London Legacy Development Corporation

LLDC Local Plan 2020-2036

Integrated Impact Assessment - Post Adoption Statement

2017-0020-003

Final | July 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

This is a Post Adoption Statement, prepared under Regulation 16 (4) of the Strategic Environmental Assessment (SEA) Regulations¹, for the Integrated Impact Assessment (IIA) of November 2018² and IIA addendum of January 2020³ (which together comprise the 'IIA report') undertaken for the adopted London Legacy Development Corporation (LLDC) Revised Local Plan 2020.

The SEA Regulations require the Post Adoption Statement to cover the following items:

- 1. How environmental considerations have been integrated into the Plan and the IIA report taken into account (Section 3);
- 2. How consultation responses to the report have been taken into account (Section 4);
- 3. Reasons for choosing the Plan as adopted in the light of the other reasonable alternatives (Section 5);
- 4. The measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan (Section 6).

This Post Adoption Statement relates to the IIA, which includes health, equalities and safety considerations as well as the environment and sustainability considerations required under the SEA Regulations.

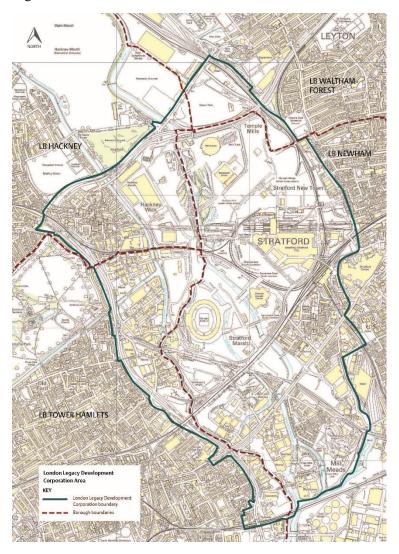
¹ Environmental Assessment of Plans and Programmes Regulations 2004

³ IIA (addendum) of the draft revised LLDC Local Plan, available at https://www.queenelizabetholympicpark.co.uk/-/media/lldc-local-plan-mods-iia-aa-addendum-web.ashx?la=en

2 Background

The LLDC is a Mayoral Development Corporation in east London and the local planning authority for the area shown in Figure 1. The LLDC has the full range of planning functions that would normally be available to a local planning authority, including plan making powers.

Figure 1: LLDC Area



The previously adopted LLDC Local Plan⁴ is the statutory Development Plan for the LLDC Planning Area. It reflects the LLDC's vision and strategy for the area as a whole and provides the policy framework that will help to shape change and development that meets these goals.

The previously adopted LLDC Local Plan was originally adopted in July 2015 for the period from 2015 to 2031 ('the adopted Plan). In response to the rapidly

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⁴ Adopted Local Plan 2015 to 2031 (Document LD1) available at https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/examination-2019/local-documents/ld1-local-plan-july-2015.ashx?la=en

changing nature of the LLDC planning area and to reflect updates in regional policy, the draft Revised Local Plan was prepared and consulted on between 05 November and 17 December 2018 under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended ⁵. During its development, the draft Revised Local Plan was subject to both an Integrated Impact Assessment ('2018 IIA') and an Appropriate Assessment ('2018 AA⁶').

The 2018 IIA followed the stages of the SEA methodology⁷ and incorporated four assessments including:

- Strategic Environmental Assessment;
- Equalities Impact Assessment (EqIA);
- Health Impact Assessment (HIA); and
- Crime and Safety Impact Assessment (CSIA).

Subsequent additional modifications to the draft revised Local Plan were assessed within the 2020 IIA addendum.

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⁵ Consultation carried out under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

⁶ The 2018 AA was prepared in accordance with the European Habitats Directive enacted by Conservation (Natural Habitats, & c.) Regulations 1994 (The 'Habitats Regulations').

⁷ The 2018 IIA was carried out in accordance with the procedures set out in the Environmental Assessment of Plans and Programmes Regulations (EAPP) 2004.

