/?	+/?	+/?	-/?	-/?	+/?	+/?
2. Improved Railway Corridor	0	-/?	-/?	-/?	+	-/?	-/?	+/?	+/?	-/?	+/?	+/?	+/?	-/?	+/?	+/?
3. South Shoreditch-City Fringe	0	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
4. Woodberry Down	0	-/?	-/?	-/?	-/?	-/?	-/?	+/?	+/?	+/?	+/?	+/?	+/?	-/?	-/?	-/?
5. Hackney Wick	0	0	-	-	+/?	-	-/?	-	-	-	+/?	+/?	+/?	0	+/?	+/?
6. Transport	0	+/?	+/?	+/?	+/?	+/?	-/?	+/?	+/?	+/?	+/?	+/?	-/?	+/?	+/?	+/?
7. Locating Infrastructure	0	+/?	+/?	+/?	+/?	+/?	-/?	+/?	+/?	+/?	0	+/?	+/?	+/?	+/?	0

Core Strategy Policy 1: Growth Locations – Dalston

Summary of effects

- Since the Preferred Options Stage April, 2008 Preferred Policy Option (PPO) 38 Dalston has been cut down to a sentence as part of Core Strategy Policy 1 and is later expanded in paragraph four of Core Strategy Policy 14 Town Centres. This section focuses on the implications of Policy 1. The Town Centres Policy 14 have also been subject to a separate appraisal.
- The policy option will result in a significant positive impact on the topic areas and related SA objectives for the economy and employment and skills.
- Potential negative effects on biodiversity, air, climate, cultural heritage, human health, landscape & townscape and waste if the policy is not implemented sensitively and in combination with the supporting policies in the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability Chapters. The potential negative environmental impacts are generally attributed to the increase in densities anticipated in the area.
- Neutral effects on population.
- Potential positive effects on transport, equalities, crime & safety, poverty & social exclusion and housing if the policy is implemented correctly.

Difficulties encountered/assumptions made

- Presumption that the Combined Heat and Power (CHP), retail clusters and library can be delivered by the Area Action Plan (AAP) alone without reference in the strategic policy.
- Assumption that the policies in the Cleaner and Greener, Supporting Neighbourhoods and Climate Change Chapters will mitigate adverse impacts of this growth.

Avoidance/mitigation

- To further improve the performance of this policy additional alignment and specific reference to the boundary, objectives, principles and aims set out in the Dalston AAP which has been consulted upon at the preferred options stage.
- Cross reference to the important mitigating policies in the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability Chapters.

Measures taken into account

- The boundary of the areas was updated in line with the Dalston AAP. The Dalston Curve is highlighted on the proposals map as an area of open space. Further joint working with the Dalston AAP team was carried out.

Core Strategy Policy 1: Growth Locations - Hackney Central

Summary of effects

- The Preferred Policy Options SA identified generally positive or neutral effects. With one potential adverse impact on noise. Since the Preferred Options Stage, April, 2008, The Hackney Central Preferred Policy Option (PPO) 39 has been cut down. This policy is now dealt with within the town centre section of the Proposed Submission Core Strategy 1 Growth Locations and in paragraph four of Core Strategy Policy 13 Town Centres.
- The Preferred Options SA recognised the impacts on noise will be mitigated at the development management stage of the implementation of this policy. The potential impacts on noise could not be ruled out at this stage of the process via strategic changes to the policy.
- The potential negative effects on biodiversity, soil, water & noise, air, climate, cultural heritage, landscape & townscape and waste especially if the policy is not implemented alongside the principles set out in the Cleaner, Greener and Safer and Climate Change and Environmental Sustainability Chapters.
- It was considered that the policy option will result in a significant positive impact on the transport topic area and related SA/SEA objectives.
- Potential positive effects if the policy is implemented correctly on equalities, poverty & social exclusion, human health, crime & safety, housing, economy and employment and skills.

Difficulties encountered/assumptions made

- The assumption is, further to the London Plan on Town Centre Growth A1.1 that Hackney Central should be a primary focus of growth. Equally however regional guidance supports the same level of growth in Stoke Newington and Finsbury Park. Although these are promoted in the Submission Core Strategy Policy 14 Town Centres, they also warrant mention in the primary locations for growth unless there is evidence to illustrate that there is less of a priority for development here.
- Full alignment to the principles and objectives set out in the Hackney Central AAP.
- The policies will be implemented along with the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability policies to deliver sustainable growth.

Avoidance/mitigation

- Development Management DPD on a site level to consider impacts on noise.
- The Hackney Central AAP has a different boundary that needs to be updated.

- The environmental effects should be mitigated by the high quality sustainable design policies and biodiversity policy in the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability. The Supporting Neighbourhoods Chapter aims to secure adequate provision of social and health facilities.
- Although Hackney Central this is the civic heart of the borough growth potential may not be realised without the further promotion of commercial and retail growth.
- Reference to CHP

Measures taken into account

- Alterations to the boundary in the proposal map to represent AAP boundary area.
- Additional reference to cultural development in Hackney Central.
- CHP is not specifically referred to.

Core Strategy Policy 1: Growth Locations & Policy 2: Improved Railway Corridors

Summary of effects

- Preferred Policy Option 11, April 2008 focused on optimising upon the planned improvements to the East London Line and North London Line Networks. The policy wording has changed. The Core Strategy Policy 1 has been refined to more clearly highlight the intensification of use around the new proposed East London Line Stations. The assessment findings of PPO11 did not identify any adverse or significant adverse impacts. This element of the policy was reassessed to ensure that any likely significant effects could be taken into account.
- Neutral effects on population.
- Potential negative effects if not implemented correctly and in combination with the Cleaner, Greener and Safer and Climate Change and Environmental Sustainability Chapters upon biodiversity, soil, water & noise, air, climate, cultural heritage, human health and waste.
- Significant positive effects on transport and employment and skills.
- Positive effects anticipated if implemented correctly on equalities, poverty & social exclusion, crime & safety, housing, landscape & townscape, economy.

Difficulties encountered/assumptions made

- Lack of evidence on the role of the arts and cultural activities could play especially along the railway arches which run parallel to the East London Line Corridor. The viability of industrial uses along the arches to support the growing economy is not clear. There is evidence that industrial uses are a declining sector.
- Requirement for more research on the economic potential of cultural industries in South Shoreditch and along the East London Line Corridor.

Avoidance/mitigation

- Further evidence on the need to protect industrial locations and the marriage with commercial, leisure and cultural uses. Clarity on the inset map to reflect the policy position and to outline it as an area of growth more clearly.
- Name the new stations which are due to be built by 2010 approx on the spatial vision map -Hoxton, Haggerston, Dalston Junction and Canonbury and indicate where these will fit in the tube map.

Measures taken into account

- The changes to the policy during the preferred options to the submission Core Strategy stage removes specific reference to 'mainly industrial uses' and leaves the position for the intensification of uses in this area more broad.
- Positive if implemented correctly on equalities, poverty & social exclusion, crime & safety, housing, landscape & townscape, economy.

Core Strategy Policy 1: Growth Locations & Policy 4: Woodberry Down New Community

Summary of effects

- The Preferred Option (PPO) 45 Woodberry Down did not identify any significant adverse effects however it did suggest potential negative effects in relation to the economy, employment and skills, transport, air quality, ambient noise, transport and accessibility and climate change. The policy wording in Core Strategy Policy 1 makes reference to a new community and this is later expanded in Core Strategy Policy 4.
- Neutral effects on population.
- Positive if implemented correctly on equalities, poverty & social exclusion, human health, crime & safety, housing and landscape & townscape.
- The proposed submission SA stage could not rule out potential negative effects on the air, biodiversity, soil, water & noise, climate, transport, cultural heritage if the policy is not implemented correctly.

