

London Borough of Hackney

**Sustainability Appraisal Report
Local Development Framework
Core Strategy Proposed Submission
Document**

June 2009

The London Borough of Hackney Sustainability Appraisal Report of Hackney's Core Strategy Proposed Submission Document

This Sustainability Appraisal seeks to identify the economic, social and environmental impacts of the Core Strategy Proposed Submission Document and suggests ways to avoid or minimise negative impacts and maximise positive ones. It has been prepared in accordance with the European Directive EC/2001/42 (The SEA Directive). Community engagement is an important part of the Sustainability Appraisal and we welcome your views.

How to comment on this report

This report has been published alongside the Core Strategy Proposed Submission Document (The Core Strategy) for a period of six weeks **from 9am on 29th June 2009 to 5pm on 7th August 2009** for representations to be made under the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, Regulation 27. Please send your representations on this report in a reply-paid envelope to:

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1 Introduction

1.1 Overview

- 1.1.1 This Sustainability Appraisal Report seeks to identify the economic, social and environmental impacts of the Core Strategy and suggests ways to avoid or minimise negative impacts and maximise positive ones.
- 1.1.2 This Sustainability Appraisal Report was carried out by Hackney's Sustainability Appraisal Officer throughout the Core Strategy preparation process. The Sustainability Appraisal Officer worked alongside the Planning Policy Team from initial development of the issues and options through to the proposed submission stage. To ensure objectivity was maintained, the Sustainability Appraisal Officer was not allocated the responsibility of writing planning policies but to assess them in sustainability terms and make recommendations as part of their creation to improve their effectiveness, to avoid adverse impacts and to improve positive performance.
- 1.1.3 Two SA Reports have already been published on the earlier iterations of the Core Strategy at the issues and options and preferred options stages of the process. These are available on the London Borough of Hackney's website. Section 1.4 discusses these reports in more detail.
- 1.1.4 This report sets out the findings of the Sustainability Appraisal of the '**Core Strategy Proposed Submission Document**'.

1.2 The purpose of the Sustainability Appraisal

- 1.2.1 Strategic Environmental Assessments are required by the European Directive EC/2001/42 (SEA Directive). This involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme).
- 1.2.2 The Directive entered into force in the UK on the 21 July 2004 and applies to a range of English plans and programmes, including Local Development Frameworks (LDFs).
- 1.2.3 The Government's approach is to incorporate the requirements of the SEA Directive into a wider process which considers the economic and social in addition to environmental effects of development proposals. Under the Planning and Compulsory Purchase Act (2004), enacted through the Town and Country Planning (Local Development) (England) Regulations, (2008) Local Authorities must undertake Sustainability Appraisal (SA) incorporating the requirements of the SEA Directive on DPDs, and where appropriate SPDs.
- 1.2.4 In November 2005, the Government published guidance on undertaking SA of LDFs which incorporates the requirements of the SEA Directive ('the guidance').
- 1.2.5 The guidance advocates a five-stage approach to undertaking SA (see table 1).

Table 1: The five stage approach to Sustainability Appraisal

<p>Stage A</p> <p>Assemble the evidence base to inform the appraisal</p> <p>Establish a framework for undertaking the appraisal (in the form of sustainability objectives)</p>	<p>Scoping Report</p>
<p>Stage B</p> <p>Appraisal the plan objectives, options and preferred options/ policies against the framework taking into account the evidence base.</p> <p>Propose mitigation measures for alleviating the plan's adverse effects as well as indicators for monitoring the plan's sustainability</p>	
<p>Stage C</p> <p>Prepare a Sustainability Appraisal Report documenting the appraisal process and findings.</p>	<p>Sustainability Appraisal Report</p>
<p>Stage D</p> <p>Consult stakeholders on the plan and SA</p>	
<p>Stage E</p> <p>Monitor the implementation of the plan including its sustainability effects).</p>	<p>Local Development Framework Annual Monitoring Report (AMR)</p>

1.3 The Structure of this report

1.3.1 The SA stages A – E are described above. This report fulfils the requirements of stage C. It also documents stage B and summarises stage C of the process. Stage B of the SA process involves the main body of the appraisal work and consists of five key tasks:

- **B1** – Testing the DPD objectives against the SA Framework;
- **B2** – Developing and refining options;
- **B3** – Predicting and assessing effects;
- **B4** – Identifying mitigation measures; and
- **B5** – Developing monitoring proposals.

Stage B has been an iterative process. Options were first developed and considered through community and stakeholder engagement, including a programme of workshops. From these, four main growth areas emerged. Hackney's town centres of Dalston and Hackney Central; improved railway corridors - the East London Line from Shoreditch High Street to Dalston and the North London Line from Hackney Wick to Dalston; the City Fringe connecting Shoreditch to London's Central Activities Zone; with the final being areas where new communities can emerge - the most significant locations being Woodberry Down and Hackney Wick, connecting to the Olympic Legacy.

The London Borough of Hackney Issues and Options Consultation Report, (April 2006) and The London Borough of Hackney Preferred Options Consultation Report (June 2009) both outline how the public were consulted as part of the development of the Core Strategy from the issues and options to the submission stage and how their views were taken into account. These documents are available on the Hackney website and are discussed in more detail in section 1.4 of this report.

1.3.2 This Sustainability Appraisal Report is divided into five main parts.

- **Section 2** - An overview of the Sustainability Appraisal Stage A
- **Section 3** - Hackney's Proposed Submission Core Strategy
- **Section 4** - The Appraisal Methodology
- **Section 5** - The Appraisal Findings
- **Section 6** - Mitigation, Monitoring and Conclusions

1.4 An overview of the Sustainability Appraisal process

SA Stage A

1.4.1 *Task A1: Identifying other relevant plans, programmes and sustainability objectives.* This information is a continuous process to ensure that the assessment is based on the most recent information. The list has been kept under review to take account of any emerging relevant international, national, regional and local documents. The lists as they developed can be found in:

- The Core Strategy, Issues and Options Evidence Appendix, December 2005
- The Sustainability Appraisal Scoping Report, December 2005
- The Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- The Sustainability Appraisal Updated Scoping Report, June 2009

1.4.2 *Task A2: Collecting baseline information.* As above, this process is ongoing in order to ensure that the assessment of any emerging options is based on the most recent and up to date information. The three main iterations of the baseline information that supported the emerging Core Strategy can be found in:

- The Core Strategy, Issues and Options Evidence Appendix, December 2005
- The Sustainability Appraisal Scoping Report, December 2005
- The Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- The Sustainability Appraisal Updated Scoping Report, June 2009

- 1.4.3 *Task A3: Identifying sustainability issues and problems.* The main challenges which Hackney faces, and which the Core Strategy seeks to address will change where the baseline information evolves. Potential problems have also been kept under review through the development of the Core Strategy. These can be seen in:
- The Sustainability Appraisal Scoping Report, December 2005
 - The Core Strategy Preferred Options Sustainability Appraisal Report, April 2008
 - The Sustainability Appraisal Updated Scoping Report, June 2009
- 1.4.4 *Task A4: Developing the SA Framework.* This is where the sustainability objectives and relevant indicators are collected. This exercise was carried out by Hackney's Sustainability officer in March 2006. These lists appear in:
- The Sustainability Appraisal Scoping Report, December 2005
 - The Core Strategy Preferred Options Sustainability Appraisal Report, April 2008
 - The Sustainability Appraisal Updated Scoping Report, June 2009
- 1.4.5 *Task A5: Consulting on the Scope of the SA.* As part of the assessment process is essential to ensure that the SA evidence base and SA objectives are fit for purpose. The Environmental Consultation Bodies must be consulted so their expert advice can be fed into Core Strategy development and assessment process. Given the time that had passed since the original SA Scoping Report was created in December 2005, the Environmental Consultation Bodies were consulted again both by meetings with the Sustainability Appraisal Officers and via email in March 2009 to support the assessment of the Proposed Submission Core Strategy. This assessment is detailed by:
- The Sustainability Appraisal Scoping Report, December 2005
 - The Updated Sustainability Appraisal Scoping Report, June 2009

SA Stage B

- 1.4.6 *Task B1: Testing the Core Strategy objectives against the SA Framework.* Once the framework was agreed by the Environmental Consultation Bodies it was tested against the emerging plan objectives which evolved over time. The objectives were finalised at the preferred options stage and outlined in the following documents:
- The Core Strategy, Issues and Options Sustainability Appraisal Analysis, December 2005
 - Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
 - Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009
- 1.4.7 *Task B2: Developing the Core Strategy Options.* As discussed this process evolved over time. The options assessments can be found at:
- The Core Strategy, Issues and Options Sustainability Appraisal Analysis, December 2005
 - Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
 - Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009

1.4.8 *Task B3: Predicting the effects of the Core Strategy.* This is an iterative process which was undertaken in:

- The Core Strategy, Issues and Options Sustainability Appraisal Analysis, December 2005
- Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009

1.4.9 *Task B4: Evaluating the effects of the Core Strategy.* The emerging options were compared with each other and the baseline scenario were no Core Strategy to be put in place.

- The Core Strategy, Issues and Options Sustainability Appraisal Analysis, December 2005
- Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009

1.4.10 *Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects.* Where adverse impacts were identified, measures were developed outlining the best ways to mitigate these adverse impacts:

- Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009

1.4.11 *Task B6: Proposing measures to monitor the significant effects of implementing the Core Strategy.* Where significant adverse impacts were identified, measures were taken to monitor these so that action could be initiated where trends fall below acceptable levels... This is documented by:

- Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009

SA Stage C

1.4.12 *Task C1: The Preparation of the SA report.* A series of SA reports were prepared to take stock and make the position available to the public on how the emerging options fared in sustainability terms.

- The Core Strategy, Issues and Options Sustainability Appraisal Analysis, December 2005
- Core Strategy, Preferred Options Sustainability Appraisal Report, April 2008
- Core Strategy, Proposed Submission Sustainability Appraisal Report, June 2009

SA Stage D

1.4.13 *Task D1 & 2: Public Participation.* The Preferred Options Core Strategy and accompanying SA report went out to Public Participation between 14th April 2008 and 2nd June 2008. Under the amendment Planning Regulations of 2008 the Proposed Submission Core Strategy will be made available to the public in June 2009 along with the updated SA report. The SA report will be updated to take account of any alterations between this stage and the adoption of the Core Strategy. Documentation on who was consulted and how their views were taken into account in the development of the Core Strategy at both the issues and options and Preferred Options Stage can be found in:

- The London Borough of Hackney Issues and Options Consultation Report, April 2006
- The London Borough of Hackney, Preferred Options Consultation Report, June 2009

SA Stage E

1.4.14 *Task E: Monitoring the significant effects of implementing the Core Strategy.* The methods for monitoring and responding to adverse effects will be updated where appropriate to take account any changes to the Proposed Submission Core Strategy prior to adoption.

Compliance with the SEA Directive

1.4.15 The SEA Directive Annex 1 sets out certain procedural elements that must be followed. In particular, the SEA Directive requires the preparation of an Environmental report on the implications of the plan or programme in question. This report incorporates the information that must be included in the Environmental report. The table below demonstrates how the report conforms with the SEA Directive.

1.4.16 The draft Core Strategy has been prepared between 2005 and 2009. As described above, there are three discrete stages within this period. Firstly, the issues and options, secondly the preferred options and finally the current proposed submission stage, which is being published for representations. A list of these and the supporting SA Reports are set out below.

- The Core Strategy, Issues and Options Evidence Appendix, December 2005
- The Sustainability Appraisal Scoping Report, December 2005
- The Core Strategy, Issues and Options Sustainability Appraisal Analysis, December 2005
- The Core Strategy Preferred Options, April 2008
- The Core Strategy Preferred Options Sustainability Appraisal Report, April 2008
-
- The Core Strategy Preferred Options, Consultation Report, June 2009.
- The Core Strategy Proposed Submission Document, June 2009

- The Sustainability Appraisal Updated Scoping Report, June 2009
- The Core Strategy Proposed Submission Sustainability Appraisal Report, June 2009

Table 2: The SEA Directive requirements

The SEA Directive's Requirements	Section of the published Sustainability Appraisal Scoping Reports and Sustainability Appraisal Reports
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme are identified, described and evaluated. (Art.5 and Annex 1).</p>	<p>Issues and Options SA Analysis, December 2005 Preferred Options SA Report, April 2008, Proposed Submission SA Report, June 2009</p>
<p>An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.</p>	<p>Issues and Options SA Analysis, December 2005 (Appendix 1) Preferred Options SA Report, April 2008, (Appendix 1) Updated Scoping Report, June 2009 (All) Proposed Submission SA Report, June (Section 3)</p>
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>Issues and Options Scoping Report, December 2005 (Section 3.) Preferred Options SA Report, April 2008 (Section 4 Sustainability Appraisal Objectives, Baseline and Context) Updated Scoping Report, June 2009 (All) Proposed Submission SA Report, June 2009 (Section 3).</p>
<p>The environmental characteristics of areas likely to be significantly affected.</p>	<p>Issues and Options SA Scoping Report, December 2005 (Section 3) Preferred Options SA Report, April 2008 (Section 4 Sustainability Appraisal Objectives, Baseline and Context) Proposed Submission SA Report, June 2009 (Section 2). Updated Scoping Report, June 2009 (All)</p>
<p>Any existing environmental problems which are relevant to the plan or programme including, in particular, those relation to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.</p>	<p>Preferred Options SA Report, April 2008 (Section 4 Sustainability Appraisal Objectives, Baseline and Context) Updated Scoping Report, June 2009 (All) Proposed Submission SA Report, June 2009 (Section 2)</p>

	<p>Habitats Regulations Assessment, June 2009 (All)</p> <p>Strategic Flood Risk Assessment, Level 2, June 2009 (All)</p> <p>Proposed Submission SA Report, June 2009 (Section 2)</p>
<p>The environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>	<p>Issues and Options SA Scoping Report, December 2005 (Section 5)</p> <p>Preferred Options SA Report, April 2008 (Section 4, Sustainability Appraisal Objectives, Baseline and Context, Table 3 and Appendix 2)</p> <p>Updated Scoping Report, June 2009 (All)</p> <p>Proposed Submission SA Report, June 2009 (Section 2)</p>
<p>The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).</p>	<p>Issues and Options SA Analysis, December 2005 (Section Sustainability Considerations, Plan Issues and Options 2006)</p> <p>Preferred Options SA Report, April 2008 (Comparing plan policies against SA Objectives Appendix 6)</p> <p>Proposed Submission SA Report, June 2009 (Section 5, Appendices 2-7)</p>
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.</p>	<p>Preferred Options SA Report, April 2008 (Introduction 1.1.5 – 1.1.6, Section 5.4, and assessment table 8.2)</p> <p>Proposed Submission SA Report, June 2009 (Section 5, 6 and Appendices 2-7)</p>
<p>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>The Core Strategy, Issues and Options Evidence Appendix, December 2005</p> <p>Issues and Options SA Analysis, December 2005 (Section Sustainability Considerations, Plan Issues and Options 2006)</p> <p>The Local Development Framework: Progression of Hackney's Core Strategy Pre-Submission Preparation & Technical Appendix 1, September 2008 (All)</p> <p>Preferred Options SA Report, April 2008 (Section 5, Table 4 and Appendix 5)</p>

	Proposed Submission SA Report, June 2009 (Section 3& 5)
A description of measures envisaged concerning monitoring in accordance with Article 10.	Preferred Options SA Report, April 2008 (Introduction 1.1.5 – 1.1.6, assessment table 8.2, adverse effects identified for mitigating and monitoring at the Issues and Options assessment section 5.4, the adverse effects identified to me mitigated and monitored at the preferred options stage) Proposed Submission SA Report, June 2009 (Section 5)
A non-technical summary of the information provided under the above headings.	Non-Technical Summary Preferred Options SA Report, April 2008 Non-Technical Summary Proposed Submission SA Report, June 2009
The report must include the information that may reasonably required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2).	Preferred Options SA Report, April 2008 Proposed Submission SA Report, June 2009 Officer peer review, June 2009.
Consulting: Authorities with environmental responsibilities, when deciding on the scope and level of detail of the information which must be included in the environmental report (Article 5.4).	Issues and Options SA Scoping Report, December 2005 Updated Scoping Report, June 2009 Proposed Submission SA Report, June 2009 (Section 2, Section 4 & Appendix 8).
Authorities with environmental responsibilities and the public, to give them an early and effective opportunity within appropriate time frames to express their opinion on the draft plan and the accompanying environmental report before the adoption of the plan (Article 6.1, 6.2).	The Issues and Options and accompanying SA Report went out to consultation from 5 th December 2005 to the 28 th February 2006 The Issues and Options Consultation Summary Report, April 2006 The Preferred Options Core Strategy and accompanying SA report went out to Public Participation 14th April 2008 – 2nd June 2008. The Preferred Options Consultation Report, June 2009 (Section 2, 4 & Appendix 8). The Proposed Submission Core Strategy will be made available to the public in June 2009 along with the Proposed Submission SA Report for a period of six weeks.