3 Integration of IIA considerations into the Plan

The IIA process and report has actively influenced the development of the revised Local Plan through adopting an iterative and collaborative process to ensure the chosen policies successfully address key social, environmental and economic issues, and ultimately contribute to sustainability.

The IIA comprised five stages, undertaken iteratively and in consultation with the LLDC and wider stakeholders.

IIA Stage A: Scoping report⁸

- The context and baseline for the assessment were established.
- An assessment framework of 24 objectives was developed in consultation with LLDC to ensure robust and relevant assessment of policies.
- Stakeholder consultation responses were taken into account; these are set out in Section 4 of this document.

IIA Stage B: Developing and refining options and assessing effects

- A screening exercise was undertaken to ensure that assessment was targeted at those policies within the draft revised Local Plan that were new or that were subject to significant changes.
- An assessment framework consisting of 24 environment, sustainability, health, equalities and safety objectives was used to undertake the assessment. The framework was developed collaboratively with the LLDC and based on the Greater London Authority (GLA) IIA framework.
- Mitigation and recommendations were proposed to LLDC through an iterative process where refined second draft policies were then reassessed.

IIA Stage C: Preparing the IIA report

- For each policy that was subject to IIA, the report recorded:
 - The initial environmental review of the policy and any alternative options (where appropriate), including a description of the likely effects that would arise from the adoption of the policy as proposed.
 - The initial recommendations made for changes to the policy to both enhance positive effects and/or reduce adverse effects.
 - The response from LLDC to the recommendations (e.g. the proposed change was adopted, or a cross-reference was added to more clearly highlight another policy which covered the recommendation).

https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-review-2017/oct-17/integrated-impact-assessment-of-the-lldc-local-plan-sep-17.ashx?la=en

⁸ LLDC Local Plan IIA Scoping Report, available at:

- The final appraisal of the policy inclusive of any changes made by LLDC. Each final appraisal is supported by a colour-coded visual representation of the assessment framework that provides a breakdown of the assessment against each objective.
- A Habitats Regulations Assessment (HRA) was also undertaken and included as an appendix to the IIA report. This assessment consisted of screening all policies to establish the likelihood of significant effects on any Natura 2000 sites occurring, and further Appropriate Assessment (AA) where there was a potential for such effects.

Further detail on the assessment methodology is set out within Section 2 of the IIA report.

IIA Stage D: Examination

The report from the Planning Inspector found that the IIA clearly set out the options and the process leading to the preferred changes to the Plan, and that the IIA addendum was comprehensive⁹.

IIA Stage E: Monitoring

- Details of the monitoring stage of the IIA were to be provided within the Post Adoption Statement. These are set out in Section 6 of this document.

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⁹ Inspector's report to the LLDC, available at: https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/examination-2019/inspectors-reports/appendix-1 inspectors-lldc-revised-lp_final-report.ashx?la=en

4 Consultation responses

Consultation was carried out throughout the IIA process. Table 1 sets out comments made on the IIA and how these responses have been taken into account. Responses to the IIA consultation were only received during the scoping stage (IIA Stage A) of the 2018 IIA.

Table 1: Scoping report consultation responses

Name of organisation	Comments made on the IIA	Where addressed
Environment Agency	Emphasise that developments should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and the obligations of the Water Framework Directive (WFD).	Objective 18 covers water targets and obligations across London and references WFD.
Environment Agency	Make reference to building resilience to biodiversity and wildlife through opportunities provided through development.	Objective 20 covers aspects of biodiversity and wildlife. The key guiding questions promote conserving, enhancing and creating habitats and enhancing the ecological function within London.
University College London	Make reference to improving prosperity in East London.	Growth of businesses in East London is part of the key guiding questions in Objective 10.
Private individual	Provide a clear and accessible document.	A non-technical summary will be published.