- In addition potential negative effects on the economy and employment and skills SA/SEA objectives and related topic areas if the policy is not implemented closely with the emerging Manor House AAP which sets out the vision for economic growth in the area.

Difficulties encountered/assumptions made

- Measures will need to be taken at the Masterplan stage to ensure an appropriate balance is met between the provision of houses and access to jobs and services.

Avoidance/mitigation

- Potential significant effects if this policy is not integrated with the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability policies to deliver sustainable growth.
- More reference to Manor House objectives that will support this development.
- Strategic policy support for the CHP, community infrastructure including the health centre, two new schools, enhanced community facilities and the new commercial component at Manor house.
- Reference to the commitment of new transport infrastructure such as new bus routes etc to support the development.

Measures taken into account

- The final revisions to the policy do refer to Manor House which is an Area Action Plan currently underway and due for public consultation in November 2009. Specific reference to CHP, new health centre and community facilities have not been added.
- Consultation was undertaken with the EA and Natural England on the identified potential adverse effects and measure were taken to further green our Climate Change and Sustainability and Cleaner, Greener and Safer (including the waterfront development policy) Chapters to counteract those identified.
- Reference to the transport connections of the Piccadilly Line Tube Station at Manor House has been included in the supporting text.

Core Strategy Policy 1: Growth Locations & Policy 5: Hackney Wick New Community

Summary of effects

- Preferred Policy Options (PPO) 42 on Hackney Wick has been revised. It is described as a new community in Core Strategy Policy 1 and later subject to Policy 5 Hackney Wick New Community. Following the initial assessment of the policy meetings and discussion have been undertaken with the Environment Agency. The policy has been assessed alongside the Strategic Flood Risk Assessment Sequential Test, July 2009.

- Neutral effects on population, waste and biodiversity.
- Potential significant adverse effects on air, climate, soil, water & noise equalities, poverty & social exclusion, human health topic areas from inappropriate development in areas at risk of flooding were identified. Flooding can cause damage to property, injuries and loss of human life. Hackney has vulnerable minority ethnic groups. It is important that a strong position is taken to ensure that the quality of life for Hackney's residents is improved and that their properties, possessions and lives are not placed in identified areas of risk. It is strongly recommended that areas located in Flood Zone 3 be designated for less vulnerable uses such as employment and that any residential areas are located further north. Significant adverse effects may be incurred by the removal of the industrial employment locations there which our economic evidence base demonstrates that that these uses support the population in the area.
- Potential negative effects if not implemented sensitively on cultural heritage.
- Potential positive effects if implemented effectively and sensitively on crime & safety, housing, landscape & townscape, transport, economy and employment and skills.

Difficulties encountered/assumptions made

- The regional policy position designated areas within Hackney Wick as Strategic Employment Locations however the Olympic Legacy Development Framework promotes a more of a housing focus.
- Discussions with the Environment Agency on strategic solutions to manage the flood risk in the area. Detailed assessments still need to be carried out.

Measures taken into account

- The SFRA Sequential Test has been carried out to support the plan. Extensive consultation with the Environment Agency who have noted their support for the position in Hackney Wick in a formal letter. The SFRA Level 2, Surface Water Management Plan and Options Mitigation Report are currently being commissioned.

Measures taken into account

- Hackney Wick Policy has been changed to take account of the Environment Agencies comments further to meetings hosted in Hackney spring-summer 2009. Further SFRA assessments have been commissioned. The SFRA Sequential Test has been carried out to support the strategic position in the Hackney Wick area. Further to consultation with the Environment Agency they have noted their support for the position in Hackney Wick in a formal letter. It is however required that The Hackney Wick Fish Island AAP is subject to more in depth analysis.

- The revised policy includes specific reference to the potential significant adverse effects if inappropriate development for Hackney is located in areas at medium to high risk of flooding.

Core Strategy Policy 1: Growth Locations & Policy 3: City Fringe South Shoreditch

Summary of effects

- Preferred Policy Option (PPO) 44, April, 2008 set out the position for South Shoreditch. The Submission Policy 1 Highlights the City Fringe - Shoreditch as part of London's Central Activities Zone. This is later expanded in Core Strategy Policy 3.
- Neutral effects on population.
- Potential negative effects if not implemented correctly on the economy and employment and skills. It was identified that the benefits of economic growth may not be fully realised if regeneration in this area does not take full advantage of growing industries including arts and cultural. Strategic industrial uses are still protected in the Shoreditch area however demand for these may decline. An economic study on the predicted growth of new industries (especially arts and cultural) in this area is recommended.
- In addition potential negative effects if not implemented correctly on equalities, poverty & social exclusion, human health, crime & safety, housing, landscape & townscape, biodiversity, waste, soil, water & noise, air, climate and cultural heritage.

Difficulties encountered/assumptions made

- Assumption will be implemented through the City Fringe Opportunity Area Planning Framework and South Shoreditch SPD however this is not cross referred to strongly in the supporting text.
- Requirement for more research on the economic potential of cultural industries in South Shoreditch and along the East London Line Corridor.

Avoidance/mitigation

- A lot of the growth in Shoreditch is integrated with that of Islington, The City and Tower Hamlets. Reference to the City Fringe Opportunity Area Planning Framework is required.
- The arts are an important part of the development in Shoreditch. Our evidence shows a significant increase in arts and cultural activity in Shoreditch as well as the night- time economy. Although positive impacts in relation to the economy have been identified specific reference to the 'arts' in the policy is recommended.
- Integration/cross reference to the Cleaner, Greener and Safer and Climate Change Chapters.
- Protect strategic views from tall buildings development.

Measures taken into account

- The revisions to the supporting text outline that South Shoreditch is a primary location for Hackney's growing cultural and leisure activities accommodating art galleries, design studios, media and related businesses within the Shoreditch triangle in areas such as Hoxton Square, Great Eastern Street, Old Street and Shoreditch high Street.
- Additional focus on the commercial and offices uses in South Shoreditch.
- Links made to the City Fringe Opportunity Area Planning Framework and South Shoreditch SPD.
- Reference to the protection of strategic views.

Core Strategy Policy 6: Transport

Summary of effects

- The Preferred Policy Options (PPO's) 29, 30 and 31 on transport have been revised to form Core Strategy Policy 6: Transport, Core Strategy 7: Locating Infrastructure and Core Strategy 33 Promoting Sustainable Transport. This summary refers to Transport Policy 6.
- Potential positive effects if the policy is implemented correctly on biodiversity, soil, water & noise, air, transport, climate, equalities, poverty & social exclusion, crime & safety, human health, housing, transport, waste, economy and employment & skills.
- The Habitats Regulations Assessment noted possible in combination effects of air pollutants generated by increases to the use of the private car. It notes that the A503 (Forest Road) passes through the SPA, separating the two components of Walthamstow Reservoirs SSSI and can expect to receive higher volumes of traffic as a result of 10,850 new homes within Hackney. It notes that increasing nitrogen deposition due to increased road traffic associated can be expected to contribute to deteriorating air quality in a European site that is already exceeding the predicted damage thresholds. However, it sets out in page 28 that Policy Promoting Sustainable Transport seeks to minimise the contribution of new development to deteriorating air quality as much as possible mitigating this potential effect.
- Potential negative effects if not implemented correctly on cultural heritage and landscape & townscape.
- The Equalities Impacts Assessment, (EqIA) out "Reducing car based travel and on site parking whilst promoting walking and cycling could have a negative impact on some older people who may rely on cars as a form of travel. For some people, walking and cycling is not an option. The Council must ensure older people are not portrayed in a negative light and do not feel excluded as part of this initiative." (May 2009, p.5) These issues should be resolved at site level.
- In addition the EqIA, also pointed out "Some BME groups tend to have larger families. Reducing car based travel use may have a negative impact of those families who, due to safety and cost issues, may find it harder travel by other modes. The Council monitor the impact of these initiatives to ensure larger families are not adversely affected by this initiative." (May 2009 p.6)

Difficulties encountered/assumptions made

- The details of what constitutes the minimum supporting transport i.e. bus networks which will accompany new development is not clear. The principle of building developments in accessible locations is there but the evidence to back up all of areas of growth particularly new housing is not in the supporting text.
- Not clear on whether the PTAL ratings on the inset map 6 represent the latest figures.