<p>Other EU Member States, where the implementation of the plan is likely to have significant effects on the environment in these countries (Article 7).</p>	<p>As above.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Article 8).</p>	<p>Preferred Options SA Report, April 2008 (Introduction 1.1.5 – 1.1.6, Section 5.4, and assessment table 8.2.)</p> <p>The Local Development Framework: Progression of Hackney's Core Strategy Pre-Submission Preparation & Technical Appendix 1, September 2008 (All)</p> <p>Proposed Submission SA Report, June 2009 (Section 2 & Appendices 2– 7)</p>
<p>Providing information on the decision: When the plan is adopted, the public and any countries consulted under Article 7 must be informed and the following made available to those so informed:</p>	<p>This will occur through the Councils adoption statement which will be published and circulated as appropriate.</p>
<p>The plan as adopted A statement summarising how environmental considerations have been integrated into the plan and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken in the light of the other reasonable alternatives dealt with; and</p>	<p>The Issues and Options Consultation Report, April 2006</p> <p>The Preferred Options Consultation Report, June 2009</p> <p>The Proposed Submission Core Strategy Consultation Report will be completed to support the Examination.</p>
<p>The measures decided concerning monitoring (Article 9).</p>	<p>Preferred Options SA Report, April 2008 (Introduction 1.1.5 – 1.1.6, assessment table 8.2, adverse effects identified for mitigating and monitoring at the Issues and Options assessment section 5.4, the adverse effects identified to be mitigated and monitored at the preferred options stage)</p> <p>Proposed Submission SA Report, June 2009 (Section 5 & 6)</p>
<p>Monitoring: the significant environmental effects of the plan's implementation (Article 10).</p>	<p>Preferred Options SA Report, April 2008 (Introduction 1.1.5 – 1.1.6, assessment table 8.2, adverse effects identified for mitigating and monitoring at the Issues and Options assessment section 5.4, the adverse effects identified to be mitigated and monitored at the preferred options stage)</p> <p>Proposed Submission SA Report, June 2009 (Section 5 & 6)</p>
<p>Quality assurance environment reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>Preferred Options SA Report, April 2008</p> <p>Proposed Submission SA Report, June 2009 (Appendix 1)</p>

2 An overview of Sustainability Appraisal Stage A

Introduction

- 2.1.1 Stage A of the SA process involves gathering an evidence base of the current social, environmental and economic conditions in the London Borough of Hackney. This evidence is used to form the basis against which the sustainability effects of the Core Strategy can be assessed. The evidence is also used for drafting the Sustainability Appraisal Objectives (known as the 'SA framework') which form a baseline standard for the assessment process.
- 2.1.2 The SA framework and evidence base for the SA of the Core Strategy are documented in the Scoping Report which was completed in 2005. In order to successfully carry out an assessment of the Core Strategy, it is important the evidence base is kept up to date. As such, the Scoping Report was updated in 2009. The Updated Scoping Report (June 2009) comprises of 15 topic areas (population, human health, economy, employment and skills, transport, poverty and social exclusion, crime and safety, housing, cultural heritage, air, climate, soil & water, waste, landscape and townscape and biodiversity). Each topic area also includes the most relevant comments received in relation to the chapter area as a result of the Core Strategy Preferred Options Consultation period.
- 2.1.3 This section provides a summary of the current state of the social, environmental and economic environment in Hackney which supported the assessment of the Core Strategy Proposed Submission Core Strategy Document.

Stage A1: Context review

- 2.1.4 Stage A1 of the SA process involves establishing the context in which the LDF is being prepared i.e. the other policies, plans and programmes, strategies and initiatives that influence the content of the LDF and the opportunities and challenges they present. Establishing the sustainability context for the London borough of Hackney helps to provide a basis for predicting and evaluating effects and helps to identify sustainability problems.
- 2.1.5 An overview of Hackney's Proposed Submission Core Strategy and its relationship with other documents and strategies is set out in Section 3.

The Environmental report required under the SEA Directive should include:

“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”

and

“the environmental protection objectives, established at International, Community or Member State level, which are relevant to the plan or programme and the way those

objectives and any environmental considerations have been taken account during its preparation.”

Annex 1(a) and (e)

The Planning Act 2008

2.1.6 The Planning Act 2008 received royal assent on 26 November 2008. This set out the legislative framework for the new Infrastructure Planning Commission. ‘The Commission’. This new body will be responsible for granting consent to nationally significant infrastructure projects. The legislation marks an increase in national focus in securing the essential infrastructure to support any planned growth.

The London Plan

2.1.7 The LDF must be in general conformity with the strategic spatial and transport framework set out in the London Plan, the current version of which was published in February 2008. In particular, the LDF should seek to incorporate the housing requirements of the London Plan. This sets out a minimum of an additional 1,085 new dwellings per year from 2008 – 2018. The London Plan’s six objectives are:

- to accommodate London’s growth within its boundaries without encroaching on open spaces;
- to make London a better city for people to live in;
- to make London a more prosperous city, with strong and diverse economic growth;
- to promote social inclusion, and tackle deprivation and discrimination;
- to improve London’s accessibility;
- to make London a more attractive, well-designed and green city.

2.1.8 All policies in the London Plan are intended to support sustainable development, and Policy 2A.1 sets out the sustainability criteria. The over-arching spatial policies in the London Plan require Boroughs to have regard in their own development plans to the strategic designations, including Opportunity Areas (which have been identified as suitable for accommodating substantial numbers of new jobs or homes, or a combination of the two, together with appropriate infrastructure).

2.1.9 Opportunity Areas in Hackney are Bishopsgate/South Shoreditch and Lower Lee Valley/Stratford), which also include parts of other Boroughs. Areas for Regeneration relate to the 20% most deprived wards in London and cover virtually the whole of Hackney, minus the western and eastern extremities. Dalston is designated as a major centre, and Hackney Central, Stoke Newington and Finsbury Park as district centres. With regard to manufacturing and wholesale distribution, boroughs are charged with the identification of Strategic Employment Locations in the light of Policy 3B.5, which deals with criteria for designation, and Annex 2, which lists Hackney Wick as the sole site in the borough for a Primary Industrial Location. (There are ongoing discussions with the London Development Agency over the aspirations in the Hackney Wick Area however, in light of the Olympic Legacy Framework in regard to the potential of mixed use development).

- 2.1.10 The London-wide strategic picture is completed by considerations of transport issues and the sub-regional framework. With regard to transport, the key issue is to ensure it provides good access to essential services required by the community. The London Plan also seeks to illustrate how its spatial policies would interact at sub-regional level, although this point is elaborated in much greater detail in the relevant Sub-Regional Development Framework.
- 2.1.11 A broad indication of the direction of the revisions to the London Plan was circulated in May 2009. The London Borough of Hackney is currently preparing its response to this. Full public consultation is anticipated in autumn this year. The revised London Plan is due for publication in winter 2011 – 2012.

The 2012 Olympic Games

- 2.1.12 The approval in July 2005 by the International Olympics Commission of the bid to stage the 2012 Olympic Games in London followed the grant of planning permission for the Olympic Park and related facilities in the Lower Lee Valley. While only a comparatively small area in Hackney forms part of the Olympic Park, there are, nevertheless, wider implications for the borough. Three arenas for sports such as basketball, volleyball and handball are proposed on the area of Hackney Marshes south of the A102 (M) link road, and a coach park to the north east.
- 2.1.13 When the Olympic Games are over, the overall plans envisage an extensive legacy for the wider area. These include substantial, high quality sporting facilities, residential accommodation including affordable housing, and the creation of a substantial area of park and stretching southwards towards the Thames. Although most of these facilities and amenities will lie outside Hackney, another important part of the Olympics legacy – dramatically improved communications links - will give access by footpaths and cycleways to Hackney residents, particularly those in the south east of the borough.

The Eastern Sub-Regional Development Framework

- 2.1.14 The London Plan divides the city into five Sub-Regions. The Eastern Sub-Regional Development area covers the City of London, Hackney, Tower Hamlets, Newham, Barking and Dagenham, Havering, Redbridge, Lewisham, Greenwich and Bexley.
- 2.1.15 This Eastern Sub-Regional Development Framework sets out the strategic priorities for East London, and includes the delivery of the London element of the Thames Gateway development, regeneration and transport proposals, while recognising the links both with the other parts of the Thames Gateway area and the London / Stansted/Cambridge/ Peterborough growth corridor. Of particular relevance to Hackney are the planning implications of the successful 2012 Olympics bid, strategic transport proposals, especially the East London Line extension from Liverpool Street to Dalston and, in the longer run, Crossrail 2, which would link Dalston westwards with Paddington, as well as with Stratford to the east.

The Sustainable Community Strategy

- 2.1.16 The Local Development Framework is the ‘spatial expression’ of the Council’s Sustainable Community Strategy (SCS), 2008. The SCS sets out the long term vision and objectives developed by the council and its strategic partners such as health, education and police services.
- 2.1.17 The six principle objectives of the SCS are to:
- Reduce poverty by supporting residents into sustainable employment, and promoting employment opportunities;
 - Help residents to become better qualified and raise educational aspirations.
 - Promote health and wellbeing for all, and support independent living;
 - Make the borough safer, and help people feel safe in Hackney;
 - Promote mixed communities in well-designed neighbourhoods, where people can access high quality, affordable housing; and
 - Be a sustainable community, where all citizens take pride in and take care of Hackney and its environment, for future generations.
- 2.1.18 The GLA Act 2000 requires the Local Development Framework to be prepared in line with the Community Strategy. The London Borough of Hackney has prepared a Strategic Alignment Report to identify any gaps and inconsistencies with delivering these through the Local Development Framework. This document is available on the London Borough of Hackney website.

Preferred Options consultation responses

- 2.1.19 The principle responses of the preferred options consultation are summarised against each topic paper of the updated Scoping Report, 2009. Some of the likely responses that relate to each topic area are set out in Table 4 below.

Table 3: Key messages identified from the Preferred Options Consultation Stage on both the Core Strategy and Sustainability Appraisal

SA/SEA Topic Area	Preferred Options Response Respondee number & response
Population	No comments on population.
Health	12: Not enough indicators to monitor health 45: More consideration for the spatial implications for health. The work of the Council with the PCT will need to be integrated closely with the creation of the Core Strategy
Economy	9: Employment Priority Area is outdated in upper Clapton. Refer to the Employment Densities report for English Partnerships (July 2001) 17: The impending Statutory Economic Assessment Duty will be vital in insuring the

	planning department are well informed in terms of development.
Employment & Skills	<p>43: Recommended developing a new green economy around areas like Mare Street and Hackney Wick</p> <p>5: Would like to the protection and expansion of commercial land within a short walk of the ELLX stations.</p> <p>13: Protect and improve facilities at Ridley rd market.</p>
Transport	<p>57: Promoting walking and cycling.</p> <p>56: Developments with high car trip generation and/or no car parking provision should be located where the public transport accessibility level is high.</p>
Poverty & Social Exclusion	<p>14: No mention of facilities for the elderly or youth.</p> <p>73: Reduce number of people living in poverty.</p>
Crime and Safety	<p>27: 'Hidden' places should be identified and then improved with lighting. New designs should be aware not to create them.</p> <p>23: Where there are crime hotspots, a study should be commissioned as to how the planning process could feed into improving these hotspots.</p>
Housing	<p>44: Welcome the emphasis given tot eh creation of family housing but can't locate any clear guidance on this subject i.e. level of three bedroom plus accommodation to be achieved.</p> <p>26: The core Strategy must acknowledge the impact of market forces on the viability of affordable housing provision.</p>
Cultural Heritage	<p>62: Woodberry down has some key historic assets that should serve as anchors for future development.</p> <p>15: St John's Church and churchyard will be a pivotal part of the Hackney Central Area. The fabric and identify of the Hackney narrative are found within the church and churchyard, so far the role of Heritage to be celebrated can only lead into a more sustainable cultural identity.</p>
Air & Climate	<p>13: Waterborne transport of passenger and freight has a role to play in reducing traffic congestion and providing alternative non-car modes of transport, improving air quality.</p> <p>23: New development created should create at least 10% of its own energy. Greater provision of green Roofs which hold water for long periods of time.</p>
Soil & Water	<p>23: The Waterfront Development Zone is too far back from the waterfront. Very concerned by the reference in this paragraph to "Waterfront Developments Area" which comprises the whole length of the Lee and the Lee Navigation, the Regents</p>

	Canal and around the reservoirs.
Waste	23: There should be a zero waste strategy for dealing with residential waste. 13: The construction cycle for waterside development should be potentially serviced by the canal.
Landscape & Townscape	13: there is a need to the provision of more open space. 12: Butterfield common is a significant open space for local people today. Needs to be included in the key diagram map.
Biodiversity	28: There is an opportunity for Boroughs to integrate biodiversity into core service areas and this should be reflected in the Borough's Biodiversity Action Plan.

Other, plans, programmes, strategies and initiatives

2.1.20 A detailed list of the most recent and relevant plans, programmes and strategies is set out in the Updated Scoping Report, May 2009. Below is a summary of the full updated evidence base that supported the assessment of the Proposed Submission Core Strategy as including the updated list of policies, plans and programmes and sustainability appraisal objectives, a description of the social, environmental and economic baseline characteristics and predicted future baseline, the main social, environmental and economic issues and problems identified, limitations of information and assumptions made and the SA framework. It also includes considerations from the Preferred Options consultation period.

Table 4: Key messages for the Core Strategy identified in the Scoping Report and subsequent updates

The Core Strategy should seek to:

Deliver essential infrastructure to support planned growth and development. In particular promote the improvement of the railway corridors of the East London Line from Shoreditch High Street to Dalston, the North London Line from Hackney Wick to Dalston and the Chelsea to Hackney Line (Crossrail 2).

Create a new community in Hackney Wick as set out in the Olympic and Paralympic Games and Legacy Framework.

Support and actively generated economic growth in Dalston Hackney's major centre and Hackney Central, Stoke Newington and Finsbury Park the boroughs main district centre in line with the London Plan.

Promote and encourage the Strategic Employment Location in the Hackney Wick Area as set out in the London plan.

As set out above, there is a regional policy discrepancy between the London Plan and Olympic and Paralympic Games and Legacy Framework on the extent and level of employment growth

appropriate in the Hackney Wick Area which is currently under discussion. More detailed SA analysis on the various options here is being undertaken in parallel with the Proposed Submission Core Strategy. Much of this will form part of the evidence base for the Area Action Plan for Hackney Wick and Fish Island.

Promote economic growth including commercial and cultural growth in Shoreditch which forms part of London's Central Activities Zone as set out in the London plan.

Promote the delivery of Woodberry Down (a demonstration project for CLG) the largest housing regeneration scheme in the UK.

Deliver a minimum of 1, 085 houses a year from 2008 – 2018 as set out by the London Plan.

Reduce the high levels of deprivation in Hackney. In 2007 the borough was ranked by the Indices of Multiple Deprivation as having the 2nd highest levels of deprivation in the UK

Improve overall air quality in the borough , reduce greenhouse gases emissions and adapt to climate change already underway.

Develop renewable energy sources and incorporate renewable energy projects in new developments, including new Town Centre development.

Incorporate waste and recycling strategies into new developments and encourage reuse, recycling and recovery of waste.

Prioritise previously developed brownfield sites

Protect open space and recreational facilities.

Protect Regional and locally protected habitats and species (SINCs) within Hackney and the neighbouring Lea Valley SPA and Walthamstow Reservoir SSSI.

Ensure that all development takes account of flood risk and include sustainable design and construction such as SUDS to tackle both fluvial and pluvial flooding and improve water quality.

Reduce crime in the borough and fear of crime. Encourage developments that 'design out' crime and reduce the fear of crime.

Improve safety on Hackney's roads. Reduce car dependence by supporting walking and cycling and improving public transport linkages.

Ensure jobs, shopping, leisure facilities and services are accessible by public transport.

Protect the historic environment and secure increased access where possible. Protect the archaeological priority zones within the authority. Protect Hackney's designated strategic view in South Shoreditch.

Improve the provision of, and access to community facilities to meet the demands in the borough.

Improve educational attainment in Hackney

Improve health and access to healthcare facilities, including specialist facilities needed in the borough.

Stage A2: Baseline information

- 2.1.21 The collection of baseline information is a key component of the SA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting and monitoring effects. Assembling baseline data also helps to identify sustainability problems.
- 2.1.22 The whole of Hackney borough is likely to be significantly effected by the Core Strategy. Below is a summary of what is estimated to be the most relevant social, environmental and economic conditions to the emerging plan. A brief analysis of the predicted effects in absence of the Core Strategy is also provided.
- 2.1.23 The SEA Directive's requirements in relation to baseline information are:

The environmental report required under the SEA Directive should include:

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”

“the environmental characterises of areas likely to be significantly affected”.

Annex 1(b) and (c)

The evolutions without The London Borough of Hackney's Core Strategy

- 2.1.24 The central part of the Local Development Framework is the Core Strategy. Without the adoption of the Core Strategy the Area Action Plans, and other related Development Plan Documents and Supplementary Planning Documents could not be produced. The inability for the Core Strategy to be adopted would result in a gap in up-to-date statutory policy, both strategically for Hackney and for each of the areas of growth within the borough.
- 2.1.25 Current Planning policy operates on the saved policies from the Unitary Development Plan, 1995 and supplementary planning documents produced using these saved policies as a base, and the London Plan.
- 2.1.26 The absence of a strong, locally specific statutory aligned Local Development Framework, led by the Core Strategy would result in an inability to implement strategic solutions to manage growth, to meet regional and national targets and to improve the quality of life of Hackney's residents.