5 Reasons for choosing the Plan as adopted

The IIA objectives were agreed with LLDC to align with the overall vision and direction for the revised Local Plan. All policies were assessed against these objectives using the 24 objective assessment framework.

Those policies adopted were done so following appropriate review to identify the best possible performance against the IIA objectives, whilst also taking into account a realistic delivery approach, national and local planning policy, and consultation responses.

Where a policy had multiple options for consideration, each option was subject to equal review against the assessment framework, and a summary was provided of the options appraisal alongside the full assessment of the preferred option and a justification of the selection of the preferred option. For completeness and transparency, Appendix D to the 2018 IIA¹⁰ contained the full appraisal of all the rejected options against the assessment framework.

The details of the different options were specific to each policy. The majority of policies for which there were several options were predominantly related to housing. For these policies there generally comprised a choice between updating the policy based solely on the new London Plan and updating the policy based on the new London Plan but with additional consideration to one or more local requirements. The nine policies where options were considered, and a preferred option selected, are summarised in Table 2.

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¹⁰ Appendix D, IIA of the draft revised LLDC Local Plan, available at: https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-review-2017/regulation-19-documents/iia-and-hra-report.ashx?la=en

Table 2: Summary of policy options and preferred options (from 2018 IIA section 8¹¹)

Policy	Options assessed (preferred option in bold)	Justification for selection of preferred option
B.1 Location and maintenance of employment uses	 Do not amend as it is sound as existing. Update to reflect new approach to industrial land within the draft New London Plan to protect industrial floorspace capacity, making distinctions between the different types of employment clusters. Update to reflect the new approach to industrial land within the draft London Plan to protect industrial floorspace capacity with a unified approach to employment clusters. 	The preferred option ensures industrial land is protected and businesses are located in appropriate areas and alongside complementary industries. This encourages growth in the Planning Area and protects existing employment.
H.1: Providing for and diversifying the housing mix	 1a. To update from the Housing Requirements Study (HRS) evidence requirements on housing mix requirements. 1b. As 1a and the London Plan direction for housing delivery including small sites and reference to design codes. 2a. To update from HRS evidence requirements on housing mix requirements with increased specificity. 2b. As 2a and the London Plan direction for housing delivery including small sites and reference to design codes. 3a. As 2a and the inclusion of build to-rent specifically. 3b. As 2b and the inclusion of build to-rent specifically. 	The preferred option complies with the draft New London Plan (2018) and also considers build-to-rent accommodation and the delivery of specific housing types, meeting the housing needs of the LLDC Planning Area.

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¹¹ Section 8, IIA of draft revised LLDC Local Plan, available at: <a href="https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-review-2017/regulation-plan-review-2017/regu 19-documents/iia-and-hra-report.ashx?la=en

Policy	Options assessed (preferred option in bold)	Justification for selection of preferred option
H.2: Delivering affordable housing	1a. Update to reflect draft London Plan requirements and within AHV SPG (Affordable Housing Viability Supplementary Planning Guidance) including by habitable room setting out local requirement for the 40% based upon HRS information. 1b. Update to reflect draft London Plan requirements and within AHV	The preferred option complies with the draft New London Plan and the affordable housing delivery viability tested routes, it also includes build-to-rent provision and specifies the delivery of both affordable and intermediate housing.
	SPG including by habitable room utilising HRS housing requirements information. 2a. As 1a plus reference to Build-to-rent (see Policy H.7).	
	2b. As 1b plus reference to Build-to-rent (see Policy H.7).	
H.3: Meeting accommodation needs of older persons households	Update to reflect draft London Plan policy H15. Update to reflect draft London Plan policy H15 and include updated C2/C3 distinctions. Discreption of accommodation to meet needs.	The preferred option complies with the draft New London Plan. It specifies the need to provide C2 and C3 accommodation, ensuring the specific older persons housing needs of the LLDC Planning Area are fully met.
H.4: Providing student accommodation	To reflect draft London Plan considerations. To reflect draft London Plan considerations with locational preferences.	The preferred option complies with the draft New London Plan and identifies specific locations for student accommodation to ensure student housing delivery is in appropriate and well-connected areas.
H.5: Location of gypsy and traveller accommodation	Update to reflect new London Plan definitions. Update to reflect new London Plan definitions plus further reference to duty to cooperate.	The preferred option complies with draft New London Plan. It also sets a requirement to cooperate with neighbouring authorities to deliver gypsy and traveller housing, ensuring housing requirements can be met across the local area.