Avoidance/Mitigation

- Reference to Crossrail should be emphasised more. Reference that the policy needs to be based on up to date evidence of current PTAL scores. Update map to illustrate the current and predicted PTAL scores over the plan period.
- Commitment to improve transport and access through S106. Include a section on design against crime initiatives around public transport nodes including bus stops, train stations etc. Transport greening initiatives such as greening verges would improve this further. Consider equality groups especially the elderly who are reliant on car use to ensure their accessibility is not further reduced.

Measures taken into account

- The mapping sets out the PTAL scores more clearly. More emphasis is placed on the reliance on the private car. More emphasis has been added to improve general access requirements.

Core Strategy Policy 7: Locating Infrastructure

Summary of effects

- This is a new policy in response to preferred options comments on integrating growth with utilities and essential infrastructure providers.
- Neutral effects on population, crime & safety and employment and skills.
- Potential positive effects if the policy is implemented correctly on transport, poverty & social exclusion, waste, biodiversity, soil, water & noise, air, climate, cultural heritage, equalities, human health, housing, landscape & townscape and the economy.
- Potential negative effects on cultural heritage if not implemented correctly.

Difficulties encountered/assumptions made

- The locations of this infrastructure and impacts at a site level are not known at this stage.

Avoidance/mitigation

- Adverse impacts generated as a result of the installation of new infrastructure to be resolved at a site level. Sustainable measures of design and construction to be applied.

Measures taken into account

- Agreement to consider as part of the Development Management DPD.

1.4 Supporting Neighbourhoods and Communities

Figure 4: Sustainability Appraisal Findings Summary – Supporting Neighbourhoods and Communities

	Population	Biodiversity	Soil, water & noise	Air	Transport	Climate	Cultural Heritage	Equalities	Poverty & Social Exclusion	Human Health	Crime & safety	Housing	Landscape & townscape	Waste	Economy	Employment and Skills
8. Focusing Social Investment	?	?	?	?	?	?	?	+	+	+	+/?	+/?	?	?	+/?	+/?
9. Investing in Education	0	?	?	?	?	?	?	+/?	+/?	+	+/?	+/?	?	?	+/?	+/?
10. Lifelong learning	0	?	?	?	?	?	?	+/?	+/?	+	+/?	+/?	?	?	+/?	+/?
11. Health Investment and Infrastructure	0	-/?	0	-/?	-/?	-/?	-/?	+/?	+/?	+	+/?	-/?	0	0	+/?	+/?
12. Health and Environment	0	+/?	?	?	-/?	?	-/?	+/?	+/?	+	?	-/?	+/?	?	+/?	+/?

Core Strategy Policy 8: Focusing Social Investment

Summary of effects

- This policy expands on Preferred Options Policy 22. The presumption is that this policy should be within areas of growth. However this is not the policy position chosen at the issues and options stage which was that provision should be focused on areas most in need which is not necessarily the same thing.
- Significant positive effects on the SEA/SA topic areas and related SA objectives on equalities and poverty & social exclusion.
- The impact on the topic areas population, crime & safety, housing, economy and employment and skills and related SA objectives is dependent on implementation but if there were to be an impact it would most likely be positive or minor positive impacts.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for population, biodiversity, soil, water & noise, air, transport, climate, cultural heritage, landscape & townscape and waste.
- The current inset map 4 inhibits the clarity of this policy and would reduce performance if included. It identified sport hall priority areas and child play priority areas. These are not the only priorities for social infrastructure and the information does not appear to be accurate. Sport halls are generally outside the areas of growth (excluding Woodberry Down) and estate renewal locations. The map does not demonstrate a consideration for the increase demand that there will be as a result of the growth in the borough. The child play priority areas feature a lot in our existing areas of open space although urban areas are also selected. The definition of this is not clear here. It is appreciated the improvement of the quality of our open spaces is important and this is addressed in the Cleaner, Greener and Safer Chapter. However in regard to the provision of community infrastructure it is important to consider that children can use an existing park as a playground but if there is neither a playground or a park they can access than efforts should be put in place to priorities these areas of need.

Difficulties encountered/assumptions made

- Concerns about the lack of knowledge of the additional infrastructure required to accompany the growth anticipated. There is a vagueness on the delivery mechanisms and on how the broad aspirations may be implemented. It is appreciated that we are operating in absence of a detailed evidence base study. A more in-depth review sifting through the evidence currently held by the relevant departments to identify the picture of community infrastructure need in land use terms would be beneficial.
- Through discussions it has been suggested that the delivery of successful S106 has not been effective with only one health facility ever being created from this resource. The reasons for this should also be uncovered and addressed.
- Concern about the presumption that new infrastructure will be located in the areas of growth.

- The AAPs for the key growth areas are at their advanced stages now for Dalston, Hackney Central and Hackney Wick. The Woodberry Down Outline Application Masterplan. Linkages on the gaps identified in this work and the key priorities of this chapter should be added.

Avoidance/mitigation

- Demonstrate by reference to areas why the focus should just be in areas of growth. The updated SA Scope does not have the evidence for this and is if the view that the focus should be in the most deprived areas. Should change the policy to say “primarily in areas of most need and to support the growth areas”.
- Policy cross referencing in the growth areas where relevant. Cross links with AAPs. Inclusion of S106 and steps to best use this mechanism in the future in implementation plan. Commitment to review problems and issues with the S106 delivery vehicle for community infrastructure in the implementation plan.
- The mechanisms outside planning resulting from national funding should also be clearly laid out and the implications should the CIL regulations should they come into effect. Where possible our policies should be checked to see if they can also be successfully implemented under the new legislation.
- Be more specific about where the areas most in need are. Policy cross referencing in the growth areas where relevant.
- The current map 4 identified sport hall priority areas and child play priority areas. This does not correspond with any policy or indeed is helpful. It is in fact misleading and should be removed.

Measure taken into account

- Insertion of the infrastructure Programme in table 5.3. (This should also be mapped to clarify the spatial picture) The mapping has been revised. Ongoing discussions will occur in relation to improving the S106 SPD.

Core Strategy Policy 9: Investing in Education & 10: Lifelong Learning

Summary of effects

- These policies expand on preferred options policy PPO22.
- These policies will result in a significant positive impact on human health.
- The impact on the topic areas equalities, poverty & social exclusion, crime & safety, housing, economy and employment and skills and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- There will be a neutral or negligible effect on population

- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for biodiversity, soil, water & noise, air, transport, climate and cultural heritage.

Difficulties encountered/assumptions made

- We should determine where possible the areas of deficiency based on the specific needs in Hackney with the objective to at least bring education standards to London wide and national standards.

Avoidance/mitigation

- Illustrate more that facilities will seek to achieve London and national levels and focus specifically on those areas where performance is lowest.
- Cross links with AAPs.
- Inclusion of a reference of the role of S106 policy and other delivery mechanisms.

Measure taken into account

- Reference to funding streams, delivery mechanisms and AAPs were included.

Core Strategy Policy 10: Health Investment and Infrastructure

Summary of effects

- This policy expands on Preferred Options Policy PPO22.
- Option will result in a significant positive impact on human health.
- The impact on the topic areas equalities, poverty & social exclusion, economy and employment and skills and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- There will be a neutral or negligible effect on population, soil, water & noise, landscape & townscape and waste.
- The impact on the topic areas biodiversity, transport, climate and housing and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.

Difficulties encountered/assumptions made

- We should determine where possible the areas of deficiency based on the specific needs in Hackney with the objective to at least bring health standards to London wide and national standards.