Table 5: Future baseline without the plan – the business as usual scenario

Economic development	The current global recession has hit the entire country and economic growth will be stunted for some time as a result. Without intervention to drive forward enterprise locally, the potential to improve Hackney’s economy would be extremely limited, given the levels of deprivation in the borough, .
Population	The population of Hackney is expected to increase by 15.6% (33,533) by 2026. This will place a greater demand on the provision of housing and social infrastructure such as schools and hospitals. . In addition, Hackney will see a continued increase of ethnic populations moving to the borough, particularly from non-english speaking countries which could increase the demand for specialist services such as translators
Health	Life expectancy in Hackney has been slowly increasing. This is likely to continue based on past trends. Mortality rates from circulatory disease and cancer have fallen in the past 10 years but remain higher than the average rates for London and the rest of the UK, and this situation is unlikely to change in the near future. Without the provision of adequate new health facilities to meet current and future predicted needs (due to population increases), statistically, average levels of population health in Hackney may decline further, in comparison to national standards.
Educational attainment	Residents of Hackney have a relatively low level of educational attainment when compared with London and the rest of the country. The weekly wages of those living in Hackney is almost half that of those working full-time in the London area, which suggests that residents are short of skills to access employment, especially highly skilled jobs. The absence of Core Strategy policies to support economic growth, with supporting educational infrastructure is likely to result in further decline.
Transport	Planned London Overground railway improvements are being delivered in parallel to the Core Strategy. However, failure to manage the anticipated growth in light of the transport improvements would be likely to generate adverse environmental impacts. About 44 percent of Hackney’s population is dependent on the private car. Although lower than the national average, without strategic policies to increase accessibility to new facilities via non-car movement, this percentage would be likely to increase.
Poverty & social exclusion	Hackney is one of the most deprived authorities in the UK. The absence of a strong planning framework to improve the access to healthcare, education, community facilities and employment opportunities to enable reduce poverty and social exclusion and improve resident’s lifechances would be likely to result in further decline.
Crime	It has been reported that crime levels are generally higher in Hackney compared to many other London boroughs. It was noted people who live, work or visit Hackney don’t feel safe to walk on the street especially after dark. Improvements are necessary in regard to the factors contributing to crime (such as unemployment and low educational attainment) are a necessity. New built development should also include the principles of ‘Design out Crime’.
Housing	Although Hackney is meeting its current London Plan housing targets, the absence of Core Strategy policies to drive this forward may see a decline in performance There has been an increasing demand for one bed flats, 3 or more bedroom houses and affordable housing. This is coupled with the demand for sustainable design and construction standards to be met. Currently Hackney is not delivering against all of these priorities and a Core Strategy policy is necessary to drive the priorities

	forward.
Cultural Heritage	Current challenges to the historic and archaeological environment include planned estate renewal projects, which overlap in areas of archaeological priority and redevelopments in Hackney Central, where there are a number of listed buildings. Absence of a Core Strategy policy which sets out a strategic locally specific position on growth which respects both the areas of conservation and archaeological priority areas of priority will greatly increase the risk of decline of Hackney's cultural heritage
Air quality	Air Quality has declined over recent years. The absence of a policy position to concentrate development around key transport nodes, and managed industrial activities may result in further deterioration in air quality
Climate	Hackney current has the lowest average carbon emissions of any London Borough. This position will be challenged by the predicted growth, in particular population growth. Support for technological solutions (e.g. zero carbon development, SUDS and green roofs), as well as behaviour change (car free lifestyle) to stabilise and reduce emissions over time is seen as the best way forward. Strong local strategic policy is likely to reduce the risk of decline. The Level 2 Strategic Flood Risk Assessment has been undertaken to inform the Core Strategy and SA baseline. Strong strategic policies are seen as the only way in which the current identified risks can be managed.
Soil and Water	There could be some negative effects on existing river quality due to construction works or runoff from development adjacent to the river. In the absence of the Core Strategy, existing uses near the river or canals, in particular industrial uses in Hackney Wick may further degrade the water quality.
Waste	Given the growth anticipated, it is likely that the amount of waste that needs to be sustainably managed will increase. This could potentially affect trends in waste management. This may lead to a 'no improvement' or 'decline' in our performance against waste and recycling targets.
Landscape and Townscape	The absence of a Core Strategy may result in no improvements or continued decline in the urban environment where fear of crime and poor access, particularly for those with disabilities is existant. There may also be continued open space deficiency for residents in the Dalston, Hackney Downs, Cazenove, Hackney Central, Lordship and New River wards.
Biodiversity	Without a robust strategic policy framework, working in partnership with the Local Strategic Partnership, a decline of identified Biodiversity Action Plan priority habitats and species identified at regional, local and borough levels would become more likely. A decline in identified sites of importance for nature conservation at metropolitan, local and borough importance may also occur. Significant effects may occur due to unmanaged urbanisation upon the Lea Valley SPA and Walthamstow reservoir SSSI

Stage A3: Sustainability issues

- 2.1.27 Stage A3 involves drawing on the most relevant evidence gathered at stage A1 and A2 to identify those sustainability issues that are most pressing. The sustainability issues identified then form the basis for developing a robust SA framework (Stage A4). These issues provide useful evidence to inform the judgement of effects

against the SA Framework at the assessment stage. The requirement to identify sustainability issues arises from the SEA Directive:

2.1.28 The 'Environmental Report' required under the SEA Directive should include:

“existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the Birds Directive) and 92/43/EEC” (The Habitats Directive).

Annex 1 (d)

2.1.29 Table 6 below lists the economic, social and environmental problems facing the London Borough of Hackney.

Table 6: Sustainability Appraisal issues and problems in Hackney

Sustainability Appraisal topic areas	Issues and problems
Protecting and enhancing biodiversity, flora and fauna in the borough	Regional and locally protected habitats and species within Hackney and the neighbouring Lea Valley SPA and Walthamstow Reservoir SSSI may decline as a result of the great deal of growth anticipate in the borough especially in relation to cumulative impacts of development anticipated in the Olympic Legacy Developments, Dalston, Hackney Central, Hackney Wick, Woodberry Down and South Shoreditch.
Ensuring efficient use of natural resources	There could be some negative effects on existing river quality, due to construction works or surface runoff from development adjacent to the river including the planned Olympics development.
Improving Hackney's poor air quality	The majority of Hackney lies in an Air Quality Management Area. In 2003, levels of nitrogen dioxide exceeded the recommend levels. In 2003, Levels of Particulate matter (PM10) also exceeded recommended levels.
Minimising flood risk and encourage Sustainable Urban Drainage Systems (SUDS) for new developments	Areas of Hackney Wick fall within Flood Zone 3. Approximately 2,650 properties fall within Flood Zone 2 and 1,400 in Flood Zone 3.
Reducing the need to travel and encourage use of public transport including walking and cycling	Hackney has good bus links and is served by 59 bus routes, nine of which are in the twenty most populated in London. However it has limited tube and rail links. Existing stations report the need for upgrades and safety improvements. Safety and accessibility on roads for cyclists are sought. The existing transport system may no longer be sufficient to accommodate the increasing travel demands on tpublic transport access and car uses. As a result of this, there are travel constraints

	<p>which have led to congestion, air and noise pollution in the borough.</p> <p>Currently Hackney has lower than average car ownership when compared to London and National average ownership figures.</p>
Reducing greenhouse gas emissions and promote the efficient use of energy in all activities	<p>Hackney's Borough Profile, 2006 set out that CO2 emissions are amongst the lowest in London ranking 29th out of the 33 London Boroughs. By 2008 it was the lowest.</p> <p>However general air quality in the borough is poor as most of the Borough lies within an Air Quality Management Area.</p>
The need to promote sustainable design	<p>Sustainable design and construction techniques present an additional cost to developers and are sometimes hard to negotiate on schemes where land value is lower than other London boroughs and where 50% affordable housing including three bedroom houses are sought. There are currently no flagship examples of zero carbon development in the borough.</p>
Preserving the historic environment and other archaeological aspects of the borough	<p>Potential threat to conservation areas and the buildings at risk from the proposed development and its subsequent constructional activities.</p> <p>There is a protected strategic view in South Shoreditch and designated areas of archaeological priority in the borough.</p>
Reducing poverty and social exclusion and promote cultural diversity	<p>The DCLG Indices of Multiple Deprivation 2007 ranked Hackney as the 2nd most deprived Local Authority out of 354 in England and Wales.</p> <p>At September 2008, average benefit claimant count rates in Hackney were substantially higher than both the London and England averages, and the second highest in London.</p> <p>Almost twice as many men were claiming jobseeker's allowance compared to the national average.</p>
Reducing open space deficiency and increase access to quality open spaces.	<p>Continued open space deficiency for residents in Dalston, Hackney Downs, Cazenove, Hackney Central, Lordship and New River wards.</p>
Improving the health of the people and promote healthy lifestyle	<p>Hackney's male life expectancy is 1.95 years short of the average national life expectancy.</p> <p>Hackney has a higher proportion of people who suffer from mental illness and tuberculosis, HIV infections, infant mortality and obesity compared to the London and national average.</p>
Improving educational attainment and the skill level of the population	<p>Residents in Hackney have a relatively low level of educational attainment compared with London and the rest of the country.</p> <p>In 2006, the weekly wages of those living in Hackney were rated almost two times lower than those working in the rest of London.</p>
Reducing crime, anti-social behaviour and fear of the crime in the borough	<p>In 2007/8 Hackney had the 7th highest crime rate within the capital, based on the total number of offences reported to the Metropolitan Police.</p>
Increasing the number of	<p>The five year total delivery breakdown of 1,297 new net dwellings</p>

decent and affordable houses	<p>shows that Hackney has an adequate supply of housing in the pipeline during the period of April 2007 and March 2012 to meet current London Plan targets of 1,085 new net dwellings per annum.</p> <p>There are viability issues in the borough about delivering 50% affordable housing along with meeting the demands for three or more bedroom houses and high standards of sustainable design and construction across the borough.</p> <p>It is estimated that Hackney will need an additional 13 to 34 new pitches for Gypsies and Travellers by 2017.</p> <p>Disparity between the cost of housing and the average earnings in Hackney means many residents are unable to afford to buy their own homes.</p>
Providing access to an adequate range of support and community facilities	<p>Hackney has lower than average standards of health and education and higher than average levels of crime. There is a need to increase social infrastructure tailored to tackle these problems in the borough.</p>
Minimising waste and maximize recycling in the borough	<p>Hackney is achieving its current waste and recycling targets. Hackney has sufficient waste handling capacity to meet projected apportionment and self sufficiency targets set out in the London Plan.</p>
Promoting sustainable economic growth	<p>According to the Office for National Statistics economic activity rates in Hackney are lower than those in the rest of London and great Britain. Average wages for those living in Hackney are much lower than those working in the Borough but living elsewhere.</p> <p>Only 57% of Hackney's female working age population is economically active, compared to 74% nationally.</p> <p>According to the Office for National Statistics, vacancy rates in the Borough for commercial and industrial properties reveal that the proportion of vacant property has decreased in the past few years, whilst the general trend for both London and England has been a general increase.</p>
Generating employment opportunities for everyone	<p>Levels of unemployment are almost double the average for London and rest of the UK, although there was a steady decrease in the number of unemployed people between 2005 and 2008.</p> <p>Declining industrial sectors and under-representation of growth sectors is a contributor to the high unenployment rates in Hackney</p>

Stage A4: Developing the SA Framework

- 2.1.30 The SA framework consists of SA objectives and indicators. They represent the aspirational objectives for sustainable development. They form a benchmark against which to assess the effects of the plan.
- 2.1.31 This SA Report is based on a topic-led approach. The sustainability topics including those specified under the SEA Directive (population, health, education, employment, poverty and social exclusion, equalities, crime, transport, housing, the historic environment, air quality and climate, flooding, soil and water, waste, landscape and townscape and biodiversity) were subject to a chapter in the

Scoping Report. The plan is tested against each of these topics and related evidence. The Updated Scoping Report 2009 updated the associated indicators which formed part of the SA framework, originally developed in 2005. The relevant SA objectives and indicators to each topic area were considered and allocated as appropriate.

- 2.1.32 SA objectives, topic areas and associated evidence formed the assessment matrix where the potential impacts of the plan were gauged.

Table 7: 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

3 Hackney's Proposed Submission Core Strategy

3.1 Introduction

3.1.1 The statutory spatial development plan for the London Borough of Hackney is called the Local Development Framework. (LDF). This is made up of a portfolio of documents, including the Core Strategy DPD. The Core Strategy is the principle document in the LDF and once adopted, will set out the Council's vision and spatial strategy for the future development of the borough. The other documents contained in the LDF must be in general conformity with the Core Strategy. The London Borough of Hackney has reached the stage where the Proposed Submission draft can be published. The main components of the Core Strategy Document are:

- The Spatial Portrait and Context
- Vision and Objectives
- Delivering Sustainable Growth
- Supporting Neighbourhoods and Communities
- A Dynamic and Creative Economy
- Providing Better Homes
- Cleaner, Greener and Safer Places
- Climate Change and Environmental Sustainability

3.1.2 The Core Strategy proposal map is the spatial expression of the Proposed Submission Core Strategy policies. The implications of the designations set out in these policies have been subject to assessment in SA terms.

3.1.3 The Core Strategy objectives and policies have been developed in an iterative fashion, integrating the SA findings. As part of this process of the plan development in recognition of the requirements of the SEA Directive, the London Borough of Hackney has suggested possible alternatives to the issues and options and preferred options put forward.

The SEA Directive states the following regarding the consideration of the plan alternatives:

"Where an environmental assessment is required ... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated...'
The environmental report should include "an outline of the reasons for selecting the alternatives dealt with."

Article 5 (1) and Annex 1 (h)

3.1.4 The Proposed Submission Core Strategy focuses on the appraisal of the significant changes that have been made to the draft Core Strategy since the preferred

options stage. The appraisal has focused on the Core Strategy objectives and policies. The Implementation Plan has not been appraised, but rather its implications have been taken in account as part of the wider appraisal.

The Core Strategy objectives

- 3.1.5 The Core Strategy Objectives have evolved from those set out in the Core Strategy Preferred Options Documents. To ensure there are no conflicts with the SA objectives they have been reappraised against the SA framework. This is summarised in Section 5.

Growth locations

- 3.1.6 The London Borough of Hackney have chosen to pursue a strategy that will manage the anticipated growth in the authority, both based on the GLA projections and the Council's own projects which are higher further to the Mayhew Associates Ltd, 2008. The strategy for growth is believed to be in overall alignment with the aims and objectives and the minimum requirements of the London Plan.
- 3.1.7 The Sustainability Appraisal on the Core Strategy from the Issues and Options Stage assessed the best ways of delivering the growth in the designated areas and did not seek to reassess alternatives to the areas allocated to accommodate this set out in the London Plan.

CLG Sustainability Appraisal Guidance of Regional Spatial Strategies and Local Development Documents, 2005 states:

"They [RPB's and LPA's] are not required to justify national planning policy when conducting SA's, for example by appraising alternatives to national policy".

(Introduction, P.14)

"at different stages of the preparation of a RSS revision, DPD, or SPD, information from earlier appraisals can be used,."

(Introduction, P.15)

"A wider range of options will be available at a regional level than at a local level, and decisions made at the higher 'level' will close off some options."

(Appendix 11, p126)

- 3.1.8 All growth options at the Issues and options, Preferred options and proposed Submission stages have been assessed against 'the business as usual/ no plan or programme scenario' to ensure that any sustainability implications of delivering the anticipated growth, based on the most recent evidence have been fully taken into account. This has allowed for measures to improve sustainability performance and to avoid and/or mitigate any potential significant effects can be taken put in place.

Opportunity Area in North East London – Bishopsgate/South Shoreditch

- 3.1.9 The London Plan's Sustainability Appraisal Report, 2004 table 5.2 and assessment matrix 5a – 5f outlines the sustainability implications of the Opportunity Areas in North East London designated under policy 5C.3. This includes the City Fringe (Bishopsgate/South Shoreditch). The Report advocated this area as well as the Isle of Dogs, the Lower Lea Valley including Stratford, the Royal Docks, London Riverside and Ilford represented the most appropriate areas to maximise residential and non-residential densities and to contain mixed uses. It sets out the recommendation for South Shoreditch to achieve the employment capacity of 80,000 Ha and 5, 000 new homes between the periods of 2001 – 2026.
- 3.1.10 Policy 2A.5 and 2A.1 Opportunity Areas and Areas for Intensification Map also designates Bishopsgate/South Shoreditch as an opportunity area. The Sustainability Appraisal evidence to support this option against other regional alternatives is documented in assessment matrix 2a.1.

Primary Employment Led Growth Location: Hackney Wick

- 3.1.11 Table A2.1 Preferred Industrial Locations (PIL) sets out that Hackney Wick in part is the regional preference for this type of employment growth of B2 (general) and B(8) (industrial uses). The regional evidence for this is outlined in the Sustainability Appraisal of the London Plan Assessment Matrix 2a.1.

Primary Housing Growth Locations: Hackney Wick & Woodberry Down

- 3.1.12 Woodberry Down is one of the most significant housing regeneration projects in the UK. It is a product of a National Demonstration Project selected by the Department for Communities and Local Government (CLG), and the Government Office for London (GOL) in January 2007. The Woodberry Down project is well underway and the Consultation Strategy was undertaken in July 2007.
- 3.1.13 The London Thames Gateway Development Corporation is overseeing the Legacy of the Olympic and Paralympic Games. This aims to ensure lasting benefits to the participating east London authorise following the Olympic and Paralympic event. This proposed opportunities for new housing and commercial development.

Primary Town Centre Growth Locations: Dalston, Hackney Central, Stoke Newington & Finsbury Park

- 3.1.14 The London Plan Table A1.1 Town Centre Classifications sets out that Dalston is a major town centre and it is also classified as being an important cluster of night time economy uses.
- 3.1.15 Table A1.1 also sets out that Hackney Central (Mare Street), Stoke Newington (High Street) and Finsbury Park (jointly with Haringey and Islington) as a district centres also containing important clusters of night time economy uses.

- 3.1.16 The sustainability evidence for this is set out in the London Plan, Sustainability Appraisal matrices 2a.and 5a – f.