Policy	Options assessed (preferred option in bold)	Justification for selection of preferred option
H.7: Shared living accommodation	 Do not include a shared living policy and rely upon London Plan H18. Include a local shared living policy to take account of H18 with local definitions. Include a local shared living policy to take account of H18 with local definitions and locational direction. Refer to shared living as one product within a new 'Innovative Housing Models' policy. 	The preferred option sets out a new shared living accommodation for the Local Plan and identifies appropriate areas where this specific type of accommodation is required.
BN.4: Designing development	 Redraft policy to simply exclude reference to the Baseline Standards and refer only to the Nationally Described Space Standards. Replace reference to the baseline standards with reference to the LLDC Design Quality Policy as a source of guidance on approach to quality standards for all development in the LLDC area. Redraft policy to exclude reference to the baseline standards, add reference to the LLDC Design Quality Policy and include the generally applicable policy elements of Policy BN.10. This would also include the rebadging of the policy to include mixed-use development and a reference to non-residential development. This would form part of a wider revamp of built design policies, in particular Policy BN.10 which would be made more specific. In this scenario Policy BN.10 would be relocated to follow on from Policy BN.4. 	The preferred option references the LLDC Design Quality Policy, encouraging high-quality design. It goes further to ensure the policy applies to mixed-use development, not just residential, to deliver wider regeneration across the LLDC Planning Area.
BN.5: Proposals for tall buildings	1. No change, with policy wording retained as in current plan. Policy seen as a helpful tool in addressing development height without being prescriptive.	The preferred option sets out specific design requirements for tall buildings. It also sets a requirement for detailed planning applications to

Policy	Options assessed (preferred option in bold)	Justification for selection of preferred option
	 Minor amendments to the policy to clarify expectations in terms of the "outstanding architecture" requirement in the policy where this has been a point of contention in interpretation of the policy in practice. This would clarify that meeting the relevant tests in the Policy will be what defines this term. Subsequent points in the policy. Adds amendment to the relevant parts of the four sub area sections in the Plan that define the building height at which Policy BN.10 will apply. These aim to achieve greater consistency between the approach across the sub area sections of the Plan. The specific changes are identified in the changes for each sub area in this document. Incorporates Option 2a to ensure consistency of the policy application within each of the four sub area sections of the plan. It would also reformulate the policy to move more general design criteria to Policy BN.4, expand and make more specific the remaining policy criteria and move the text on location of tall buildings to the start of the policy. 	be submitted for tall building development, ensuring the full impact of the developments are fully understood.

Monitoring the implementation of the Plan

In line with the SEA Regulations, IIA monitoring should be conducted as part of the overall approach to monitoring the success of the Local Plan objectives. The revised Local Plan sets out a framework for monitoring Local Plan objectives against defined Key Performance Indicators (KPI). Table 3 sets out how IIA objectives should also be monitored within this framework. Supporting information providing the full Local Plan and IIA objectives is provided in Table 4 and Table 5 respectively.