Avoidance/mitigation

- Illustrate more that facilities will seek achieve London and national standards and focus specifically on those areas where performance is lowest. Policy cross referencing in the growth areas where relevant.
- Cross links with AAPs. Inclusion of reference to the role S106 policy.

Measure taken into account

- Reference to funding streams, AAPs and the principles of the policies application have been strengthened.

Core Strategy Policy 12: Health and Environment

Summary of effects

- This is a new policy.
- Option will result in a significant positive impact human health.
- The impact on the topic areas biodiversity, equalities, poverty & social exclusion, landscape & townscape, economy and employment and skills and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- There will be a neutral or negligible effect on population.
- The impact on the topic areas transport, cultural heritage and housing and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- Inconclusive evidence in relation to impacts on soil, water & noise, air, crime & safety and waste.

Difficulties encountered/assumptions made

- There is an absence of information in what constitutes accessible for all and meeting the needs of the Hackney residents. The implementation of this policy principle in practical terms may not delivered if further clarity on the standards required to deliver these objectives are not set out.

Avoidance/mitigation

- Clarity on the development standards required in the implementation of this policy. Cross links with AAPs. Inclusion of S106 and steps to best use this mechanism in the future in implementation plan.

Measure taken into account

- Reference to funding streams and AAPs have been added.

1.5 A Dynamic and Creative Economy

Figure 5: Sustainability Appraisal Findings Summary – A Dynamic and Creative Economy

	Population	Biodiversity	Soil, Water & Noise	Air	Transport	Climate	Cultural Heritage	Equalities	Poverty & Social Exclusion	Human Health	Crime & safety	Housing	Landscape & townscape	Waste	Economy	Employment and Skills
13. Town Centres	?	-/?	-	-/?	+	-/?	+	+	+	0	+	+	+	-	+	+
14. Street Markets	?	?	-/?	?	?	?	?	+	+	?	?	?	+	-/?	+	+
15. Night-Time Economy	+	?	-	?	?	?	-/?	+	+	-	-	?	?	-/?	+	+
16. Employment Opportunities	?	-/?	-/?	-/?	?	-/?	-/?	+	+	+/?	+	?	?	-/?	+	+
17. Economic Development	0	-	+	-	+	-	-/?	+	+	+/?	?	?	+	-	+	+
18. Promoting Employment Land	?	-/?	-/?	-/?	?	-/?	-/?	+/?	+/?	-/?	?	-/?	-/?	-/?	+	+

1.6

Core Strategy Policy 13: Town Centres

Summary of effects

- Policy 13 Town Centres replaces and expands on Preferred Policy Option 26 (PPO26). PPO 26 didn't have any adverse impacts on social, environmental and economic objectives. This expanded policy promotes prosperous economy in town centres and local centres.
- The policy option will result in a significant positive impact on air, transport, equalities, poverty & social exclusion crime & safety, housing, landscape & townscape, economy and employment and skills.
- There will be a neutral or negligible effect and human health.
- The impact on the topic areas biodiversity, air and climate and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- Option will result in a significant negative impact soil, water & noise and waste.
- The relationship between the option/policy and the topic area and related SA objectives is unknown/there is not enough information to make an assessment for population.

Difficulties encountered/assumptions made

- Not clear why Stoke Newington and Finsbury Park are not highlighted as principle growth areas along with Hackney Central.
- No clear relationship with the population topic area could be identified.

Avoidance/mitigation

- Revisions should be made to ensure the local people and business will benefit from the planned economic development. The Council should work in partnership with the other organisations for example, education bodies and training voluntary organisations to provide people with additional opportunity to gain relevant skills to meet job requirements. The Supporting Neighbourhoods and Communities Chapter will assist implementation of policies on provision of infrastructures to support local communities.

Measures taken into account

- The Local Strategic Partnership (LSP) have shown commitment to work with planning policy to help to ensure that local people and businesses will benefit from the economic development. Partnership working is anticipated with education bodies and training voluntary organisations to provide people opportunity to gain relevant skills to meet job requirements.
- The evidence demonstrating Hackney Central's potential as a priority over Stoke Newington and Finsbury Park will be more clearly set out.

Core Strategy Policy 14: Street Markets

Summary of effects

- Policy 14 Street Markets replaces and expands on Preferred Policy Option 27 (PPO27).
- The policy option will result in a significant positive impact on equalities, poverty & social exclusion, landscape & townscape, economy and employment and skills.
- Potential negative effects on waste, soil, water & noise depending on how the policy is implemented.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for population, biodiversity, air, transport, climate, human health, crime & safety and housing.

Difficulties encountered/assumptions made

- The management of street markets includes rota's for cleaning and assurances that noise levels are kept to an acceptable level. Presumption these will be maintained.

Avoidance/mitigation

- At a detailed level measures should be put in place to ensure that street markets continue to be adequately managed and maintained.

Measures taken into account

- Measure to be followed through meeting with the LSP.

Core Strategy Policy 15: Night-Time Economy

Summary of effects

- Policy 15 Night-Time Economy replaces Preferred Policy Option 28(PPO28). PPO 28 had positive impacts on social objectives but also had negative impacts on environmental objectives such as noise and pollution on adjoining neighbourhood's.
- Policy option 15 will result in a significant positive impact on the topic areas and related SA/SEA objectives on economy, employment and skills, equalities, poverty & social exclusion and population.
- The impact on the topic area cultural heritage and waste and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative. It is noted community consultation responses outlined the fear of noise and disturbance from the night-time economy. The Equalities Impact Assessment, May 2009 p.8 set out that "In other areas of the country the expansion of the visitor and night-time economy has had a negative impact, in terms of anti-social behaviour and complaints related to noise and rubbish"
- Option will result in a significant negative impact on the topic areas soil, water & noise, human health, crime & safety and related SA/SEA objectives.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for biodiversity, air, climate, transport, housing and landscape & townscape.

Difficulties encountered/assumptions made

- No direct link with biodiversity, transport, housing and landscape & townscape.

Avoidance/mitigation

- The supporting text should emphasise that impacts to local residential areas in particular must be taken into account.

Measures taken into account

- The policy takes this recommendation into account. The supporting text includes an emphasise that impacts to local residential areas

Core Strategy Policy 16: Employment Opportunities

Summary of effects

- Core Strategy Policy 16: Employment Opportunities is new.

- The option will result in a significant positive impact on the topic areas and related SA/SEA objectives on equalities, poverty & social exclusion, crime & safety, economy and employment and skills.
- The impact on the topic area human health and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- The impact on the topic areas biodiversity, soil, water & noise, air, climate, waste and cultural heritage and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative.
- No clear relationship with topic areas population, housing, landscape & townscape and transport.

Difficulties encountered/assumptions made

- The employment policy presumes that the level of appropriate commercial and industrial development is clear however this can vary significantly at a site level. This variation may generate different impacts on the ground.

Avoidance/mitigation

- Implementation of sustainable design of any commercial and industrial development to ensure no adverse impact on environment.
- Where sites are in flood risk zones 2 or 3, a detailed sequential test is required.
- Ensure the local people and business will benefit from any economic growth.
- The Council should work in partnership with the other organisations for example, education and training bodies and related voluntary organisations to provide people with more opportunities to gain relevant skills to meet job requirements.

Measures taken into account

- See the assessment of policy 31 Flood Risk Policy 31 for more detail on measures adopted to tackle flooding.
- Links have been forged with education and training initiatives to support the policy however these need to be delivered through working with the LSP over the lifetime of the plan.

Core Strategy Policy 17: Economic Development

Summary of effects

- This policy is new.
- Policy Option 17 will result in a significant positive impact on the topic areas soil, water & noise, transport, equalities, poverty & social exclusion, landscape & townscape employment and skills and the economy.
- The impact on the topic area human health and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- There will be a neutral or negligible effect on the population.
- The impact on the topic area cultural heritage and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- Option will result in a significant negative impact on biodiversity, air, climate and waste.
- No clear relationship with topic areas and related SA/SEA objectives crime & safety and housing.