3.2 Options appraisal

- 3.1.17 As discussed above the assessment process focused on considering options which may best deliver the strategic growth options enshrined in regional policy. From the issues and options to the proposed submission Core Strategy large range of options were considered and analysed.
- 3.1.18 Please refer to the Core Strategy, Issues and Options Evidence Appendix, December 2005, The Issues and Options SA Analysis, December 2005 The Local Development Framework: Progression of Hackney's Core Strategy Pre-Submission Preparation & Technical Appendix 1, September 2008 and the Preferred Options SA Report, April 2008 for the full details of how the options were developed in parallel with the SA. Below sets out some of the primary options that were considered in this period.

Managing Town Centre Growth

- Promote the expansion of retail development within existing town centres
- Encourage expansion of retail development throughout the borough.
- Allow the managed expansion of the visitor and night-time economy where there is no significant loss of residential amenity.
- Restrict any new uses associated with the visitor and night time economy by limiting expansion in town centres and areas of saturation in order to reduce its impact.

Delivering Affordable Homes

- Promote mixed tenure housing with varying room size in all residential development
- Develop varying requirements of tenure and room sizes based on identified need.
- Clearly prioritise housing development over the protection of employment land throughout the borough
- Promote a balanced approach whereby employment land is afforded different levels of protection based on quality and location
- Maximise development of underutilised land including estates and brownfield sites, town centres and transport interchanges
- Increase residential densities throughout the borough.

Building Height

- Restrict the height of all new development buildings
- Permit tall buildings in specific area with good public transport access and where the urban context is suitable.

Building Design

- Require all developments to achieve the highest design quality

- Permit varying standards of design based on the use/tenure of buildings

Delivering Community Facilities

- Concentrate community facilities in areas with the highest level of high public transport accessibility to serve borough wide need
- Disperse investment and community facilities throughout various neighbourhoods where there is demonstrated local need

Sustainable Transport

- Promote sustainable transport (i.e. bus, train, walking and cycling) over all other modes of transport
- Promote a balance between the use of private vehicles (i.e. cars) and sustainable transport.

Protecting Open Space

- Maintain access to the highest quality open space while allowing smaller pockets of open space to be developed for housing
- Protect all existing open spaces and improve access to and maintenance of them, whilst seeking expansion of open space particularly in areas of deficiency.

3.3 The Core Strategy Proposed Submission Document policies

Table 8: The Final List of Submission Core Policies

<p>Core Strategy Proposed Submission Draft Policies</p> <p>Delivering Sustainable Growth</p> <p>Policy 1: Growth Locations</p> <p>Policy 2: Improved Railway Corridors</p> <p>Policy 3: City Fringe: Shoreditch</p> <p>Policy 4: Woodberry Down New Community</p> <p>Policy 5: Hackney Wick New Community</p> <p>Policy 6: Transport</p> <p>Policy 7: Locating Infrastructure</p> <p>Supporting Neighbourhoods and Communities</p> <p>Policy 8: Focusing Social Investment</p> <p>Policy 9: Investing in Education</p> <p>Policy 10: Lifelong Learning</p> <p>Policy 11: Health Investment and Infrastructure</p> <p>Policy 12: Health and Environment</p> <p>A Dynamic and Creative Economy</p>
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Policy 13: Town Centres
Policy 14: Street Markets
Policy 15: Night-Time Economy
Policy 16: Employment Opportunities
Policy 17: Economic Development
Policy 18: Promoting Employment Land

Providing Better Homes
Policy 19: Housing Growth
Policy 20: Affordable Housing
Policy 21: Supporting Housing Requirements
Policy 22: Housing Density
Policy 23: Provision for the Gypsies and Travellers

A Safer, Cleaner and Greener Place
Policy 24: Design
Policy 25: Historic Environment
Policy 26: Open Space Network
Policy 27: Biodiversity
Policy 28: Water and Waterways

Climate Change and Environmental Sustainability
Policy 29: Resource Efficiency and Reducing Carbon Dioxide Emissions
Policy 30: Low Carbon Energy, Renewable Technologies and District Heating
Policy 31: Flood Risk
Policy 32: Waste
Policy 33: Promoting Sustainable Transport

4 The Appraisal methodology

4.1 Introduction

- 4.1.1 This chapter sets out the methodology for the appraisal, as required by the SEA Directive.

The Environmental report required under the SEA Directive should include:

“A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”.

Annex 1 (h)

The appraisal was carried out using the SA/SEA objectives as developed and documents in the Scoping Report, 2005. The SA framework consists of twenty objectives and the most recent and relevant indicators and targets. The assessment matrix is formulated to include these alongside the fifteen topic areas. The Core Strategy objectives and policies were assessed against these. There were two iterations of assessment May 2009 and June 2009.

The appraisal was a qualitative exercise based on professional judgement. The performance of the policies against each objectives was given a score according to the criteria set out in table 8 below.

When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivities of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects
- Cumulative nature of effects;
- Magnitude and spatial extent of the effects; and
- Value and vulnerability or area likely to be affected.

Table 9: Assessment scoring

Scoring 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 dependant 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 dependant 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.

Table 10: Effect analysis

Likelihood	High: H Medium: M Low: L
Timescale	Short: S Medium: L Long: L
Permanence	Temporary: T Permanent: P

4.1.2 The appraisals were documented using assessment matrix. The matrix includes space for commentary on significance and uncertainty of predicted effects, as well as suggestions for mitigation of negative effects and enhancement of positive effects. Table 11 below shows an example of this proforma. The completed matrices are provided in this report.

Table 11: Example of the assessment matrix

Option/Policy						
SA/SEA Objectives and relevant baseline.	Description of effect	Likelihood	Timescale	Permanence	Significance	Avoidance/mitigation/enhancement
SA/SEA Topic						

4.1.3 The matrix and approach to this assessment has been based on best practice SA/SEAs in 2008 listed in the Levett-Therivel website (http://www.levett-therivel.co.uk/index_files/SEAreco08.htm) In addition a consortium of SA/SEA experts have produced an article this year recounting the experiences so far in carrying out SA/SEA's within the English planning system. 'Sustainability-focused impact assessment: English experiences', Riki Therivel, Gemma Christian, Claire Craig, Russell Grinham, David Mackins, James Smith, Terry Sneller, Richard Turner, Dee Walker and Motoko Yamane (<http://www.levett-therivel.co.uk/>) It sets out some pitfalls to be avoided as part of the assessment process. Below are the principal points in this article and the measures the London Borough of Hackney have taken to try to avoid these pitfalls.

Table 12: Sustainability-focused impact assessment: English experiences: A summary of the key pitfalls identified in methodologies in 2008

Assessment Issues	Example following further to a review of 45 Sustainability Appraisals	Measures taken
Bias	Failure to identify Impacts. Example: "I think it achieves fairly neutral outcomes. Social issues are addressed quite strongly in the Core Strategy, and there is a strong emphasis on regeneration and the environment."	Assessment tables were reviewed in June 2009 to ensure bias was avoided.
Untested assumptions and mitigation	Assumption policies will be fully implemented. Using mitigation to upgrade SA/SEA outcomes Example: "The SA/SEA to a rating beyond neutral. The findings on a Core strategy policy on housing growth outlined "Given that the policy phases the release of land for development, particularly for housing this will protect Greenfield sites and thus during the plan period is likely to cut the effects on biodiversity, flora and fauna, landscape, soil resources and quality, reducing	Assessment tables were reviewed in June 2009 to ensure mitigation was not used to update SA outcomes or that assessment were not based on the assumption that policies would be fully implemented.

	contributions to climate change”.	
Not identifying what constitutes as a ‘high level of protection of the environment’	Not ensuring a high level of protection of the environment. Example: “On waste produced by 10, 850 + new dwellings to be built between 2007 – 2016 it was concluded more housing will generate more waste, not whether the waste could be managed in a way that would not breach limits for air quality, water quality etc.”	Assessment tables were reviewed in June 2009 to ensure a high level of protection of environment was maintained in the assessment of the policies.
Only partly contributing to the integration of environmental sustainability considerations into the prepare.	Not using the SA process to improve the plan. Following interviews undertaken with fourteen planners the main conclusions are that the process did help to test whether the plan was sustainable but often only resulted in a few changes. Example “Although small alterations were made [to our core strategy] as a result of the SA findings, most decisions were not impacted. We mostly carried out the SA to ensure that there could be no legal challenge.”	The London Borough of Hackney held one-to-one meetings with each policy author throughout May to discuss the findings of the assessment of their chapter areas and avoidance and mitigation measures (documented through email correspondence).

4.2 Integration with other assessments

The Habitats Directive Regulations Assessment

- 4.1.4 The need for Appropriate Assessment is set out within Article 6 of the EC Habitats Directive 199H, and interpreted into British law by Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007). The ultimate aim of HRA is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 4.1.5 The Habitats Directive applies the precautionary principle to protected areas (Special Areas of Conservation, SACs and Special Protection Areas, SPAs, collectively known as European sites and which comprise the Natura 2000 pan-European network).
- 4.1.6 The London Borough of Hackney commissioned Scott Wilson to undertake a Habitats Regulations Screening Assessment in April 2008, and a full Habitats Regulations Assessment in May 2009. This process was undertaken in consultation with Natural England. The measures set out in the report to minimise combined effects of urbanisation should accompany any future anticipated growth to reduce any impacts on the Lea Valley SPA, the Walthamstow Reservoir SSS1 in particular have been referenced within the SA assessment findings which are summarised in Section 5 below.

The Equalities Impact Assessment

- 4.1.7 The London Borough of Hackney Equalities team have an established process of carrying out Equality Impact Assessment (EqIA) on Council documents as appropriate. The EqIA on the Core Strategy Proposed Submission Document was prepared jointly with the Council's Equalities team and the Planning Policy team. This is available on the London Borough of Hackney website. The findings of the EqIA have been integrated and referenced into the SA assessment findings summarised below. In addition, the assessment matrix discussed above in section 4.1 included an 'equalities' section to ensure that equalities issues were considered in the assessment of every policy throughout the process.

Strategic Flood Risk Assessment

- 4.1.8 Mouchel Consultants carried out a joint North London Strategic Flood Risk Assessment (SFRA) Level 1 published in August 2008. The London Borough of Hackney commissioned Scott Wilson to carry out the SFRA level 2 in May 2009. The document has provided sufficient evidence to support the Proposed Core Strategy Proposed Submission Document policies (documented by email correspondence and minutes from meetings with the Environment Agency, see Appendix 1). This evidence base work is ongoing to provide the additional information required on the flood risk areas 2 and 3 to inform the development of detailed policy options in the Hackney Wick Area. This work is being carried out as part of the development of the Hackney Wick Area Action Plan.

4.3 Difficulties encountered and assumptions made

Uncertainties/risks

- 4.1.9 The Core Strategy policies need to be implemented in combination with each other. Key growth area polices need to be delivered in conjunction with the supporting social, green infrastructure policies for example i.e. Hackney Central & Focusing Social Investment & Renewable and Low Carbon Energy Development and so on. There is a risk of significant adverse impacts being incurred where certain policies are cherry picked at implemented stages and delivered in isolation.
- 4.1.10 The adoption of the Core Strategy does not mark the end of this project but rather the beginning of the process of implementing our spatial growth agenda to 2026. Policy performance is reliant on successful Core Strategy implementation. As such, the sustainability of the growth agenda hangs on the delivery of the Local Development Framework (LDF) which must be capable of operating as a single consistent and coordinated planning framework. This framework requires the Proposed Submission Core Strategy policies to be delivered in conjunction with each other and other relevant DPDs and SPDs. Identified problems with current SPDs however may inhibit this. This may include the current S106 SPD (only one health contribution has ever been made) and South Shoreditch SPD (based on London plan policy in absence of a Core Strategy).
- 4.1.11 Teams with principal responsibility for delivering the LDF include: The Local Strategic Partnership, (known as Team Hackney) and within Hackney Council the

Planning Policy and Strategy team, Strategic Projects, Regeneration, Housing and Development Control. Each team holds expertise, knowledge and experience of the issues and problems of implementing various aspects of the Local Development Framework from a strategic to site level. There is a risk that if communication between teams is lost at any stage in the process that the Core Strategy policies will not be delivered adequately, incurring significant adverse effects.

Information gaps

- 4.1.12 There is a lack of alignment between the SA objectives developed in 2005 and the Sustainable Community Strategy adopted in 2009. (The latest Community Strategy information was considered against each SA objective however. This is documented in the Updated Scoping Report, 2009).
- 4.1.13 An ecological survey is needed to clarify what habitats and species there are in the borough and to support the emerging Local Biodiversity Action Plan. This will allow the Proposed Submission Core Strategy Biodiversity Policy 28 to be delivered. The objectives of the current Sustainable Community Strategy 2008-2018 do not make specific reference to the protection of biodiversity in the Borough. An update of this is also recommended. There has been no confirmation that funding has been ring fenced for the Local Biodiversity Action Plan.
- 4.1.14 There is a lack of up to date evidence on the full potential the arts and cultural activities could play in regenerating Hackney's economy. Significant increases in these uses have been recorded in the South Shoreditch area. Further research is needed here to ensure opportunities are fully maximised to deliver Hackney's objectives for economic growth.
- 4.1.15 There is an absence of a detailed study which analyses our current social infrastructure and clarifies the predicted needs to accompany the planned growth over the next 15 years. This is required to achieve our objectives to reduce poverty and social exclusion.

5 Appraisal findings

5.1 Introduction

5.1.1 This Chapter sets out the findings from the appraisal of

- The Core Strategy objectives
- Proposed Submission Core Strategy Policies

The identification of significant effects is a requirement of the SEA Directive which states that:

“the likely significant effects of the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, architectural and archaeological heritage, landscape and the interrelationship between the above factors; to be included in the environment report.”

Annex 1(f)

5.1.2 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive.

The SEA Directive requires that:

“the measures envisaged to prevent, reduce and as fully as possible offset and significant adverse effects on the environment of implementing the plan or programme be included in the environmental report.”

Annex 1 (g)

5.1.3 Many of the measures proposed are in the form of general recommendations or points of consideration, rather than measures designed to counter specific impacts. The London Borough of Hackney will make responses to the recommendations prior to the submission of the Core Strategy to the Examination.

5.2 Appraisal of the Core Strategy objectives

The Proposed Submission Core Strategy objectives which have evolved following the preferred options consultation have been assessed against the SA Objectives.

CLG Sustainability Appraisal Guidance of Regional Spatial Strategies and Local Development Documents, 2005 states:

“It is important for objectives of the DPD to be in accordance with sustainability principles. The objectives should be tested for compatibility with the SA objectives.”

Section 3.3.4

Table 13: Sustainability Appraisal Objectives against the Core Strategy Objectives

Strategic Plan Objectives	Sustainability Objectives																			
	SA objective 1	SA objective 2	SA objective 3	SA objective 4	SA objective 5	SA objective 6	SA objective 7	SA objective 8	SA objective 9	SA objective 10	SA objective 11	SA objective 12	SA objective 13	SA objective 14	SA Objective 15	SA Objective 16	SA Objective 17	SA Objective 18	SA Objective 19	SA Objective 20
Inequality	Summary: Supporting equalities is an essential objective for Hackney. This is compatible against the SA objectives. However there are tensions or rather challenges in achieving these. Given the current conditions in Hackney. There is a need to provide a large range of supporting facilities to support education, health, affordable housing																			
Tackle inequality amongst Hackney residents and contribute to enhancing community cohesion across Hackney's neighbourhoods through raising the quality of development and by building on Hackney's distinctive strengths.	0	0	0	?	+	+	0	+	0	+	+	+	+	+	+	+	+	+	+	+
Housing	Summary: The objectives are generally compatible. It is however worth noting there are likely tensions between the growth anticipated and environmental limits. The impacts of intensification and development on brownfield sites for example will lead to some environmental impacts. Development must be sustainable, of high quality and sensitive.																			
Ensure that housing needs and aspirations of Hackney's residents and are met in a way that is sustainable.	-/?	?	?	-	0	+	-	0	-/?	+	-/?	+	+	+	+	+	?	+	-/?	-/?

Community Infrastructure	Summary: This is an integral part of Hackney's anticipated growth. With any increase in development albeit for important community infrastructure uses may incur impacts on the environment. As such sensitive development is essential.																			
Work in partnership with partners to deliver quality infrastructure that provides residents, workers and visitors with the essential services and facilities to enjoy Hackney and improve their quality of life.	-/?	?	?	?	-/?	+	-/?	+	0	+	+	+	+	+	+	+	?	0	+	+
Employment	Summary: There are possible conflicts been the objectives for economic growth, greater intensification of uses and the environmental objectives to protect and enhance the natural assets in the borough. There are objectives to reduce noise, air pollution and so on. Any economic growth will have to be sensitive to sustainability aspirations in the borough																			
Make Hackney one of London's most competitive and affordable business destinations by helping Shoreditch to continue attracting a distinctive mix of enterprises; Hackney Wick to improve the quality of its environment and industrial locations; and ensuring all employment area offer high quality, affordable units.	-/?	-/?	-/?	-	-/?	+	-	-/?	+	-/?	+	+	+	-/?	+	?	?	+	+	+
Town Centre Growth	Summary: The objectives are compatible generally however with any intensification of growth even in the most sustainable and appropriate locations may intensify impacts. Sustainable measures to support Town Centre aspirations are essential.																			
Develop Hackney's town centres into some of the most inclusive and vibrant places in London, by enabling, in particular, Hackney Central to become a civic and cultural quarter, Dalston to become a thriving, vibrant and well-connected centre with a strong cultural industries presence, and the Borough's street markets to remain an essential feature of their neighbourhoods.	-/?	-/?	-/?	-	-/?	+	-	-/?	+	-/?	+	+	+	+	+	?	?	+	+	+

Climate Change	Summary: The objectives for climate change and economic growth do raise some possible conflicts although the most sustainable options fro growth are sought. Focus on forming sustainable patterns of development as part of the growth agenda would further align these objectives.																			
Tackle climate change through higher standards in new buildings, retrofitting existing buildings and promoting local energy centres as a way of providing cheaper and cleaner energy. Reduce resource consumption through ensuring efficient use of water, sustainable waste management, promoting waste minimisation and recycling.	+	+	+	?	+	+	+	-/?	0	+	+	0	0	0	-/?	+	?	+	-/?	+
Health	Summary: The creation of essential infrastructure and more sustainable transport modal shifts is positive. There are no major conflicts identified. Any development may incur impacts and therefore flagship sustainable health centres for example would serve to mitigate against this.																			
Shape Hackney’s environment to promote healthy and active lifestyles by improving health facilities, encouraging a shift from car usage to public transport, walking and cycling, and providing a safer and more secure environment across the whole borough.	-/?	?	?	+	+	+	-/?	0	+	+	+	+	+	+	+	0	?	+	?	?
Natural Environment	Summary: There are no objective conflicts although the high aspirations for economic growth and intensification may generate some conflicts and pressures on delivering this successfully.																			
Ensure that Hackney’s natural environment, including wildlife habitats and landscape character is protected and conserved, and that new development identifies, protects and enhances important assets. Look for opportunities to create new wildlife habitats.	+	+	+	+	+	+	0	+	+	+	+	+	+	-/?	+	+	?	+	?	?