Table 3: Local Plan KPI and the IIA objectives each will support. (Partially replicated from LLDC Local Plan Table 15)

No.	Key Performance Indicator	Monitoring criteria	Local Plan objective (Table 4)	IIA objective (Table 5)
1	Growth in economic activity	Percentage of working-age residents in employment within the four Growth Boroughs compared to the London average. Net gain/loss in employment floorspace (B Use Class) compared to 2015 baseline. Amount of low-cost business space and affordable workspace permitted.	1	1, 10
2	Improvements in IMD	Changes in Indices of Multiple Deprivation within Wards that fall within the Legacy Corporation area.	1, 2, 4, 5	1, 2, 3, 4, 5, 7, 8, 13, 14, 20, 21, 24
3	Improvements in health	Changes in health indicators for residents within Wards that fall within the Legacy Corporation area. Changes in life expectancy for residents within Wards that fall within the Legacy Corporation area.	2, 3, 5	3

No.	Key Performance Indicator	Monitoring criteria	Local Plan objective (Table 4)	IIA objective (Table 5)
4	Creation of retail centres	Net gain/loss in retail and leisure floorspace (A1–5, C1 and D2 Use Classes) within the identified centres. Vacancy rates within the identified centres compared to the London average. Number of jobs/local jobs/opportunities within employment training initiatives created.	1	10, 11
5	Supply of housing	Number of homes permitted per annum and the tenure breakdown. Number of 'affordable' homes permitted per annum. Number of homes completed per annum. Number of 'affordable' homes completed per annum and the tenure breakdown. Number of one-, two- and three-bedroom plus units permitted per annum (per cent of total). Amount of accommodation provided for students, older persons and gypsies and travellers. Number of specialist older persons unit/bedspaces permitted and completed per annum.	2	5
6	Provision and protection of community facilities	Net gain/loss in community floorspace (D1 Use Class). On-site community infrastructure secured through S106 Agreement as part of large-scale development. Number of school places provided and /or granted planning permission.	2	2, 11

No.	Key Performance Indicator	Monitoring criteria	Local Plan objective (Table 4)	IIA objective (Table 5)
		Number and capacity of new health facilities approved.		
7	Protecting heritage assets and improving design quality	Loss of heritage assets. Proportion of relevant approved applications (proposing non-residential use) that incorporate all applicable elements of the Legacy Corporation's Inclusive Design Standards. Proportions of relevant approved applications (proposing residential use) that provide 90 per cent of dwellings in accordance with Optional Requirement M4 (2) Category 2 of Part M of the Building Regulations, and 10 per cent of dwellings in accordance with Optional Requirement M4 (3) Category 3 of Part M of the Building Regulations. Proportion of relevant approved applications (proposing residential use) meeting the Nationally Described Space Standards – Technical Requirements. Proportion of relevant approved applications that meet 'Site layout planning for daylight and sunlight' (BRE, 2011) or superseding guidance.	3, 5	7, 8, 12, 21
8	Retaining open space	Quantum of open space gained or lost through development.	3, 5	6, 20
9	Protect biodiversity and habitat	Number of applications approved for development schemes that provide a net gain. Number of applications approved for development schemes meeting the Urban Greening Factor target.	3, 5	6, 20, 22

No.	Key Performance Indicator	Monitoring criteria	Local Plan objective (Table 4)	IIA objective (Table 5)
10	Improving the waterway environment	Number of applications approved for major development schemes next to the waterways including measures to improve the environment of the Blue Ribbon Network.	3, 5	18, 20
11	Managing transport impacts	Number of Travel Plans entered into through either condition or S106 Agreement Travel Plan reviews to monitor: 1. Trip generation rates. 2. Mode share and change in mode share over time. 3. The effectiveness of the Travel Plan measures. 4. The effectiveness of delivery and servicing strategies.	4, 5	9
12	Delivering electric- charging infrastructure	Number of electric-charging points approved.	4, 5	9, 11, 17
13	Car parking provision	Number of applications approved for car-free or car-capped development schemes. Net gain/loss of car parking spaces.	4, 5	9
14	Cycle parking provision	Net gain/loss of cycle parking spaces.	4, 5	9