Difficulties encountered/assumptions made

- Conflict between the London Plans position on Strategic Industrial Locations and the Olympic Delivery Authorities (ODA) position on mixed use and housing lead growth in the Hackney Wick Area.

Avoidance/mitigation

- Discussions and negotiations with the GLA and the ODA.
- Implementation of sustainable design a detailed sequential test needs to be undertaken to mitigate the adverse impact of flood risks.

Measures taken into account

- See Flood Risk Policy 31 assessment.

- Ongoing negotiations with GLA and ODA.
- Environment standards to be taken forward through a Development Management SPD.
- Links have been forged in the policy to education and training and focus has been given to those appropriate locations deemed in the London plan through LSP.

Core Strategy Policy 18: Promoting Employment Land

Summary of effects

- This is a new policy.
- Option will result in a significant positive impact on the topic areas economy and employment and skills.
- The impact on the topic areas equalities and poverty & social exclusion and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- The impact on the topic areas biodiversity, social, water & noise, air, climate, cultural heritage, human health, housing, landscape & townscape and waste and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for population, transport and crime & safety.

Difficulties encountered/assumptions made

- As also mentioned above in the assessment of policy 17 there is a conflict between the London Plans position on Strategic Industrial Locations and the Olympic Delivery Authorities (ODA) position on mixed use and housing lead growth in the Hackney Wick Area.

Avoidance/mitigation

- Discussions and negotiations with the GLA and the ODA.
- Implementation of sustainable design of any commercial and industrial development to ensure no adverse impact on environment.
- Where development sites are located in flood risk zones, a sequential test will be required. Measures taken into account
- Environment standards to be taken forward through a Development Management SPD.

1.7 Providing Better Homes

Figure 6: Sustainability Appraisal Findings Summary – Providing Better Homes

	Population	Biodiversity	Soil, Water & Noise	Air	Transport	Climate	Cultural Heritage	Equalities	Poverty & social exclusion	Human Health	Crime & safety	Housing	Landscape & townscape	Waste	Economy	Employment and Skills
19. Housing Growth	?	-	-	-	-/?	-	?	+	?	?	?	+	+	-	+	+
20. Affordable Housing	+	-	-	-	+	-	?	+	+	+	?	+	-	-	+	?
21. Supporting Housing Requirements	+	0	-/?	-/?	0	-/?	-/?	+	+	+	?	+	?	?	?	?
22. Housing Density	+	-	-	-	+	-	-/?	+/?	+/?	+	+	+	+/?	-	+	?
23. Provision for Gypsy and Travellers	+	0	0	0	0	0	?	+	+	0	0	+	-/?	+	?	?

Core Strategy Policy 19: Housing Growth

Summary of effects

- Policy 19: Housing Growth replaces and expands on the Preferred Policy Option 17 and 19 (PPO17 and PPO19). PPO17 and PPO19 didn't have adverse negative impacts on social, economic and environmental objectives.
- Option will result in a significant positive impact on equalities, housing, economy and employment and skills.
- Option will result in a significant negative impact on biodiversity, soil, water & noise, air, climate and waste.
- Potential negative effects on transport if new facilities are not provided to support the additional needs generated.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for population, cultural heritage, poverty & social exclusion, human health and crime & safety.

Difficulties Encountered/ assumptions made

- The main housing growth options are London Plan lead, however the evidence base at the regional level is thin in parts.
- Population predictions and policies for housing and densities in line with national and regional guidance is going to increase pressures on Hackney's social, economic and transport infrastructure and potentially could lead to increases in poverty, deprivation, poor health, waste generation and worklessness. This policy needs to be applied in conjunction with Strategic Policy in the Delivery Sustainable Growth and Climate and Environmental Sustainability Chapters and also be in line with the North London Joint Waste Plan.

Avoidance/ Mitigation

- More emphasis on greening initiatives such as green walls, green walls, bat boxes and bird boxes to mitigate against environmental effect.
- Work with infrastructure providers to ensure water supply and energy provision is planned ahead and that sustainable models are allied.
- Lobby the GLA to provide more detailed SA evidence behind all of their growth options and policies.

Measures taken into account

- An Affordable Housing DPD will be produced.
- More housing evidence based studies are underway.

Core Strategy Policy 20: Affordable Housing

Summary of effects

- Policy 20: Affordable Housing replaces and expands on the Preferred Policy Option 18 (PPO18).
- Option will result in a significant positive impact on population, transport, equalities, poverty & social exclusion, human health, housing, economy and employment and skills.
- Option will result in a significant negative impact on biodiversity, soil, water & noise, air, climate, landscape & townscape and waste.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for cultural heritage, crime & safety and employment and skills.

Difficulties Encountered/ assumptions made

- No clear relationship between the option/policy and the topic area and related SA objective for cultural heritage, crime & safety and employment and skills.
- The assumption is that the policy will be delivered. However it is known that there will be difficulties in delivering this policy given the competing demands for sustainability standards and family accommodation Failure to provide adequate affordable housing could generate poverty, deprivation, poor health, waste generation and worklessness. Possible significant environmental effects resulting from the significant increases in housing predicted. Possible economic effects resulting from the increased demands on employment to support new communities in Hackney.

Avoidance/mitigation

- The supporting text should include a section on viability, and consider the challenges in the delivery of 50% affordable housing on sites. Meeting and discussion to work out compromises on competing demands i.e. an area priority study.

Measures taken into account

- Measures have been taken to ensure affordable housing can be more easily delivered against viability challenges. An Affordable Housing SPD is going to be carried to further support the delivery of this policy.

Core Strategy Policy 21: Supporting Housing Requirements

Summary of effects

- Policy 21: Supported Housing Requirements replaces and expands on the Preferred Policy Option 21 (PPO21).
- The policy option will result in a significant positive impact on population, equalities, poverty & social exclusion, human health and housing.
- There will be a neutral or negligible effect on biodiversity and transport.
- The impact on the topic area soil, water & noise, air, climate and cultural heritage and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for crime & safety, landscape & townscape, waste, economy and employment and skills.

Difficulties Encountered/ assumptions made

- It was not considered possible to make a clear connection between this policy and the crime & safety, landscape & townscape, waste, economy and employment and skills topic areas.

Avoidance/Mitigation

- Meetings, negotiations and discussion necessary on marrying these requirements with the additional affordable housing, design and sustainability standards to allow for successful delivery on the ground.
- An Affordable Housing SDP is required.

Measure taken into account

- An affordable housing SPD is planned in the near future.

Core Strategy Policy 22: Housing Density

Summary

- Policy 22: Housing Density is a new addition since the Preferred Options stage.
- This policy option will result in a significant positive impact on population, transport, human health, crime & safety, housing and the economy.
- The impact on the topic areas equalities, poverty & social exclusion and landscape & townscape and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive.
- The impact on the topic area climate and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- Option will result in a significant negative impact on biodiversity, soil, water & noise, air, climate and waste.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for employment and skills.

Difficulties Encountered/ assumptions made

- It is important this is implemented alongside the Supporting Neighbourhoods and Communities Chapter to ensure social infrastructure provision.

Avoidance/mitigation

- The EqlA, June 2009 set out that “As part of the consultation process, some groups, particularly those with larger families, have express concerns related to the proposed restriction of extensions to dwellings. Such extensions may help ease overcrowding and improve living conditions, particularly for larger families; however the aim of the restriction is to protect the architectural and visual integrity of the Borough.”. It is important this is considered for Development Management policy development.
- Greening initiatives to support urban biodiversity and reduce environmental impacts are recommended. Efforts to secure further infrastructure improvements.

Measures taken into account

- Measures have been taken to ensure that social infrastructure is included in the development of new schemes especially where densities are higher which will lead to increasing demands.
- Greening initiatives to support urban biodiversity and reduce environmental impacts taken forward in the energy efficiency policies 29 and 30.

- Efforts to promote further infrastructure improvement taken forward in the Transport Policies 6 & 33 and Locating Infrastructure Policy 7.

Core Strategy Policy 23: Provisions for Gypsy and Travellers

Summary of effects

- Policy 23: Provision for Gypsies and Travellers replaces and expands on the Preferred Policy Option 21 (PPO21). PPO21 didn't have adverse negative impacts on social, economic and environmental objectives.
- Significant positive effects are anticipated on topic areas and related SA/SEA objectives for population, equalities, poverty & social exclusion, housing, and waste.
- There will be a neutral or negligible effect on biodiversity, soil, water & noise, air, transport, crime & safety, human health, and climate.
- The impact on the topic area landscape & townscape and related SA objective is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for cultural heritage, economy and employment and skills.

Difficulties Encountered/ assumptions made

- No additional sites have been allocated for the Gypsy and Traveller and Travelling Showpeople community. Evidence show there is a need for at least one new site in the borough.

Avoidance/Mitigation

- The Gypsy and Traveller and Travelling Showpeople community have compared against national standards one of the lowest recorded living standards than any other ethnic minority group in the country. Ensure that appropriate, high quality site or sites are provided in the borough and measure should be put in place to improve the existing new site in the borough that has been moved from the Hackney Wick Area.

Measures taken into account

- Demonstrate measures have been taken to commence work on the allocation of Gypsy and Traveller as part of the site allocation DPD.

1.8 A Safer, Cleaner and Greener Place

Figure 7: Sustainability Appraisal Findings Summary – A Safer, Cleaner and Greener Place

	Population	Biodiversity	Soil, Water & Noise	Air	Transport	Climate	Cultural Heritage	Equalities	Poverty & social exclusion	Human Health	Crime & safety	Housing	Landscape & townscape	Waste	Economy	Employment and Skills
24. Design	0	+	+/?	+	+/?	+	-/?	+/?	+/?	0	+/?	+/?	+/?	+/?	+/?	+/?
25. Historic Environment	0	-/?	-/?	-/?	0	-/?	+	0	+/?	0	+/?	+	+	0	+/?	+/?
26. Open Space Network	0	+/?	+/?	+/?	0	+/?	+/?	+/?	+	+	0	+/?	+/?	0	+/?	0
27. Biodiversity	0	+/?	+/?	+	0	+	0	+/?	+/?	+/?	0	+/?	+	0	+/?	0
28. Water and Waterways	0	-/?	-/?	?	0	-/?	?	+/?	+/?	+/?	0	+/?	?	?	+/?	+/?

Core Strategy Policy 24: Design

Summary of effects

- The policies performance improves on the Preferred Options 13, 28 and 32 it replaces.
- Significant positive effects are anticipated for biodiversity, air & climate.
- The impact on the topic areas soil, water & noise, transport, equalities, poverty & social exclusion, human health, crime & safety, housing, landscape & townscape, waste economy and employment and skills and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- Potential negative impacts on cultural heritage objectives depending on how the policy is implemented.
- There will be a neutral or negligible effect on population and human health.

Difficulties encountered / assessment made

- The performance of this policy relies on an alignment with Local Development Framework. No current reference to the Sustainable Standards for the Built Environmental SPD mentioned in the supporting text which is currently in the Local Development Scheme.
- This should be addressed in the implementation chapter

Avoidance/mitigation

- Consult with the Environmental Consultation Bodies (ECBs).
- Alignment with the LDF especially the Local Development Scheme to ensure the policy is implemented correctly.

Measures taken into account

- Consultation with the ECBs informally was undertaken.
- Revisions to the policy section 8.14 links the policy to the Development Management DPD, the AAP's, design codes and emerging SPDs.

Core Strategy Policy 25: Historic Environment

Summary of effects

- This policy improves on the performance of the Preferred Options Policy PPO14 which it replaces.
- Significant positive effects on cultural heritage.
- The impact on the topic areas poverty & social exclusion, crime & safety, economy and employment and skills and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- There will be a neutral or negligible effect on population, transport, equalities, human health, and waste.
- The impact on the topic areas biodiversity, soil, water & noise, air and climate and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.

Difficulties encountered/assumptions made

- It is difficult to quantify what is meant by the term 'enhance the special character of the conservation area'. This is a subjective judgement made by the Development Control officer that may or may not be effective.
- This policy can only be effectively implemented if the Local Development Framework is aligned. It is appropriate for these principles to be applied in a Development Management SPD.
- The mapping is unclear. The conservation areas and areas of archaeological priority are on different maps. The existing nationally and locally listed buildings do not appear.
- This policy acts to support and protect the distinct character of Hackney and the historic environment against the increasing development pressures anticipated as a result of the population increases forecasted.
- Potential effects on zones of archaeological remains where proposed estate renewal areas overlap. An explanation of this is required in the supporting text. Historic squares are offered protection under legislation but not mentioned in the policy. This may inhibit their protection.

Avoidance/Mitigation

- Consult English Heritage informally on the policy.

- Clarity on the position of estate renewal projects which overlap with archaeological priority areas i.e. “estate renewal projects coming forward will developed in consultation and engagement with English Heritage and be subjected to all the prescribed procedures to ensure they do not have adverse effects on any areas of archaeological priority in the borough”.
- Historic squares are referred to as in the appendix and the supporting text. Possible inclusion to them in the policy just to clarify potential adverse effects on the archaeological remains as a few of the estate renewal project appear to overlap with these zones.
- Areas of archaeological priority to be moved from map 7 to map 2 and to include protected squares.

Measures taken into account

- The mapping has been clarified to include archaeological priority zones and conservation areas.
- English Heritage were informally consulted on and made no objections to the policy.

Core Strategy Policy 26: Open Space Network

Summary of effects

- This policy replaces Preferred Options Policy PPO33. It changes the position of a 'no net loss' of open space. It sets out to protect quality open spaces and to allow development on unused, unprotected public open space that does not have any amenity value.
- Option will result in a significant positive impact on poverty & social exclusion and human health.
- The impact on the topic areas biodiversity, water & noise, air, climate, cultural heritage, equalities, housing, landscape & townscape and economy and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- The Habitats Regulations Assessment set out that due to the 10,850 homes planned to be delivered in Hackney in combination with the 22,700 houses to be delivered within those other districts/boroughs that surround the SAC during the plan period, and an 'incombination' adverse effect upon the SAC could result in the absence of mitigation. It states these are mitigated through the Core Strategies Open Spaces Policy Page 32 of the HRA outlined that “It was stated that the provision of such a network in close proximity to people’s homes should reduce the number of people feeling the need to travel to Epping Forest for recreational purposes. The policy on the Open Space Network addresses this point by stating ‘All open and green spaces should be well-managed and enhanced to improve quality, capacity and public accessibility, to support a diverse and multi-functional network of open spaces. Where appropriate, new open spaces will be created which are publicly accessible and linked to other open spaces to enhance the borough's green infrastructure’. In addition, the Council has confirmed that they will liaise with the Epping Forest Conservators and other stakeholders to assist in the long-term delivery of the Management Plan for Epping Forest SAC with regard to any changes to the management of the site that are necessary as a result of increased visitor numbers that would be associated in part with the increased population in the northeast.
- There will be a neutral or negligible effect on population, transport, crime & safety, waste and employment and skills.

Difficulties/assumptions made

- The current open space deficiency figures do not reflect the increases in densities and predicted population increases. Although existing spaces may not been used to the best advantage once developed they are lost. There should be an onus on the developer to demonstrate that where a loss ins incurred the replacement open space is located in areas of predicted need.
- Lack of clarity about whether it is green chains or green corridors that are being protected and where these actually are on the map. Update map to highlight where green chains are, and include reference of green corridors which are outlined on inset map 7. To support delivery more clear mapping of 'new opens spaces' especially in Dalston which has high levels of open space deficiency such as the.

Avoidance/ mitigation

- Consult with Natural England on the principle of the removal of the 'no net loss' in the policy. Ensure the replacement open space is provided in areas most in need.
- Update the map to highlight where green chains are, and include reference of green corridors which are outlined on inset map 7. To support delivery more clear mapping of 'new opens spaces' especially in Dalston which has high levels of deficiency such as the Curve and Gillett Square.

Measures taken into account

- Supporting text to note that new replacement open space should be of high quality and located in areas most in need.
- Update map to highlight where green chains are, and include reference of green corridors which are outlined on inset map 7.
- To support delivery more clear mapping of 'new opens spaces' especially in Dalston which has high levels of deficiency such as the Curve and Gillett Square.
- Natural England through additional consultation notes their support for the position on the removal of the 'no net loss' of open space.

Core Strategy Policy 27: Biodiversity

Summary of effects

- This policy expands on Preferred Policy Options (PPO) 33. It improves performance as it places more focus on Biodiversity.
- The option will result in a significant positive impact on climate and landscape & townscape.
- The impact on the topic areas biodiversity, soil, water & noise, equalities, poverty & social exclusion, human health, housing and economy and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts. It was

considered significant positive impacts could be achieved if the policy gave a stronger position on requiring biodiversity to be considered in new developments. A clearer position on the international, national, regional and local hierarchy of the protection of sites and species and reference to those located in Hackney to provide a clearer steer on how biodiversity needs to be protected and promoted would also improve performance. It is also considered that there are lost opportunities in promoting green and brown roofs, green walls and so on.

- There will be a neutral or negligible effect on population, transport, cultural heritage, crime & safety, waste and employment and skills.

Difficulties encountered/assumptions made

- These principles are not currently reflected in the Draft Areas Action Plans. The implementation chapter should identify that these will be followed through in the specific treatment of Biodiversity relevant to each of the growth areas.
- The presumption is the policy will seek to implement the Local Biodiversity Action Plan but the timescale of this documents preparation is not yet set out. No identified local priority habitats and species at present. Should we draw more attention to the national and regional ones?
- Inset map 7: There is no distinction between these policies at a national, regional a local level. Presumption this will be resolved at a site level.
- What is an appropriate development in a site of Importance for Nature Conservation. Is the presumption not to protect these from development?

Avoidance/mitigation

- The policy should highlight greening developments initiatives such as green roofs, green walls, SUDS etc.
- There are potentially nationally rare species in the borough including Black Poplar and Bats. There is no definition of 'inappropriate development or cross reference to PPS 9 of what this may be. The presumption is from national and regional guidance that habitats and species of national and regional importance will be protected. This is not clear. There is no mention of habitats in this policy which as above may inhibit their protection. The policy should be revised to consider the above.
- The distinction between regional and local value of biodiversity in relation to the SINCs is also not clear. This gives the impression they are allocated the same protection weight in policy terms however this is not the case under PPS 9. This should be clarified.

Measures taken into account

- The policy has been revised in parts to further clarify and protect Biodiversity however there is scope for further clarity.

Core Strategy policy 28: Water and Waterways

Summary

- This policy replaces and expands on Preferred Policy Option (PPO) 33. The Preferred Options SA preferred options policy did not identify adverse impacts.
- There are still potential impacts on biodiversity, climate (especially in regards to flooding related SA objectives) and soil, water & noise if this policy is not sensitively implemented as any development along the waterways may incur impacts.
- The impact on the topic areas equalities, poverty & social exclusion, human health, economy, employment and skills and housing and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- There will be a neutral or negligible effect on population, transport, crime & safety.
- The relationship between the option/policy and the topic area and related SA objective is unknown/there is not enough information to make an assessment for air, cultural heritage, landscape & townscape, and waste.

Difficulties encountered/assumptions made

- The policy presumes that appropriate development is clear however this would vary significantly depending on the location of the location as there are an abundance of waterfronts in the borough with different assets. Some areas may of high biodiversity value, some waterfront locations may be of predominately industrial. Some areas may be in areas of high risk of flooding etc.

Avoidance/mitigation

- Removal the designation for 'waterfront developments' entirely from map 7 or at a minimum in all inappropriate locations.
- Specify the type of waterfront development will be considered on a case by case basis in context of the area or highlight particular locations for the type of waterfront development that would be most appropriate.

Measures taken into account

- The designation on the map has been clarified as a 'Waterfront Consultation Area'. The protection clauses in the policy cover the different types of development that would be appropriate along the waterfronts both through consultation with the Environment Agency.

1.9 Climate Change and Environmental Sustainability

Figure 8: Sustainability Appraisal Findings Summary – Climate Change and Environmental Sustainability

	Population	Biodiversity	Soil, Water** & Noise	Air	Transport	Climate	Cultural Heritage	Equalities	Poverty & social exclusion	Human Health	Crime & safety	Housing	Landscape & townscape	Waste	Economy	Employment and Skills
29. Resource Efficiency and Reducing Carbon Dioxide	?	+	-/?	-/?	0	+	-/?	0	+/?	+/?	0	+/?	-/?	0	+	0
30. Low Carbon Energy, Renewable Energy	?	+	-/?	-/?	0	+	-/?	0	+/?	+/?	0	+/?	-/?	0	+	0
31. Flood Risk	-/?	+/?	+/?	+/?	0	+	-/?	-	-	-	-/?	-	0	+/?	0	0
32. Waste	-/?	+/?	-/?	0	0	0	-/?	+/?	+/?	+/?	0	+/?	-/?	+	+/?	+/?
33. Promoting Sustainable Transport	0	-/?	0	+/?	+	+/?	-/?	+/?	+/?	+/?	0	+/?	-/?	-/?	+/?	+/?

Core Strategy Policy 29: Resource Efficiency & 30: Renewable and Low Carbon Energy Development & Energy Efficiency

Summary of effects

- Renewable and Low Carbon Energy Development replaces elements of the Preferred Options Policy (PPO) 15 and Energy Efficiency replaces Preferred Options Policies 34, 15 and 20.
- The policy option will result in a significant positive impact on biodiversity, climate, and economy. Reductions in CO2 and other pollution will reduce likely impacts of growth on Biodiversity. The Habitats Regulations Assessment, May 2009 sets out that there is some uncertainty over future security of supply of water in London as a whole. It notes that it is clearly incumbent upon local authorities to assist in reducing the demand for water within their boroughs. The best way for Hackney Council to achieve this is to set minimum standards that developers must achieve in order to maximise sustainable water use. Policy 30 (Resource Efficiency) achieves this and states that residential developments will need to achieve '*...minimum ratings of Level 3 from 2010, Level 4 from 2013 and Level 6 from 2016*'. As a result it sets out that on page 30 that "It is therefore possible to conclude that the development is to be delivered under the Core Strategy would be unlikely to lead to adverse effects upon the Lee Valley "SPA as a result of any contribution to unsustainable levels of abstraction.
- The impact on the topic areas poverty & social exclusion, human health and housing and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive.
- There will be a neutral or negligible effect on population, transport, equalities, waste and employment and skills.
- The impact on the topic areas air, soil, water & noise, cultural heritage and landscape & townscape and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative. Potential effects of retrofitting in conservation areas and conflicts here with listed buildings.

Difficulties encountered/assumptions made

- The main challenges in this section are the constraints to implementing renewable and low carbon technology. Are there a certain amount of houses in the development or redevelopment that would trigger this? Does it apply to estate renewal or just developments?
- This policy expands and strengthens the elements to support reducing carbon dioxide. If this policy is not implemented there is a high risk of the growth anticipated generating pollution far beyond recommended levels - most of Hackney is currently in an air quality management area. It is though

environmental improvements will play a large role in making Hackney a better place to live and work however issues around the viability of schemes given pressures for 50% affordable housing need to be considered.

Avoidance/mitigation

- Consult the Environmental Consultation Bodies (ECBs).
- Include text on the importance of sensitivity to design in conservation areas.
- Ensure through partnership working with the LSP and other key partners this is applied to the major estate renewal projects and all council led schemes.

Measures taken into account

- Further consultation with the ECBs on this who have noted they are content.
- Reference to CHP in the other main growth areas but not specifically to the estate renewal projects.
- Minor editing change and changes to policy titles.

Core Strategy Policy 32: Flooding

Summary

- This policy updates PPO 14 Climate Change and Flood Prone Land.
- The impact on the topic areas biodiversity, soil, water &, air, climate, and waste and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts.
- It is noted this policy does reduce the risks of flooding however despite a positive policy adverse effects in this area cannot be ruled out at this stage. Significant negative effects were predicted for the topic areas and related SA/SEA objectives poverty & social exclusion, equalities, human health, housing and crime & safety. It is noted however a SFRA Level 2, Surface Water Management Plan and mitigation options analysis are going to be undertaken prior to the examination of the Core Strategy. These will provide the necessary evidence to reduce the risks of any adverse impacts occurring.
- There will be a neutral or negligible effect on the economy, employment & skills, transport, and landscape & townscape.
- The impact on the topic areas population and cultural heritage and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative.

Difficulties encountered/assumptions made

- The SFRA has not yet been completed. The policy position in Hackney Wick has not yet been resolved.

Likely significant effects

- Potential significant adverse effects against poverty and social, health, equalities, crime & safety and housing SA objectives. If inappropriate development particularly housing is located in Flood Risk Zone 3 despite the findings of the sequential test. In addition one also needs to ensure appropriate measures are in place to ensure that existing housing in flood risk zones have appropriate emergency planning measures.
- Neutral effects against the biodiversity topic are and related SA/SEA objectives. Strengthening of the requirements for SUDS and green/brown roofs and the use of permeable surfacing would further support flooding and biodiversity.

Avoidance/Mitigation

- Carry out a Strategic Flood Risk Assessment Level 2 and Sequential Test. Consult with the Environment Agency on this policy and the implications for Hackney Wick.
- Include a position on Pluvial flooding in Hackney requiring major applications to be consulted upon by the Emergency Planning Team.

Measures taken into account

- The SFRA Sequential Test has been carried out to support the plan. Extensive consultation with the Environment Agency who have noted their support for this policy and the position in Hackney Wick in a formal letter.
- Internal discussion and negotiation have taken place with the Emergency Planning Team and this will feature in Development Management Policies.

Core Strategy Policy 32: Waste

Summary of effects

- This policy replaces Preferred Option PPO35. The Preferred Options SA noted that we will need to consider the findings in the NLWP SA and these updates are ongoing. The preferred options SA refers to new major waste transfer facilities in the borough. This is no longer the case. Hackney has two existing sites which have been outlined for safeguarding in the Preferred Options version of the draft NLWP DPD, July 2009. This is still subject to group Council ratification.
- The option is likely to have a significant positive effect on the waste topic area and associated objectives.

- The impact on the topic areas biodiversity, human health, equalities, poverty & social exclusion, employment and skills, economy and housing and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts. Better management of waste may reduce the adverse impacts from poor waste management and associated pollution. Poorly managed waste from industrial uses along rivers and canals can reduce water quality. The main cause of pollution reported by the EA is unauthorised activity including flytipping and unauthorised discharge.
- There will be a neutral or negligible effect on crime & safety, air, climate and transport.
- The impact on the topic areas soil, water & noise, population, cultural heritage landscape & townscape and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts.

Difficulties encountered/assumptions made

- The North London Waste Authority and the North London Borough Consortium are two separate groups. Aspects of the NLWP are still under debate and the preferred options document has not yet gone out to consultation. There were conflicts between this and the Waste Procurement Strategy that proposed alternative sites for the management of waste. Resolutions have been made in the latest draft of the NLWP, July 2009. However there are still subject to joint Council ratification.

Avoidance/Mitigation

- Council should take proactive steps to ensure that the safeguarded sites in Hackney are enshrined in the appropriate emerging DPDs. Further alignment with the NLWP would improve performance.
- Reference needed to reducing waste and increasing recycling in the borough and supporting the NLWA Waste and Recycling Strategy.

Measures taken into account

- Reference to the NWLA Recycling Strategy has been made.
- Reference for sensitive development of waste sites to be included in development management policies.
- Hackney's strategy to take these sites forward in the relevant DPDs is in the process of agreement with members as are discussions on the latest draft NLWP DPD.

Core Strategy Policy 33: Promoting Sustainable Transport

Summary of effects

- The preferred options sustainable transport chapter has been removed. This policy replaces the three PPOs 29, 30 and 31. Potential adverse impacts on reducing the prominence of sustainable transport in the plan as supporting transport infrastructure is an essential part of delivering growth.
- Option will result in a significant positive impact transport,
- The impact on the topic areas air, climate, poverty & social exclusion, human health, housing, landscape & townscape, economy, employment & skills, poverty & social exclusion and equalities and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts. Generally supporting transport will increase options for the public however there is no commitment to improve transport in areas where accessibility is very poor in the borough. This would increase peoples living and working opportunities. The Habitats Regulations Assessment set out that there may be in combination effects of air pollutants generate by increases to the use of the private car.. It notes that the A503 (Forest Road) passes through the SPA, separating the two components of Walthamstow Reservoirs SSSI and can expect to receive higher volumes of traffic as a result of 10,850 new homes within Hackney. It notes that increasing nitrogen deposition due to increased road traffic associated can be expected to contribute to deteriorating air quality in a European site that is already exceeding the predicted damage thresholds. However, it sets out in page 28 that Policy 33 (Promoting Sustainable Transport) seeks to minimise the contribution of new development to deteriorating air quality as much as possible mitigating this potential effect.
- There will be a neutral or negligible effect on crime & safety, population and soil, water & noise.
- The impact on the topic areas biodiversity, landscape & townscape and cultural heritage, and waste and related SA objectives is dependent on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts. The Equalities Impacts Assessment, (EqIA) May 2009, p.5 set out “Reducing car based travel and on site parking whilst promoting walking and cycling could have a negative impact on some older people who may rely on cars as a form of travel. For some people, walking and cycling is not an option. The Council must ensure older people are not portrayed in a negative light and do not feel excluded as part of this initiative.”
- In addition the EqIA, (May 2009 p.6) also pointed out “Some BME groups tend to have larger families. Reducing car based travel use may have a negative impact of those families who, due to safety and cost issues, may find it harder travel by other modes. The Council monitor the impact of these initiatives to ensure larger families are not adversely affected by this initiative.”

Difficulties encountered/assumptions made

- The details of what is the minimum supporting transport i.e. bus networks which will accompany new development is not here. The principle of building developments in accessible locations is there but the evidence to back up all of areas of growth particularly new housing is not in the supporting text.
- Not clear on whether the PTAL ratings on the inset map 6 represent the latest figures.

Avoidance/Mitigation

- Reinststate the chapter on transport.
- Insert a reference to Crossrail. Reference that the policy needs to be based on up to date evidence of current PTAL scores.
- Update map to illustrate the current and predicted PTAL scores over the plan period.
- Commitment to improving accessibility for all through S106 and other appropriate mechanisms.
- Include a section on design against crime initiatives around public transport nodes i.e. bus stops, train stations etc. Transport greening initiatives such as greening railway verges.
- Consider equality groups especially the elderly who are reliant on car use to ensure their accessibility is not further reduced.

Measures taken into account

- Additional transport policies added to the Delivering Sustainable Growth Chapter. PTAL map revised and made clearer. New infrastructure mapped more clearly.