Historic Environment	Summary: There are no outright conflicts however preservation in general of historic character, specific buildings, are of archaeological priority and so forth reduces flexibility in changing the urban townscape and design. These restrictions may give rise to some tensions. There are innovative design solutions that are mutually supportive. Aspirations to achieve these would further reduce any likely conflicts.																			
Protect and enhance the quality of Hackney's historic environments through a sensitive approach to existing character.	-/?	-/?	+	+	+	-/?	?	+	+	+	+	+	+	-/?	?	+	?	+	?	?

5.3 Appraisal of the Growth options

- 5.1.4 Below summarises the appraisal assessment findings of the Proposed Submission Core Strategy, June 2009. Each policy was fully assessed against the baseline 'no plan scenario'. The summary includes a reference to how the Proposed Submission Core Strategy policies compare against the Preferred Options Core Strategy of April 2008.
- 5.1.5 Full details of each chapter assessment comparing the assessment findings of the Preferred Options April 2008, May 2009 and June 2009 stages are available in the appendices to this Report.

5.4 Delivering Growth

Core Strategy Policy 1: Growth Locations - Dalston

Summary

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 one and the overall changes to the Town Centres policy have also been subject to a separate appraisal.

The preferred options assessment did not uncover any potential significant adverse impacts. The collective policy position to promote Dalston as a major Centre with a retail and commercial emphasis scores well against the economic objectives as it supports the continued growth of this major centre although there are potential adverse effects if this is not delivered with an aligned position with the AAP. The policy scores has a generally neutral to positive effect on the social objectives as improving Dalston, accessibility to the centre, housing within the centre and high quality development. However, the increases in the population may also increase demands on the health and social services and facilities. Potential negative effects where this cannot be delivered. There are some potential negative environmental impacts as a result of the increase in densities, usage and vibrancy in the Town Centre on air quality, noise and biodiversity. There are potential negative impacts on the conservation areas due to the anticipated growth. There are positive effects on the open space due to the promotion of the eastern curve.

Difficulties encountered/assumptions made

Presumption that the CHP, retail clusters, library can be delivered by the 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.

Significant effects

There will be 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.

Potential effects regarding climate change mitigation and adaptation, if decentralised CHP/Biomass energy systems are not delivered.

Potential effects if the principle of 'retail clusters' (set out in the Dalston AAP) is not aligned with the economic objectives and promotion of a Major Centre.

Avoidance/mitigation

To further improve the performance of this policy by not reinforcing and supporting the development of CHP/Biomass which is being considered in the Town Centres and in the AAP.

In order to ensure measures are taken to combat as far as practicable the 60 ha open space deficiency, reference should be made to the policy position in relation to open space in the AAP and the designation of the Dalston curve should be outlined on the map.

Reference to the new library

Highlight Dalston as a Major Centre in the policy and align with the principle of 'retail clusters' with the Dalston AAP is recommended.

Cross reference to the important mitigating policies.

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 neighbourhood's chapter aims to secure adequate provision of social and health facilities.

Measures taken into account

Library, CHP/Biomass, Ridley Road market and the eastern curve not included in the final policies or justifying text.

Proposals for monitoring

Renewable Energy generation: Renewable energy generation (Core), CO₂ reduction from local Authority operations (National NI 185)

Access to education and skills in Dalston: Educational uses and demand (Contextual), Educational uses provision (Contextual)

Open space deficiency in Dalston: The total amount of open space and nature conservation sites that have been improved in areas of deficiency.

Core Strategy Policy 1: Growth Locations - Hackney Central

Summary

The Hackney Central Preferred Policy Option (PPO) 39 has been cut down. The PO SA identified generally positive or neutral effects, with one potential adverse impact on noise. This policy is dealt with within the town centre section of the Proposed Submission Core Strategy 1 Growth locations and in paragraph four of Core Strategy Policy 14 'Town Centres'.

The submission assessment identified that the policy will have a positive economic impact. There are potential negative impacts resulting from the increased amounts of growth upon the social and environmental objectives. The potential to meet targets to tackle worklessness in the borough may not be fully realised here without the clear aspiration for Hackney Central to grow into a major centre.

The policy focuses on civic functions. Although these are an important element of the character of the area, they do not have a strong commercial element. This could create potential negative effects, resulting from a lack of social infrastructure which supports growth.

Difficulties encountered/assumptions made

Hackney Central should be a primary focus of growth. Equally relevant are 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 must be achieved with the Hackney Central AAP.

This policy will be implemented along with the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability policies to deliver sustainable growth.

Significant effects

Potential negative effects in relation to the social and environmental effects resulting from the increase in growth in the area.

The renewable energy objectives may not be fully realised without reference to CHP.

Avoidance/mitigation

Development control policies to consider impacts on noise on a site-by-site basis.

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 this is the civic heart, the cultural and commercial growth potential may not be realised without the promotion of commercial and retail growth.

Reference to CHP

Measures taken into account

Reference to cultural development in Hackney Central

CHP is not specifically referred to.

Proposals for monitoring

Unemployment in Hackney: Unemployment (Contextual), Working age people on out of work benefits (National NI 152), Number of vacant commercial units (Local)

Air Quality and adapting to climate change: Per Capita reduction in CO2 emissions in the LA area (National NI 186), Adapting to climate change (National NI 188), and car free development

Health: People in good/poor health and with long term illness, Working age people on out of work benefits (National NI 152)

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

Summary

The Proposed Submission Core Strategy Policy has been refined to more clearly highlight the intensification of use around the new proposed East London Line Stations.

Preferred Policy Option 11 focused on optimising from the planned improvements to the East London Line and North London Line Networks. The policy wording changed. Core Strategy Policy 1 includes a section on the railway line improvements.

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.

Positive effects were predicted on transport objective 6 and air quality objectives. Positive results against SA objectives 19 and 20 in the support of economic growth. Positive performance against SA objective 15 promoting affordable housing. Potential effects of noise, air quality and waste by the further increases in industrial uses and compatibility issues where these may occur next to residential uses. Potential positive effects against objectives for culture. Potential adverse impacts against cultural heritage objective.

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 in being the best use to support the growing economy here in the future. 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.

Significant effects

Significant positive effects on transport objective 6. Also positive results against SA objectives 19 and 20 in the support of economic growth. Positive performance against SA objective 15 promoting affordable housing.

The area along the arches is a conservation area. Here there are potential negative effects on the ability of these areas to be well preserved, arising from the continuation of industrial uses. Also there would be the potential effects arising from the location of industry alongside commercial and residential uses. Potential effects on economic potential would not be realised due to the continued focus on industrial uses. This area presents a great opportunity for arts and cultural activity in Shoreditch, and Dalston. Railway arches are an ideal location for the development of arts and cultural activity.

Opportunities may not be realised as new stations are not indicated on the map.

Avoidance/mitigation

Clarity as a result of evidence on the need to protect industrial locations and the marriage with commercial, leisure and cultural uses. Clarity needed on the inset map to reflect the policy position and to outline it as an area of growth more clearly.

The new stations which are to be built by 2010 should appear 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 iterations stages from 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. This will also for other commercial sectors to move in the future if future evidence becomes available to support this.

Proposals for monitoring

Increases in accessibility: Access to services and facilities by public transport, walking and cycling (National NI 176)

The growth of commercial and cultural industries along the east London line Corridor: Total amount of floor space for 'town centre uses' (Core BD4), Employment land available – by type (Core BD3), Number of vacant commercial units (Local) Increase in employment floorspace in Industrial and Commercial Improvement Areas. (Local)

Protection of the Conservation Area along the corridor: Conservation Areas (Local)

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

Summary

The Preferred Option (PPO) 45 Woodberry Down did not identify any significant adverse effects however it did suggest potential negative effects in relation to 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.

These policies were assessed together. Additional evidence gathered at the Submission SA stage could not rule out potential negative effects on the air quality and adverse impacts on climate change.

Consultation was undertaken with the EA and Natural England highlighting these potential effects and measure were taken to further improve our Climate Change and Sustainability and Cleaner, Greener and Safer Chapters to counteract this. The policy is in a waterfront location and potential negative effects may be incurred if it is not designed and developed in accordance with our revised waterfronts policy. The policy had a generally positive social effect due to the additional community facilities anticipated however it was felt necessary to refer to these more strongly in the policy.

Potential negative effects on employment levels given the increased densities in the area. Links are very important with the Manor House area, which is anticipating an increased commercial element.

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.

Significant effects

No significant adverse effects. Potential effects on air quality and climate change if this policy is not integrated with the Cleaner, Greener and Safer, Climate Change and Environmental Sustainability policies to deliver sustainable growth. There needs to be a commitment to new transport infrastructure, such as new bus routes etc to support the development.

Potential effects on climate change if the CHP/Biomass is not delivered.

Potential economic effects by the increase in demand and lack of supply of jobs.

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.

Consultation was undertaken with the EA and Natural England highlighting these potential effects and measure were taken to further improve our Climate change and Sustainability and Cleaner, Greener and safer (including the waterfront development policy) Chapters to counteract this.

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 refer to Manor House for which production of an Area Action Plan is currently underway and due for public consultation in November 2009. Consultation was undertaken with the EA and Natural England on reducing environmental impacts has taken place.

Specific reference to CHP, new health centre and community facilities has not been added.

Reference to the transport connections of the Piccadilly Line Tube Station at Manor House has been included in the supporting text.

Proposals for monitoring

Employment in the Woodberry Down Area: Working age people on out of work benefits (National NI 152)

Air Quality and CO2 emissions in the Woodberry Down Area: Per Capita reduction in CO2 emissions in the LA area (National NI 186)

Air Quality and adapting to climate change: Per Capita reduction in CO2 emissions in the LA area (National NI 186), Adapting to climate change (National NI 188),

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

Summary

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 has been undertaken with the Environment Agency.

Potential significant adverse effects from inappropriate development in areas at risk of flooding were identified. In addition to this the policy had a neutral on the environment and environmental performance.

The new policy scored positively against the economic objectives as it is a designated employment areas which evidence suggest is the best use. It scored neutral to positive in regard to housing as additional dwellings will be put in place. However this is dependant on whether they are in appropriate locations.

Difficulties encountered/assumptions made

The regional policy position highlights the area as a Strategic Employment Location however the Olympic Legacy Development Framework seeks more of a housing focus. The London Borough of Hackney has both been able to access the evidence base that underpins the London Thames Gateway Corporation's position on housing growth in the Wick. This will be subject to further discussions through the Area Action Plan. Following the Strategic Flood Risk Assessment Level two discussions are being held with the Environment Agency on strategic solutions to manage the flood risk in the area. As above the solutions will form part of the Area Action Plan. The Environment Agency are content with the current strategic core Strategy policy on the Hackney Wick.

Significant effects

As summarised above, significant adverse effects would be incurred on social and environmental conditions if inappropriate development i.e. housing in flood risk zones 3 in particular was allowed. Flooding can cause damage to property, injuries and loss of human life. Hackney has significant vulnerable BME groups. It is important that a strong position is taken to ensure that the quality of life for all of 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. (see above)

Significant adverse effects may be incurred by the removal of the industrial employment locations there. The economic evidence base demonstrates that that these uses support the population in the area.

Avoidance/mitigation

Do not allocate housing or mixed use development which include an affordable housing component in the areas at risk of flooding. Maintain the strategic employment location.

The policy is in accordance with the above and provides a strategic position, however it will be important that this information is fed down to the SA of the Hackney Wick and Fish Island Masterplan.

Measures taken into account

The Hackney Wick Policy (Policy 5) has been changed to take account of the Environment Agency response. The revised policy includes specific reference to the potential significant adverse effects if inappropriate development is located in areas at medium to high risk of flooding.

The policy does not conflict with the above avoidance and mitigation measures. It provides a strategic position. Detailed policy options are currently under discussion and are being subject to separate appraisal on the balance of employment led or housing regeneration and the implications of the flooding issue.

Proposals for monitoring

Flood Risk: Number of planning permissions granted contrary to EA advice on flooding and water quality grounds. (E1), Contamination (Contextual), Use of SUDS in major developments (Local) & Flood Risk (contextual)

Employment in the Hackney Wick Area: Overall employment rate (National NI 153), Deprivation (Contextual), Quality of Life (Contextual)

Housing Growth in Hackney Wick: Affordable housing delivered (National N1 155) , Housing need (Contextual)

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

Summary

Preferred Policy Option (PPO) 44.set out the position for South Shoreditch. The Submission Policy 1 highlights the City Fringe - Shoreditch area as part of London's Central Activities Zone. This is later expanded in Core Strategy Policy 3.

Potential neutral to negative economic effects may arise from under-emphasising the potential of South Shoreditch as a suitable location for emerging industries.. Shoreditch is consistently referred to as a priority area for industrial employment and a local centre.

However, Shoreditch is one of Hackney's most significant and exciting areas of growth . Also, given the new and improved transport connections linking it to the city do we not see this growing into a major Town Centre over the next 15 years? To support future investment in the area, and give confidence in its development we should be clear about this in the spatial vision. Neutral to negative social and environment effects were identified against the SA objectives.

Difficulties encountered/assumptions made

The policy has not placed a strong emphasis on implementation of the future growth of South Shoreditch in relation to the City Fringe Opportunity Area Planning Framework and South Shoreditch SPD. There is a requirement for more research on the economic potential of cultural industries in South Shoreditch and along the East London Line corridor.

Significant effects

Potential neutral to negative economic effects may arise from under-emphasising the potential of South Shoreditch in creating growing industries such as arts, culture, office and commercial uses. A lot of the growth in Shoreditch is integrated with that of Islington, The City and Tower Hamlets. There would be potential negative effects if the various growth agendas are not integrated.

Negative to neutral effects on the environmental objectives given the growth anticipated.

Negative to neutral effects on the social SA objectives due to the potential additional anticipated needs as a result in the growth in the area.

Potential effects on views due to the tall building designation in the area of protected strategic views.

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.

There should be additional focus on the commercial and offices uses in South Shoreditch.

Links should be made to the City Fringe Opportunity Area Planning Framework and South Shoreditch SPD. Reference to the protection of strategic views should also appear.

Proposals for monitoring

Employment in Shoreditch: Unemployment (Contextual), Employment Projections (Contextual), Overall employment rate (National NI 153),

Improvements to Deprivation and quality of life in Shoreditch: Deprivation (Contextual), Quality of Life (Contextual)

Core Strategy Policy 6: Transport & Policy 7: Locating Infrastructure

Summary

The Preferred Policy Options (PPO's) 29, 30 and 31 on transport have been revised by the above policies and Submission Core Strategy 33 'Promoting Sustainable Transport' which has been appraised separately. The assessment findings resulted in a neutral to positive performance against social objectives, neutral to positive performance against economic objectives. It also uncovered a positive performance against the transport objectives, with neutral to positive performance against environmental objectives.

Difficulties encountered/assumptions made

The details of what is the minimum supporting transport requirement i.e. new bus networks to accompany new development, does not appear. The principle of building developments in accessible locations is found but the evidence to back this up for 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.

Significant effects

The policy strengthens the strategic position to encourage patterns and forms of development that reduce the need for car based travel. There are areas where accessibility by non-car modes is poor. Potential negative effects were identified from not focusing investment in such areas which also fall outside the areas of growth. .

Neutral to positive performance against economic topic areas and objectives. There is a positive performance against the transport objective. There would be a neutral to positive performance against environmental objectives if the policy was managed effectively.

The Habitats Regulations Assessment noted possible in combination effects of air pollutants generated by increased use of the private car. It noted that the A503 (Forest Road) passes through the Special Protection Area, separating the two components of Walthamstow Reservoirs SSSI and can expect to receive higher volumes of traffic as a result of the 10,850 new homes within Hackney. It highlighted that increasing nitrogen deposition due to increased road traffic 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 far as possible, mitigating this potential effect.

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 on 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.”

Avoidance/Mitigation

Reference to Crossrail even though it is in the early stages. 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 and their appropriate mechanisms where current levels are poor. Include a section on design against crime initiatives around public transport bus stops, train stations etc. 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 aims to set out the PTAL scores more clearly. More emphasis is placed on the reducing the use of the private car. More emphasis has been added to improve general access requirements.

Proposals for monitoring

Improvements to access: Public Transport provisions/accessibility/use (Contextual), Walking/cycling levels (Contextual), Car-free housing schemes (Contextual), Working age people with access to employment by public transport and other specified modes. (National NI 176)

Reduction of the use of the private car: Traffic/congestion levels (Contextual), Local bus passenger journeys originating in authority area. (National NI 177), Planning consents completed for major

travel generating schemes in accessible locations(Local), Car free and car capped housing (Local, Access to services and facilities by public transport, walking and cycling (National NI 176), Working age people with access to employment by public transport and other specified modes. (National NI 176)

5.5 Supporting Neighbourhoods and Communities

Core Strategy Policy 8: Focusing Social Investment

Summary

This policy expands on preferred Options Policy 22. The presumption is that this policy should apply within areas of growth. However that was not the policy position chosen at the issues and options stage. That position stated that provision should be focused on areas most in need which is not necessarily the same thing.

The policy scored significantly positively against social objectives on the type of infrastructure that should be delivered. However concerns about the lack of information about where the areas of most need are.

The policies fared neutral against the SA environmental objectives. There is a presumption new developments will be of a high standard of sustainable design.

The policy scored positively against economic objectives. Provision of education facilities, having a healthy population all contribute positively to the local economy.

Difficulties encountered/assumptions made

Concerns about the lack of knowledge of the additional infrastructure required to accompany the growth. There is a vagueness on the delivery mechanisms and on how the broad aspirations may be implemented. Through discussions it has been suggested that the delivery of successful S106 has not been effective with only one health facility ever being created. The reasons for this should also be uncovered and addressed where possible here.

Concern about the presumption that new infrastructure will be located in the areas of growth.

Given that the AAPs for most of the key growth areas are at their advanced stages now for Dalston, Hackney Central, Hackney Wick and the Woodberry Down Outline Application Masterplan we should check how this issue is covered and address if there are gaps and provide additional support where provision is being identified as proposed facilities on the proposals map. We should also check the Shoreditch SPD 2006 and if there are gaps in community facility provision or it is not covered properly we should make a point of superseding its policy.

Significant effects

The current key diagram 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 key priorities for social infrastructure and the information does not appear to be accurate or thorough. Sport halls are generally outside the areas of growth (excluding Woodberry Down) and estate renewal locations. The diagram does not demonstrate a consideration for the increased 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 here to address this.

The Key diagram does not address areas of health and education facilities, which is a key priority in the borough.

The mechanisms outside planning resulting from national funding should be clearly laid out and the implications of the Community Infrastructure Levy should this come into effect. Where possible, our policies should be checked to see if they can also be successfully implemented under the new legislation.

Significant adverse effects on social objectives if the policy is not implemented. Through discussions it has been suggested that the successful delivery of S106 has not been effective.

The performance is not significantly positive either against social objectives, due to the lack of detail of the priority locations and a general estimate of how facilities may be required.

Positive effects against economic objectives, if the policy is delivered effectively.

Neutral environmental effects if this policy is delivered alongside the environmental policies.

Avoidance/mitigation

Demonstrate by reference to areas why the focus should only be in areas of growth. The updated SA Scoping report does not have the evidence for this and is of 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 the 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 be clearly laid out and the implications of the Community Infrastructure Levy should this 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 key diagram 4 in the Preferred Option report 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.

Proposals for monitoring

Improvements of decline in the health of residents in Hackney:: People in good/poor health and with long term illness, Working age people on out of work benefits (National NI 152) People in good/poor health and with long term illness,

Education and skills in Hackney: Skills gaps in current workforce reported by employers. (National NI 174), Working age people on out of work benefits (National NI 152)

Levels of deprivation in Hackney: Deprivation (Contextual) Quality of life (Contextual)

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

Overview

This policy expands on preferred options policy PPO22. The policy scored positively against SA social objectives 13 for education. However there are concerns about the extent and level of new infrastructure required.

The policies faired neutral against the SA environmental objectives. There is a presumption that new developments will be of a high standard of sustainable design. The policy scored positively against economic objectives. Provision of education facilities contributes positively to the local economy.

Difficulties encountered/assumptions made

We should determine where areas of deficiency are located in Hackney, with the objective to increase local education performance to the London wide and national average standards.

Significant effects

There were no significant adverse effects from this policy. The performance was positive against social objectives and objective 13 in particular. Performance was hampered by the lack of detail of the locations of priority and a general estimate of how facilities may be required. Positive effects against economic objectives if the policy is delivered effectively.

Neutral to negative environmental effects if delivered alongside the environmental policies and facilities are located in accessible locations. Through discussions it has been suggested that the delivery of successful S106 has not been effective with only one health facility ever being created. The reasons for this should also be uncovered and addressed where possible here.

Avoidance/mitigation

Illustrate that facilities will seek to achieve London and national levels 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 S106 and steps to best use this mechanism in the future in implementation plan.

Measure taken into account

Reference to finding streams, AAPs and principles of the policies application strengthened.

Proposals for monitoring

Skills gaps in current workforce reported by employers. (National NI 174), Educational Uses-demand (Contextual) & Educational uses-provision (Contextual)

Core Strategy Policy 10: Health Investment and Infrastructure & Policy 12: Health and Environment

Overview

This policy expands on preferred options policy PPO22. It is considered that possible effects were identified on biodiversity, however this is being mitigated by the new policy on Biodiversity in the Cleaner, Greener and Safer chapter. The policy scored positively against SA social objectives 12 for health. However concerns about the level and extent of infrastructure remain.

The policies fared neutral against the SA environmental objectives. There is a presumption that new developments will be of a high standard of sustainable design. The policy scored positively against economic objectives. Having a healthy population contributes positively to the local economy.

Difficulties encountered/assumptions made

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

Significant effects

There were no significant adverse effects of this policy. The performance was positive against social objectives SA objective 12 in particular. Performance was hampered by the lack of detail of the locations of priority and a general estimate of how May facilities May be required.

Positive effects against economic objectives if delivered effectively.

Neutral to negative environmental effects if delivered alongside the environmental policies and facilities are located in accessible locations.

Through discussions it has been suggested that the delivery of successful S106 has not been effective with only one health facility ever being created. The reasons for this should also be uncovered and addressed where possible here.

Avoidance/mitigation

Illustrate more that facilities will seek achieve London and national levels 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 S106 and steps to best use this mechanism in the future in implementation plan.

Measure taken into account

Reference to finding streams, AAPs and principles of the policies application strengthened.

Proposals for monitoring

People in good/poor health and with long term illness, Healthy Life Expectancy at 65 (National NI 137) & All age all cause Mortality rate (National NI 120)

5.6 A Dynamic and Creative Economy

Core Strategy Policy 13: Town Centres

Summary

Policy 14 – 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. It scored well against social (employment and skills related) and economic sustainability objectives. Its impact on environmental objectives is more mixed because of the potential for economic growth to lead to more energy consumption and possible increase of pollution from car use.

Difficulties encountered/assumptions made

Not clear why Stoke Newington and Finsbury Park are not highlighted as principle growth areas along with Hackney Central.

The employment policy presumes that appropriate commercial and industrial development is clear however this would vary significantly depending on the location of the site as these are strongly linking to the growth areas identified at regional and sub-regional level. Some areas may be of higher land value and some areas could be in areas of high risk of flooding etc.

Likely significant effects

Further intensification of brownfield sites and intensification of development is likely to incur some environmental impacts.

Avoidance/mitigation

Ensure the local people and business will benefit from the economic development; the Council should work in partnership with the other organisations for example, education and training voluntary organisations to provide people opportunity to gain relevant skills to meet job requirements. The chapter of Supporting Neighbourhoods and Communities will assist implementation of policies on provision of infrastructures to support local communities.

Measures taken into account

Additions to the Cleaner, Greener and Safer chapter to further emphasis the importance of open space provision. Additions to the Climate Change and Environmental Sustainability Chapter to further promote sustainable design and construction.

Proposals for monitoring

Unemployment (Contextual), Employment uses/supply (Contextual)

Employment Projections (Contextual), Overall employment rate (National NI 153), Working age people on out of work benefits (National NI 152), Total amount of floor space for 'town centre uses' (Core BD4), Employment land available – by type (Core BD3), Working age people on out of work benefits (National NI 152), Number of vacant commercial units (Local). Increase in employment floorspace in Industrial and Commercial Improvement Areas. (Local)

Core Strategy Policy 14: Street Markets

Summary

Policy 14 – Street Markets replaces and expands on Preferred Policy Option 27 (PPO27) PPO27 didn't have any adverse impacts on social, environmental and economic objectives. This expanded policy strengthens the focus on protection and improvement to the physical, social and economic conditions of the existing street markets. This policy is supportive of promoting local economic prosperity. In terms of social objectives, the policy is positive to help create more local jobs and services to reduce social inequality in particular for people living in the most affected areas and ethnic minority groups who require a wide range of choices on food and other services.

Difficulties encountered/assumptions made

Both retail and employment policies presume that the growth and employment sites will be located in areas where there is high public transport accessibility. Nevertheless this would depend on delivery of infrastructure in the right place, and the right timing. As a result of this, the potential risk of delay of infrastructure delivery will cause a huge adverse impact on all communities in Hackney.

Significant effects

For employment sites, potential adverse effects may be generated if the employment site is situated in inappropriate locations such as in or near designated sites of important for nature conservation, protected open land, flood risk zones, areas of archaeological priority and conservation areas.

There could be significant effects to the urban environment if the streets are not sufficiently cleaner and managed. Potential effects of noise pollution if markets are not sufficiently managed.

Avoidance/mitigation

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

Measures taken into account

Measure to be followed through development management DPD.

Proposals for monitoring

Unemployment (Contextual), Employment uses/supply (Contextual)

Employment Projections (Contextual), Overall employment rate (National NI 153), Working age people on out of work benefits (National NI 152), Total amount of floor space for 'town centre uses' (Core BD4), Employment land available – by type (Core BD3)

Core Strategy Policy 15: Night-Time Economy

Summary

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 pollution on the adjoining neighbourhood's amenity.

Difficulties encountered/assumptions made

Both retail and employment policies presume that the growth and employment sites will be located in areas where there is high public transport accessibility. Nevertheless this would depend on delivery of infrastructure in the right place and the right timing. As a result of this, the potential risk of delay of infrastructure delivery will cause a huge adverse impact on all communities in Hackney.

Likely Significant effects

Community 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"

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.

Proposals for monitoring

Employment Projections (Contextual), Overall employment rate (National NI 153), Working age people on out of work benefits (National NI 152), Total amount of floor space for 'town centre uses' (Core BD4), Employment land available – by type (Core BD3), Working age people on out of work benefits (National NI 152), Number of vacant commercial units (Local). Increase in employment floorspace in Industrial and Commercial Improvement Areas. (Local)

Core Strategy Policy 16: Employment Opportunities, Policy 17: Economic Development & Policy 18: Promoting Employment Land

Summary

Policy 16 17 and 18 – Employment Opportunities (New), Economic Development and Promoting Employment Land. These policies score well against social, and economic sustainability objectives in terms of addressing the issue of worklessness through provision of training opportunities for local people. This action will not only promote economic prosperity by reducing the level of unemployment but also reduce social inequalities across the borough.

Difficulties encountered/assumptions made

The employment policy presumes that appropriate commercial and industrial development is clear, however this would vary significantly depending on the location of the sites as there are strongly linking to the growth areas identified at regional and sub-regional level. Some areas may be of higher land value and other areas may be in areas of high risk of flooding etc.

Likely Significant effects

For employment sites, potential adverse effects however may be generated if an employment site is situated in inappropriate locations such as in or near designated sites of important for nature conservation, protected open land, flood risk zones, areas of archaeological priority and conservation areas.

Avoidance/mitigation

Implementation of sustainable design of any commercial and industrial development to ensure no adverse impact on the environment. Avoid allocating any employment site in or close to an inappropriate location; in the case of flood risk zones, detailed sequential tests should be undertaken to mitigate the adverse impact of flood risk. Ensure the local people and businesses will benefit from the economic development. The council should work in partnership with the other organisations for example, education and training voluntary organisations to provide people opportunity to gain relevant skills to meet job requirements. The Supporting Neighbourhoods and Communities chapter will assist implementation of policies on provision of infrastructure to support local communities.

Measures taken into account

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.

Proposals for monitoring

Employment Projections (Contextual), Overall employment rate (National NI 153), Working age people on out of work benefits (National NI 152), Total amount of floor space for 'town centre uses' (Core BD4), Employment land available – by type (Core BD3), Number of vacant commercial units (Local). Increase in employment floorspace in Industrial and Commercial Improvement Areas. (Local)

5.7 Providing Better Homes

Core Strategy Policy 19: Housing Growth

Summary

Policy 19: Housing Growth replaces and expands on the Preferred Policy Option 17 and 19 (PPO17 and PPO19)

PPO17 and PPO19 didn't identify adverse negative impacts on social, economic and environmental objectives.

This policy scores well against the majority of the SA/SEA topics and the objectives except the environmental area. New residential development may have some potentially negative impacts on climate, soil and water and transport. The policy needs to be applied in conjunction with Strategic Policy in Delivery Growth and Climate and Environmental Sustainability and also be in line with the North London Joint Waste Plan.

Difficulties Encountered/ assumptions made

The policy presumes that appropriate residential development within the borough is clear, however this would vary significantly depending on the location as these sites must strongly link to the growth areas identified at regional and sub-regional level. Some areas may be of higher land value and other areas may be in areas of high risk of flooding etc.

Likely significant adverse effects

Population predictions and policies for housing and housing densities in line with national and regional guidance will increase pressures on Hackney's social, economic and transport infrastructure. This, potentially could lead to increases in poverty, deprivation, poor health, waste generation and worklessness.

Avoidance/ Mitigation

More emphasis on initiatives such as living walls, green roofs, bat boxes and bird boxes to mitigate against environmental effects. Work with infrastructure providers to ensure water supply and energy provision is planned ahead of development (Policy 7) and that rates of construction do not exceed the provision of new infrastructure where necessary.

Measures taken into account

It is important that social indicators, economic and transport indicators are closely monitored.

Proposals for monitoring

Affordable homes delivered (National NI 155) Number of households living in temporary accommodation (National NI 156) Supply of ready to develop housing sites (National NI 158) Housing needs (Contextual) Housing capacity (Contextual)

Core Strategy Policy 20: Affordable Housing

Summary

Policy 20: Affordable Housing replaces and expanded on the Preferred Policy Option 18 (PPO18) PPO18 did not identify any adverse negative impacts on social, economic and environmental objectives. This policy is supportive of the delivery of affordable housing.

In terms of social objectives, the policy identifies positive aspects which may help to reduce inequality - in particular to provide more decent, affordable homes which is one of the key indicators of deprivation.

Nevertheless, the growing economy and population could result in negative environmental impacts through increasing development pressure, leading to greater energy consumption and production of more waste and pollutants. These matters would need to be addressed in the detailed design of new housing. The policy needs to be applied in conjunction with policies in Delivering Sustainable Growth and Climate Change and Environmental Sustainability chapters and also be in-line with the North London Waste Plan.

Difficulties Encountered/ assumptions made

The policy presumes that appropriate residential development within the borough is clear however this would vary significantly depending on the location as there are strongly linking to the growth areas identified at regional and sub-regional level. Some areas may of higher land value and some areas may be in areas of high risk of flooding etc.

Likely significant effects

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.

The EqIA, 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."

Avoidance/mitigation

The supporting text should include a section on viability, and consider the challenges in the delivery of 50% affordable housing on sites.

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 needed however to further support this.

Proposals for monitoring

Affordable homes delivered (National NI 155) Number of households living in temporary accommodation (National NI 156) Supply of ready to develop housing sites (National NI 158) Housing need (Contextual) Housing capacity (Contextual) Household size and composition (Contextual)

Core Strategy Policy 21: Supporting Housing Requirements

Summary

Policy 21: Supported Housing Requirements replaces and expands on the Preferred Policy Option 21 (PPO21) PPO21 didn't have adverse negative impacts on social, economic and environmental objectives. This policy is very supportive to help reduce social inequality, in particular for the most vulnerable groups in the borough. It scores well against social objectives.

Difficulties Encountered/ assumptions made

The policy presumes that appropriate residential development within the borough is clear however this would vary significantly depending on the location as there are strongly linking to the growth areas identified at regional and sub-regional level. Some areas may of higher land value and some areas may be in areas of high risk of flooding etc.

Likely significant effects

Potential effects on areas of archaeological priority where designated areas overlap with estate renewal projects. Possible impacts especially on the lower income and BME groups on access to housing and family accommodation. Potential environmental effects resulting from the provision of large amounts of new housing.

The EqIA, 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."

Avoidance/Mitigation

More emphasis on delivering the appropriate tenure mix should be included.

Measure taken into account

Measures have been taken to ensure that tenure mix is meeting on a site by site basis.

Proposals for monitoring

Affordable homes delivered (National NI 155) Number of households living in temporary accommodation (National NI 156) Supply of ready to develop housing sites (National NI 158) Housing need (Contextual) Housing capacity (Contextual) Household size and composition (Contextual)

Core Strategy Policy 22: Housing Density

Summary

Policy 22: Housing Density (New) This policy scores well against all environmental, social and economic sustainable objectives. The policy needs to be applied in conjunction with Strategic Policy in Delivery Growth and Climate and Environmental Sustainability.

Difficulties Encountered/ assumptions made

The policy presumes that appropriate residential development within the borough is clear however this would vary significantly depending on the location as there are strongly linking to the growth areas identified at regional and sub-regional level. Some areas may of higher land value and some areas may be in areas of high risk of flooding etc.

Likely significant effects

Potential effects on poverty, deprivation, poor health, waste generation and worklessness.

The EqIA, 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."

Avoidance/mitigation

Changes to increase emphasis on social infrastructure provision.

Measures taken into account

Measures have been taken to ensure that social infrastructure in included in the development of new schemes especially where densities are higher which will lead to increasing demands.

Proposals for monitoring

Affordable homes delivered (National NI 155) Number of households living in temporary accommodation (National NI 156) Supply of ready to develop housing sites (National NI 158) Housing need (Contextual) Housing capacity (Contextual) Household size and composition (Contextual)

Core Strategy Policy 23: Provisions for Gypsy and Travellers

Summary

Policy 23: Provision for Gypsies and Travellers replaces and expanded on the Preferred Policy Option 21 (PPO21) PPO21 didn't have adverse negative impacts on social, economic and environmental objectives. The policy is supportive to deliver identified needs for gypsies and travellers. The policy is very neutral in terms of having an unacceptable impact on social and environmental sustainable objectives. It doesn't have a strong link with economic sustainable objectives.

Difficulties Encountered/ assumptions made

The policy presumes that appropriate residential development within the borough is clear however this would vary significantly depending on the location as there are strongly linking to the growth areas identified at regional and sub-regional level. Some areas may of higher land value and some areas may be in areas of high risk of flooding etc.

Likely significant effects

The further decline of the quality of life of the Gypsy and Traveller families who already in national standards have one of the lowers recorded living standards than any other ethnic minority group.

Avoidance/Mitigation

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

This should be included as part of the site allocation DPD.

Proposals for monitoring

Affordable homes delivered (National NI 155) Number of households living in temporary accommodation (National NI 156) Supply of ready to develop housing sites (National NI 158) Housing need (Contextual) Housing capacity (Contextual) Household size and composition (Contextual)

5.8 A Safer, Cleaner and Greener Place

Core Strategy Policy 24: Design

Summary

Policy 24: Design replaces and expands on the Preferred Policy Option 13, 28 and 32

The policy scored neutral to positive against the social objectives as increasing the quality of development and design May generally make it are more pleasant place to live. The policy scored very positively against the SEA environmental topic areas and objectives. The policy had a neutral

to positive impact on the economic objectives as improvement the quality of the environment through high standards of design May make Hackney a more attractive place to invest.

Difficulties encountered / assessment made

The performance of this policy relies on alignment with Local Development Framework. No current reference to the Sustainable Standards for the Built Environmental SPD mentioned in the policy in the current Local Development Scheme.

This should be addressed in the implementation chapter

Significant effects

There have been no significant adverse effects identified. This policy sets out to offset the adverse impacts predicted resulting from the estimated population increases and growth in Hackney. It focuses on ensure waste recycling facilities, the better use of land, the protection of the urban fabric including the historic character. There are potential significant positive effects as a result of improving design performance, waste management, Reducing Green House gas emissions and the use of brownfield land in particular.

Avoidance/mitigation

Alignment with the LDF as a whole to ensure the policy is implemented correctly.

Measures taken into account in Cabinet Version May 2009

Revisions to the policy section 8.14 links the policy to the Development management DPD, the AAP's, design codes, emerging SPDs.

Proposals for monitoring

Number of demolitions in conservation areas (Local). Residual household waste per head. (National), Household waste recycled or composted (National). Capacity of new waste management facilities by waste planning authority (Core), Amount of municipal waste arising, and managed by management type by waste planning authority (Core).

Renewable energy generation (Core) E3, Access to services and facilities by public transport, walking or cycling (National NI 175) CO2 reduction from Local Authority operations (National NI 186) , Air quality (contextual)

Core Strategy Policy 25: Historic Environment

Summary

This policy improves on the performance of the preferred options policy PPO14 which it replaces.

This policy has a neutral to negative effect against some environmental objectives as the listed building regulations and conservation areas May restrict retrofitting existing buildings with high standards of sustainable design and construction techniques, greening initiatives such as green grooves and green walls. This policy has a neutral to positive effect on the economy as preserving Hackney's historic character helps to maintain its local distinctiveness and May make it a better

place to invest and work. This policy performs neutral against social objectives for the same reasons.

Difficulties encountered/assumptions made

It is difficult to quantify what is meant by '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 an 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.

Significant effects

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 and associated growth to meet these needs.

No significant adverse effects were identified. However there may be tensions between this policy and implementing the sustainable design and construction policies. Historic squares are referred to in an appendix and the supporting text. These are protected under legislation. The policy may be improved by their inclusion.

Potential effects on zones of archaeological remains where proposed estate renewal areas overlap. Although no quantified at this stage explanation of this is required in the supporting text if this occurs as this appears to undermine the policy. Historic squares are offered protection under legislation but not mentioned in the policy. This may inhibit their protection.

Avoidance/Mitigation

Clarity on the position of estate renewal that may 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 in a appendix and the supporting text and subject to their own legislation. 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 areas.

Areas of archaeological priority to be moved from map 7 to map 2 and to include protected squares.

Measures taken into account

None of the above

Proposals for monitoring

Conservation Areas (Local), Number of demolitions in conservation areas (Local), Numbers of buildings at risk on the English Heritage Register (Local) and Number of applications granted in Areas of Archaeological Priority Areas, where archaeological investigation was required. (Local).

Core Strategy Policy 26: Open Space Network

Summary

This policy replaces preferred options Policy PPO33. It changes the position of a 'no net loss policy'. 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.

Difficulties/assumptions made

There is the presumption that the open space deficiency figures reflect the current need however these are from the 2006 Borough Profile and do not anticipate the need following the predicted population increases. The increase in densities will increase demands on the amount of open space available. 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 the development would not have an adverse impact in this.

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 deficiency such as the.

Significant effects

No significant adverse impacts were identified. However there are areas in Hackney of open space deficiency particularly. Dalston. Potential adverse effects where open space deficiency is increased due to developments. It is important that developments do not increase open space deficiency, as even if an existing open space is not used for amenity it has the potential to do so in the future. However one the site has been developed the opportunities to address open space amenity are removed.

Potential adverse effect in the inability to protect green chains/green corridors as they are not clearly illustrated on the map. New open spaces proposed such as Dalston Curve are not highlighted on the map. These should be highlighted here.

The Habitats regulations Assessment set out that due to the 10,850 homes to be delivered in Hackney in combination with the 22,700 houses to be delivered within those other districts/boroughs that surround the SAC³⁹ 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. Policy 27 (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.”

Avoidance/ mitigation

Ensure that developments do not increase current and future predicted open space deficiency levels. And the replacement quality open space is provided 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.

Measures taken into account

Supporting text to note that developments do not increase current and future predicted open space deficiency levels, and the replacement quality open space is provided 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.

Proposals for Monitoring

The total amount of open space and nature conservation sites that have been created or improved in areas of deficiency, Total amount of existing playing fields and outdoor recreational spaces, including gains and losses through the planning system in the borough. Change in open space.

Core Strategy Policy 27: Biodiversity

Summary

This policy expands on Preferred Options 33. It improves performance as it places more focus on Biodiversity by the creation of a new policy. However the policy does not clarify the habitats and species of regional and national importance, the weight for their protection and suggests they May be subject to ‘appropriate development’ however this is vague and could cause regionally important habitats and species to be lost which is contrary to PPS 9.

Difficulties encountered/assumptions made

These principles are not currently reflected in the Draft Area Action Plans. The implementation chapter should identify that these principles 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 document's preparation is not yet set out. There are 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 national, regional and local level. This will be resolved at a site level. It is also unclear as to what is classified as 'an appropriate development' in a Site of Importance for Nature Conservation (SINC). The presumption is to protect these sites from development.

Significant effects

There are positive effects resulting from the inclusion of a policy on biodiversity. But overall there are potential significant adverse effects. In Hackney there are nationally rare species 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 stated above may inhibit their protection.

The distinction between regional and local value of biodiversity in relation to the SINC's 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.

Given that the policy does not identify where these sites are, or allocate strong protection of them there is a high risk that these sites could be developed, returning again to the question of 'What is an appropriate development in a SINC? .

There are lost opportunities to highlight greening development initiatives such as green roofs, green walls, SUDS etc.

Avoidance/mitigation

Clarify in the mapping the distinction between the SINC's. Note any species in the borough of national and regional importance and where these have been found i.e. Black Poplar. Clarify that development will not be permitted in areas of importance for Nature Conservation, at least at a regional level to comply with PPS 9. Include reference to greening design initiatives.

Measures taken into account

The policy has been revised to protect Biodiversity.

Proposals for monitoring

Change in priority habitats and species in the biodiversity action plan (local) Improved local biodiversity – active management of local sites (national) Change in areas of biodiversity importance (Core) NI 197

Core Strategy Policy 28: Water and Waterways

Summary

Replaces and expands on Preferred Policy Option 33. The old preferred options policy did not identify adverse impacts. Policy 28 further improves environmental and social performance in emphasising the importance of access and protection of the nature in these locations.

Although this policy strongly supports the protection of biodiversity as part of waterfront development, it is still promoting the development along the waterways. There is a lack of clarity of what inset map 7 means. It appears to be supporting development within a wide area along all of the waterways in the borough.

Difficulties encountered/assumptions made

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

Significant effects

Significant adverse effects could be generated if development is permitted in accordance with the current inset map 7 in designated SINC's or other protected open land, flood risk zones, areas of archaeological priority, and conservation areas. There could be potential negative effects if employment or housing were permitted in inappropriate locations along our waterfronts i.e. in Hackney Wick Flood Risk Zone 3a, or in Woodberry Down where industrial employment may not be in keeping with the aspirations for the sustainable new community there.

Avoidance/mitigation

Removal of 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 cover the different types of development that would be appropriate along the waterfronts.

Proposals for monitoring

Contamination (Contextual), Number of planning permissions granted contrary to EA advice on flooding and water quality grounds. (E1) Change in open space.

5.9 Climate Change and Environmental Sustainability

Core Strategy Policy 29: Resource Efficiency and Reducing Carbon Dioxide Emissions & Policy 30: Low Carbon Energy, Renewable Technologies and District Heating

Summary

Policy 29 replaces Preferred Options policies 34, 15 and 20. Policy 30 replaces elements of the preferred options policy PPO 15. The Climate Change and Environmental Sustainability is a new chapter providing substantially more detail around environmental issues and future challenges than at previous stages of the Core Strategy process.

Difficulties encountered/assumptions made

The main challenges in this section are the constraints to implementing renewable and low carbon technology, and estate renewal which meets the highest standards of sustainable design and construction including being carbon neutral. Are there a certain amount of houses in the development or redevelopment that would trigger this? Will it apply to estate renewal or just developments? Even though there may be private areas, or street appliances close to council buildings?

This expands and strengthens the elements to support reducing CO₂. If this policy is not implemented there is a high risk of the anticipated growth generating pollution far beyond recommended levels – and most of Hackney is currently in an air quality management area.

This expands and strengthens the elements to support reducing CO₂. If this policy is not implemented there is a high risk of the anticipated growth generating pollution far beyond recommended levels – and most of Hackney is currently in an air quality management area.

It is thought environmental improvements will make Hackney a better place to live and work, however issues around the viability of schemes given pressures for 50% affordable housing must be considered. In addition the policy also relates to ALL developments not developments above a certain threshold.

Significant effects

The Habitats Regulations Assessment (HRA) 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 (against the Code for Sustainable Homes) '*...minimum ratings of Level 3 from 2010, Level 4 from 2013 and Level 6 from 2016*'.

As a result the HRA sets out on page 30 that “It is therefore possible to conclude that the development 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.

There would be potential negative significant effects on air quality should this policy not be implemented, creating air quality way below the minimum acceptable levels. This would also impede performance against the health objectives.

Reductions in CO2 and other pollutants will reduce the likely impacts arising from growth on Biodiversity.

Potential effects of retrofitting in conservation areas and there may be some conflicts here with listed buildings.

Significant positive performance against the SA climate objectives, and air quality. Performance hampered due to the lack of the clear position of CHP in ALL of the growth areas.

Neutral to positive economic effects as these changes are likely to make Hackney a more attractive place to invest. Neutral to positive social impacts.

Avoidance/mitigation

Include text on the importance of sensitivity to design in conservation areas.

Measures taken into account

Reference to CHP in the other main growth areas but not the estate renewal projects.

Minor editing change and changes to policy titles.

Proposals for monitoring

Increases in renewable energy in Hackney: Renewable energy generation (Core) E3, CO2 reduction from local Authority operations (National) N1 185 Air quality (contextual)

Core Strategy Policy 31: Flooding

Summary

The policy scored neutral to positive against SEA/SA topic areas i.e. biodiversity where SUDs can support biodiversity.

Potential significant adverse effects against poverty and social, health, equalities, crime and safety and housing SA objectives if inappropriate development (particularly housing) is located in flood risk zone 3 despite the findings of the sequential test. Policy had neutral effects on economic performance

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

Neutral effects against the biodiversity objectives. Strengthening of the requirements for SUDS and green/brown roofs and the use of permeable surfacing would further support biodiversity. What scale of development would trigger the use of SUDS in schemes. Is this viable for all developments, development over 10 dwellings and/or larger schemes?

Potential significant adverse effects against poverty and social, health, equalities, crime and 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, appropriate measures should be in place to ensure that existing housing in flood risk zones have appropriate emergency planning measures.

Policy had neutral effects on economic performance. This would be improved if more appropriate uses such as employment were designated in Flood Zone 3.

Avoidance/Mitigation

Do not place housing in Flood Zone 3, even if development would be acceptable following the findings of the sequential or exception test. Policy changes suggested by the SFRA should be taken into account in the policy and supporting text.

Include a position on Pluvial flooding in Hackney requiring major applications to be consulted upon by the emergency planning team.

Measures taken into account

Although the policy does restrict inappropriate development, a policy position in Hackney Wick has not yet been agreed in respect to housing in the area.

No reference to emergency planning in the policy, or other changes to address the above.

Proposal for Monitoring

Number of planning permissions granted contrary to EA advice on flooding and water quality grounds. (E1), Use of SUDS in major developments (Local), Flood Risk (contextual)

Core Strategy Policy 32: Waste

Summary

Replaces PPO35. It is noted that we will need to consider the findings in the NLWP SA and these updates are ongoing. The policy which was assessed in the preferred options SA is significantly different to the actual PO policy 35. The policy assessed however at the preferred options stage refers to new major waste transfer facilities in the borough which is incorrect.

The policy has had a neutral to positive effect on SA environmental objectives. Better management of waste may reduce the adverse impacts from poor waste management and associated pollution.

Neutral to negative effects for the soil, water and noise SA/SEA topic area – both 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.

The policy scored positively to significantly positive against SA objective 18 on sustainable waste management. Further alignment with the NLWP would improve performance.

The policy had a largely neutral effect upon the social SA objectives however there were some positive elements identified through increase understanding and awareness of waste, increasing recycling and managing waste efficiently.

There was a neutral to positive effect on employment. Waste and industrial employment uses are compatible. Would it be beneficial for employment to only safeguard existing waste management sites for either waste or employment uses where it can be demonstrated there is sufficient capacity in the borough?

Difficulties encountered/assumptions made

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.

The North London waste Authority and the north London Borough Consortium are two separate groups. The NLWA are undertaking the procurement plan and the NLWP Borough group are in change of the NLWP.

Likely significant effects

The policy has had a neutral to positive effect on SA environmental objectives.

Neutral to negative effects for the soil, water and noise SA/SEA topic area – both waste from industrial uses along rivers and canals can reduce water quality.

The policy had significant positive to positive effects on SA Objective 18 on sustainable waste management. Further alignment with the NLWP would improve performance. However there is a need to reference apportionment targets, explain in the supporting text what is meant by compensatory provision and what is meant by maximising the use of existing waste management sites.

The policy had a largely neutral effect upon the social SA objectives. There was a neutral to positive effect on employment. Waste and industrial employment uses are compatible. It may be beneficial for employment to only safeguard existing waste management sites for either waste or employment uses where it can be demonstrated there is sufficient capacity in the borough.

Avoidance/Mitigation

There was reference to reducing waste and increasing recycling in the borough and supporting the NLWA Waste and Recycling Strategy. In relation to bullet point three – The NLWP only identified one new contingency waste site for Hackney - Shepardess Walk, however members are not agreed to this. Need clarity on the position here. There was reference apportionment targets. Explanation of what is meant by compensatory provision and what is meant by maximising the use of existing

waste management sites. Evidence from the NLWP SA on surplus waste sites in Hackney if any within existing industrial locations in particular to support the concept of dual use. Reference to the sensitive development of waste sites along rivers and canals to support improvement in water quality.

Measures taken into account

None taken

Proposals for monitoring

Residual household waste per head. (national), Household waste recycled or composted (national), Municipal waste landfilled (national), Production of primary land won aggregates by mineral planning authority (Core), Production of secondary and recycled aggregates by mineral planning authority (Core) & Capacity of new waste management facilities by waste planning authority (Core) & Amount of municipal waste arising, and managed by management type by waste planning authority (Core)

Core Strategy Policy 33: Promoting Sustainable Transport

Summary

The preferred options sustainable transport chapter has been removed. This policy replaces the three preferred options policies 29, 30 and 31. Potential adverse impacts on reducing the prominence of sustainable transport in the plan, as supporting infrastructure is an essential part of delivering growth.

Neutral to positive performance against social objectives. Neutral to positive performance against economic objective. Positive performance against the transport objective. Neutral to positive performance against environmental objectives.

Difficulties encountered/assumptions made

The details of what is the minimum supporting transport provision 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.

Significant effects

Neutral to positive performance against social objectives. Generally, supporting use of sustainable 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 people's living and working opportunities.

Neutral to positive performance against economic objectives. Improving access supports economic growth, however it is also important to provide access to jobs from those area where transport services may currently be less frequent. . Therefore more focus on increasing transport and access in areas where this is currently low.

Positive performance against the transport objectives. However, see below for recommendations to improve performance. Neutral to positive performance against environmental objectives. However The Habitats Regulations Assessment set out that there may be a combination of effects of air pollutants generated by increasing 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 the 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, the report sets out in page 28 that Policy 34 (Promoting Sustainable Transport) seeks to minimise the contribution of new development to deteriorating air quality as much as possible mitigating this potential effect.

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 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, could 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.”

Avoidance/Mitigation

Reinstate the chapter on transport. Reference to Crossrail even though it is in the early stages. 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 through S106 and appropriate mechanisms to deliver transport and improve accessibility where current levels are poor. Include a section on design against crime initiatives around public transport, 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

No changes.

Proposals for monitoring

Public Transport provisions/accessibility/use (Contextual), Walking/cycling levels (Contextual), Car-free housing schemes (Contextual), Traffic/congestion levels (Contextual), Local bus passenger journeys originating in authority area. (National NI 177), Planning consents completed for major travel generating schemes in accessible locations(Local), Car free and car capped housing (Local, Access to services and facilities by public transport, walking and cycling (National NI 176), Working age people with access to employment by public transport and other specified modes. (National NI 176)

5.10 Cumulative, synergistic and secondary effects

5.10.1 This section discusses the cumulative assessment overview summarises each policy area, accounting for the significant effects identified, the significant effects, the avoidance /mitigation measures, measures taken into account ion the policy changes, and proposals for monitoring.

Table 14: A summary of the cumulative, synergistic and secondary effects

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
Biodiversity	1: To protect and enhance Biodiversity, flora and fauna 2: To ensure efficient use of natural resources	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	The estimated increase in population and urbanization will lead to the potential for negative impacts on valued and biodiversity in Hackney. In addition, the Habitat Regulations Assessment has identified that the Core Strategy 'could not be described a priori as being unlikely to result in significant adverse effects on European sites – Lee Valley SPA & Ramsar site and Epping Forest SAC". This is mainly due to increased recreational pressure and growing demand on abstraction from the waterbodies and deteriorating air quality caused by increased vehicle movements on roads.	Strong mitigatory measures have been developed, for example, the Council aims to promote sustainable design of the new estate in order to reduce the carbon footprint of household. The Cleaner, Greener and Safer and Climate Change and Environmental Sustainability Chapters of the Core Strategy have covered the policies that promote sustainable environment.
Soil, Water, Noise	2. To ensure efficient use of natural resources 4. To reduce noise	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and	The estimated increase in population and urbanization will lead to the potential for negative impacts on soil, water and air quality. The new development may also provide fund to improve the existing water quality.	The Council aims to promote sustainable design of the new estate in order to reduce the carbon footprint. The Cleaner, Greener and Safer and Climate Change and Environmental Sustainability Chapters of the Core Strategy have covered those policies, which will largely promote protect and enhance waterways, renewable energy and energy Efficiency Low Carbon energy Development Flood Risk Waste Promoting Sustainable Transport.

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
		Hackney Wick.		
Air	3: To improve air quality 7. To reduce greenhouse gas emissions and promote efficient use of energy in all activities	<p>All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment.</p> <p>This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.</p>	<p>The majority of London Borough of Hackney lies in an Air Quality Management Area (AQMA) for pollutants like nitrogen dioxide and PM10. The identified potential sources for the pollutants are static industrial sources and road traffic.</p> <p>The estimated increase in population and urbanization will lead to the potential for negative impacts on exacerbating Hackney's air quality. This is mainly due to increased recreational pressure and growing demand on private car uses in relation to road traffic.</p>	<p>The Council has produced an Air Quality Action Plan (AQPA) which sets out the approach we are going to achieve to improve borough's air quality. The action included upgrading the Council's fleet, promoting alternative modes of transport and tackling pollution from industry and idling vehicles as well as a range of other measures. The Core Strategy Climate Change and Environmental Sustainability Chapter has included policies such as Renewable energy and energy Efficiency Low Carbon Energy Development Promoting Sustainable Transport to avoid further damage on air quality.</p>
Climate	5. To minimize ford risk and encourage SUDS 7. To reduce greenhouse gas emissions and promote efficient use of energy in all activities 9. To promote sustainable design	<p>All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment.</p> <p>This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.</p>	<p>The Flood Risk Sequential Test has suggested that Hackney Wick area and other parts of eastern Hackney are at actual risk of flooding.</p> <p>The estimated increase in temperature, population and urbanization will lead to the potential for negative impacts on environment via pressure on resources such as water consumption, poor air quality, and urban heat island effect etc.</p>	<p>Given the Floodwater depths in parts of Hackney Wick, the proposed future development will be subject to an exception test with Environment Agency's advice. Other mitigation methods will involve for example, implementing Sustainable Drainage System for all new development, the Council to work in partnership with the Thames Water through carrying out a more detailed assessment of surface water flooding.</p> <p>London Borough of Hackney is a signatory of the Nottingham Declaration on Climate Change, and it aims to maintain the lowest ecological footprint</p>

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
				compared to other London Boroughs. Other measures of adaptation and mitigation to the climate change include preparing a Climate Change Strategy; promoting the use of green roofs; implementing Code for Sustainable Homes etc.
Waste	18. To minimize waste and maximize recycling in the borough	<p>All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment.</p> <p>This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.</p>	The immense growth that anticipated in the borough over the next 15 years will add huge pressure on waste disposal. Hackney has had relatively poor access to waste collection and recycling facilities the borough.	<p>The Core Strategy strongly supports the objectives of sustainable waste management for new development. This has been addressed in Climate Change and Environmental Sustainability Waste Policy.</p> <p>Furthermore, Hackney has signed up to the Local Area Agreement indicator N191 – residual household waste per household. This aims to achieve an overall reduction in residual household waste by producing less and recycling more. The Council is committed to working with its partner, North London Waste Authority to address this issue through the North London Joint Waste Plan.</p>
Cultural Heritage	9. To protect and enhance the borough's historic environment and preserve the archaeological aspects of the borough	<p>All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment.</p> <p>This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston,</p>	<p>The majority of Hackney listed buildings (2004) were in poor condition and more than 80 percent were unoccupied, which were likely to deteriorate without management.</p> <p>The immense growth that anticipated in the borough over the next 15 years will add huge pressure on designated sites of Archaeology, protected squares and</p>	<p>Archaeological Priority Areas have been established on the advice of English Heritage and the Council will consult them on any archaeological related sites before making any planning decisions. The Policy of Historic Environment in the Core Strategy sets out clear position on preserving or enhancing the value of those historical elements in the borough.</p> <p>In addition, our evidence shows a significant increase</p>

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
		Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	listed buildings.	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.
Population	No specific SA/SEA objective on this topic.	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	Hackney's population is expected to continue to increase over the next 15 years. The growth will require additional housing and social infrastructure to cater for extra needs. In addition, an increasing young ethnically mixed population will need to be treated in a more sensible way in terms of their cultural backgrounds. The potential adverse impacts identified is the implementation of the plan is delayed to accommodate the growth to meet people's needs in terms of accessing decent affordable housing, education, employment and so on.	One of the mitigation methods is to work in partnership with other key stakeholders such as Registered Social Landlord, Olympic Legacy companies, Learning Trust to seek funding and other resources to deliver the goal. In addition, early engagement with the public during the LDF process will be vital to ensure what the Council is going to deliver will meet their needs.
Human Health	3. To improve air quality 4. To reduce noise 10. To reduce poverty and social exclusion 12. To improve the health people and promote healthy lifestyle 15: To increase the number of decent and	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with	Hackney is one of the most health deprived boroughs in the country. The life expectancy is lower than the average for London and the rest of the country. This is mainly related to low income and unemployment. In particular in the most deprived areas such as Hackney Downs,	The mitigation method is to work in partnership with other key stakeholders such as schools and colleges, Olympic Legacy companies, Learning Trust to seek funding and other resources to deliver the goal. A number of policies in the Chapter 5 Supporting Neighbourhoods and Communities have focused on improving human health.

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
	affordable homes. 16: To provide access to an adequate range of support and community facilities.	national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	Queensbridge and Hackney Wick. The growth anticipated, together with the London Olympic Game 2012 is regarded as a catalyst for economic regeneration in the borough. As a result of this, potential positive impacts will be more opportunities for skills training, improvement of infrastructures such as public transport and health facilities. However, the potential negative impact such as increase in urbanization may also increase pollution levels in air, soil and water quality that may affect people's health.	Another policy in Chapter 9 Climate Change and Environmental Sustainability – Policy of Promoting Sustainable Transport encourages people to reduce travel back and choose walking and cycling.
Poverty and Social Exclusion	16: To provide access to an adequate range of support and community facilities 10: To reduce poverty and social exclusion and promote cultural diversity. 13: To promote educational attainment and the skill level of the population 20: To generate employment opportunities for everyone 15: To increase the number of decent and affordable homes	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	The potential positive impacts of external investment in Hackney will help boost local economy, addressing the deprivation inequalities that exist in Hackney and improving the existing condition of service provision in the borough. However, the potential risk will be that poverty and social exclusion may increase if the Council fails to bring the regeneration benefits to the most affected areas in the borough e.g. local people is in disadvantage to obtain training for new skills	A number of policies support regeneration, including those that promote a high quality and accessible public realm and green infrastructures will be implemented and monitored through partnership approach to avoid misplacement or social failure of regeneration in Hackney.

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
			to access jobs created by the regeneration projects.	
Employment and Skills	13:To promote educational attainment and the skill level of the population 20: To generate employment opportunities for everyone	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	The potential positive impacts of external investment in Hackney will help boost local economy, addressing the deprivational inequalities that exist in Hackney and improving the existing condition of service provision in the borough. However, the potential risk will be that poverty and social exclusion may increase if the Council fails to bring the regeneration benefits to the most affected areas in the borough e.g. local people is in disadvantage to obtain training for new skills to access jobs created by the regeneration projects.	A number of policies support regeneration, including those that promote a high quality and accessible public realm and green infrastructures will be implemented and monitored through partnership approach to avoid misplacement or social failure of regeneration in Hackney.
Crime and Safety	14: To reduce crime, the –fear of crime and anti-social behaviour in the borough.	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and	Hackney's residents have a greater fear of crime than those living in other parts of London and the rest of the country. The type of crime and anti-social behaviour is unevenly distributed across the borough due to the characteristics of different areas. The anticipated growth and the 2012 London Olympic Games is seen as a catalyst for economic regeneration of the borough. The potential positive impacts of external	Core Strategy Policy focuses on high quality of design will contribute to mitigate crime issue through working in partnership with key stakeholders such as Metropolitan Police, residents associations and other relevant organisations.

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
		Hackney Wick.	investment in Hackney will help boost local economy, addressing the deprivational inequalities that exist in Hackney and improving the existing condition of service provision in the borough. This may help reduce the level of crime through improving environmental quality and reducing unemployment.	
Transport	6: To reduce the need to travel and encourage the use of public transport including walking and cycling 7: To reduce greenhouse gas emissions and promote the efficient use of energy in all activities	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	The potential positive impacts of external investment in Hackney will help boost local economy, addressing the deprivational inequalities that exist in Hackney and improving the existing condition of service provision in the borough. This will help improve accessibility for everyone to all services, facilities, recreational opportunities and employment. In addition, encouraging using of public transport may also help reduce the number of travelling by car. However, the potential risk will be if the Council fails to deliver the transport facilities on time.	A number of policies in the Core Strategy have looked at Transport from both accessibility and environmental perspectives. The policies will be implemented and monitored through working in partnership with key stakeholders such as Transport for London, Greater London Authority, Hackney Transport section and so on.
Housing	15: To increase the number of decent and affordable homes 10: To reduce poverty and social exclusion	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good	The potential positive impacts of external investment in Hackney will help boost local economy, addressing the deprivational inequalities that exist	A number of policies in chapter 7 Providing Better Homes have provided housing policies from different aspects. The Council will review the existing Affordable Housing

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
	and promote cultural diversity 11: To encourage complementary activities an land uses together to make a more efficient and effective use of land.	accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	in Hackney and improving the existing condition of service provision in the borough. Most of the housing growth will occur in the growth locations identified in the Core Strategy Policies in the Delivering Growth chapter where the greatest housing need exist. However, the potential risk will be that poverty and social exclusion may increase if the Council fails to bring the regeneration benefits to the most affected areas in the borough e.g. local people is in disadvantage to access decent housing due to lower income in association with worklessness.	SPD (2006) to provide detailed and up-to-date guidance to further support the implementation of the suite of new housing policies. A new London wide Housing Capacity Study and Strategic Housing Market Assessment are under review to support the LDF Core Strategy Housing Policies and the future Updated Affordable Housing SPD.
Economy	19: to promote sustainable economic growth.	All the Proposed Policies from the Chapter 4 Delivering Growth, The chapter identified places in the borough that already benefit from good accessibility, established social infrastructure and programmes for redevelopment. This is in a general conformity with national and London Plan Policy. The key growth locations include Dalston, Hackney Central, and the railway corridors, the City Fringe, Woodberry Down and Hackney Wick.	The anticipated growth and the 2012 London Olympic Games are seen as a catalyst for economic regeneration of the borough. The potential positive impacts of external investment in Hackney will help boost local economy, addressing the deprivational inequalities that exist in Hackney and improving the existing condition of service provision in the borough. The potential negative impact will occur on those areas outside growth locations. These areas may not	A number of policies in the Delivering Growth Chapter 4 have set out the sustainable growth agenda in Hackney. For these areas outside those growth locations, there is a general presumption in line with national and London Plan policy, in favour of increasing density of development commensurate with the capacity of infrastructure, and the existing urban character. An Infrastructure Study will be produced to further support the growth locations.

Cumulative, synergistic and secondary effects				
SA/SEA Topic Area	SA/SEA Objective	Proposed Policies	Cumulative, synergistic and secondary effects	Mitigation measure /section reference.
			benefit from the regeneration. Therefore the economic development may not evenly distributed to different parts of the borough.	

6 Final recommendations

6.1.1 This Chapter aims to bring together the key findings of the SA. The conclusions of the Sustainability Appraisal assessment are summarised below.

- The sustainability of the plan hangs on the delivery of the Core Strategy policies in combination. This requires the Proposed Submission Core Strategy policies should be delivered in conjunction with each other, and other relevant DPDs and SPDs i.e. Hackney Central & Focusing Social Investment & Renewable and Low Carbon Energy Development and so on. It is recommended that (not to the exclusion of other policies) the key policies should operate together and be cross referenced. This will avoid the risk of certain policies being cherry picked at the delivery stages. All documents in the Local Development Framework must be consistent with the Core Strategy once this is adopted. Where this does not occur, for example the South Shoreditch SPD, clear direction on which aspects that have been superseded must be given.
- A revised S106 Planning Obligations SPD should be produced, under the full statutory planning process.
- The proposed Development Management DPD should include policies which have been developed in consultation with Environmental Health on reducing noise and other impacts associated to development construction phases of new developments and the night time economy.
- An Affordable Housing LDD should be developed , detailing the optimum manner in which the strategic housing policies should be delivered to meet the individual needs of each ward.
- To make the process of undertaking a Sustainability Appraisal quicker and more efficient, coordination between Sustainability Appraisal officers and the Local Strategic Partnership should be achieved so future work can be streamlined.
- The Site Allocations DPD should seek to allocate sites to meet the needs of the Gypsy and Traveller Community.
- Ongoing joint working group meetings with Planning Policy and Strategy, Strategic Projects, Development Control the Local Strategic Partnership and other relevant teams should monitor the process of the implementation of each policy against Sustainable Community Strategy targets.

- Flood Risk is not just experienced in the Flood Risk Zones. Pluvial flooding can also occur as a result of poor drainage and heavy rainfall. All large planning applications of over 10 dwellings should consult the Council's Emergency Planning Team.
- Detailed recommendations have been set out for the emerging Area Action Plans, Development Plan documents and Supplementary Planning documents to ensure that in the implementation of all Core Strategy policies the social, environmental and economic effects are fully considered and mitigated against.
- The SA identified significant adverse impacts resulting from inappropriate development in Flood Zone 3. A sequential test is based on a policy justification. It does not mean there is actually less of flood risk. Our evidence base suggests that Hackney's population would be less equipped to deal with the impacts of flooding compared to more affluent communities and therefore residential development should not be located in high risk areas. This position should be reflected in the Hackney Wick and Fish Island Area Action Plan.
- There is an absence of a detailed study which analyses our current social infrastructure and clarifies the predicted needs to accompany the planned growth over the next 15 years. This is required to achieve our objectives to reduce poverty and social exclusion.
- A great deal of transport infrastructure is planned in the borough, however a continued commitment to delivery of additional improvements to the public transport network is required to support the planned growth.
- Proposals for monitoring are taken forward by the Monitoring Team. The SA issues will be reflected in the next Annual Monitoring Report.
- An ecological survey is needed to clarify what habitats and species there are in the borough and to support the emerging Local Biodiversity Action Plan. This will allow the Proposed Submission Core Strategy Biodiversity Policy 27 to be delivered. The objectives of the Sustainable Community Strategy 2008 do not make specific reference to protection of Biodiversity in the Borough. An update of this is also recommended.
- There is a lack of up to date evidence on the potential which the arts and cultural activities could have in helping to regenerate Hackney's economy. Significant increases in these uses have been recorded in the South Shoreditch area. Further research is needed here to ensure opportunities are fully maximised, to contribute to Hackney's objectives for delivering economic growth.

- Growth Area Policy Blocks: There should be not lack of clarity for regeneration and development control about which policies must be applied to the growth areas. Each of the growth area polices should be accompanied by a box indicating the most relevant supporting infrastructure policies that must be applied. Key issues should also be noted when the policy is being implemented which should be resolved at the more detailed development level. Sign off of all essential policies for each of the key growth areas should be demonstrated by the regeneration team or a Development Control officer.