No.	Key Performance Indicator	Monitoring criteria	Local Plan objective (Table 4)	IIA objective (Table 5)
15	Delivering transport infrastructure	Infrastructure provided on site as part of development e.g. new junctions, new cycle paths, new footpaths.	4, 5	11
16	Reductions in carbon emissions	Number of applications approved for major development schemes (proposing residential use) that achieve a 40 per cent or greater improvement on 2010 Building Regulations Target Emission Rate, or from 2016 onwards achieve a Zero Carbon target (including any permitted allowable solutions). Number of applications approved for major development schemes (proposing non-residential use) that achieve a 35 per cent or greater improvement on 2013 Building Regulations TER, meet building regulations requirements from 2016 to 2019, or from 2019 onwards achieve a Zero Carbon target (including any permitted allowable solutions). Number of applications approved for major development schemes (proposing non-residential use) achieving a minimum of BREEAM 2011 'Very Good', while achieving a maximum score for water use (or an equivalent in any future nationally recognised assessment scheme).	3, 4, 5	16, 17
17	Water efficiency	Number of applications approved for major development schemes designed to achieve 110 litres of water use per person per day or less.	3, 4, 5	18
18	Planning obligations	The Annual Monitoring Report (AMR) will include a breakdown of all financial and non-financial obligations secured through S106 Agreement.	All	All

Table 4: Local Plan objectives¹²

No.	Local Plan objective
1	Increase the prosperity of east London through growth in business and quality jobs, with an emphasis on cultural and creative sectors, promotion as a visitor and tourist destination, and high-quality higher education and training opportunities.
2	Establish and maintain locally distinctive neighbourhoods which meet housing needs, while providing excellent and easily accessible social infrastructure.
3	Create a high-quality built and natural environment that integrates new development with waterways, green space and the historic environment.
4	Secure the infrastructure required to support growth and convergence.
5	Deliver a smart, sustainable and healthy place to live and work.

¹² Section 3, draft revised LLDC local Plan, available at: https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-review-2017/regulation-19-documents/illustrative-document/local-plan section-03.ashx?la=en

Table 5: IIA objectives ¹³

No.	IIA objective
1	Equality and inclusion
	To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population.
2	Social Integration
	To ensure London has socially integrated communities which are strong, resilient and free of prejudice.
3	Health and Health Inequalities
	To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities.
4	Crime, safety and security
	To contribute to safety and security and the perceptions of safety.
5	Housing Supply, Quality, Choice and Affordability
	To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand.
6	Sustainable Land Use

¹³ Section 7, IIA of the draft revised Local Plan, available at: https://www.queenelizabetholympicpark.co.uk/-/media/lldc/local-plan/local-plan-review-2017/regulation-19-documents/iia-and-hra-report.ashx?la=en

No.	IIA objective
	Make the best and most efficient use of land so as to support sustainable patterns and forms of development.
7	Design
	To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing a sense of place and distinctiveness, reducing the need to travel by motorised transport.
8	Accessibility
	To maximise accessibility for all in and around London.
9	Connectivity
	To enhance and improve connectivity for all to, from within and around London and increase the proportion of journeys made by sustainable and active transport modes.
10	Economic Competitiveness and employment
	To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economic economy structure providing opportunities for all.
11	Infrastructure
	To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness.
12	Culture

No.	IIA objective
	To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position.
13	Education and skills
	To ensure the education and skills provision meets the needs of London's existing and future labour market and improves life chances for all.
14	Air quality
	To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure.
15	Climate change adaptation and mitigation
	To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks.
16	Climate change adaptation and mitigation
	To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.
17	Energy use and supply
	To manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system.
18	Water resources and quality
	To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system.

No.	IIA objective
19	Flood risk
	To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding.
20	Natural Capital and Natural Environment
	To protect, connect and enhance London's natural capital including important habitats, species and landscapes and the services and benefits it provides.
21	Historic Environment
	To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.
22	Geology and soils
	To conserve London's geodiversity and protect soils from development and over intensive use.
23	Materials and waste
	To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates.
24	Noise and vibration
	To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure.