

Sustainability Appraisal (SA) for the London Borough of Barking and Dagenham Council's Local Plan

SA Report - Second Regulation 19 Consultation Version

Non-Technical Summary (NTS)

The London Borough of Barking and Dagenham Council

October 2021

Quality information

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Revision	Revision date	Details	Name	Position
V1	15/10/21	Working Draft SA Report for internal review	Cheryl Beattie	Principal Environmental Planner
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1. Introduction

- 1.1 AECOM is commissioned to provide support for the Sustainability Appraisal (SA) of the emerging London Borough of Barking & Dagenham Council's Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹
- 1.2 At the current time, this Non-Technical Summary (NTS) and the main SA Report are published alongside the Second Revision Regulation 19 Consultation Version of the Local Plan.

Structure of the Interim SA Report/ this NTS

- 1.3 Sustainability Appraisal reporting essentially involves answering the following questions in turn:
 - 1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
 - 2. What are the SA findings at this stage?
 - i.e. in relation to the Draft Plan.
 - 3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan?
- 1.4 Each of these questions is answered within a discrete 'part' of the Interim SA Report, and summarised in turn below in this NTS. Before answering these questions however, two initial questions are answered in order to further 'set the scene': i) what is the plan trying to achieve?, and ii) what is the scope of the SA?

What is the Local Plan seeking to achieve?

1.5 The following vision has been developed for growth in the Borough:

"By 2037, we want to realise our vision for inclusive growth, to harness the growth opportunity that arises from our people, our land and our location, while ensuring it is sustainable and improves prosperity, wellbeing and participation for all. This will mean achieving our objective to deliver:

- 44,051 high-quality new homes that meet the needs of our residents and working Londoners in the plan period in safe and 'liveable' neighbourhoods, which are well supported by optimum health, education and community facilities.
- 20,000 jobs in diverse enterprises, from media to biotech to food-based industries; reasserting our role as a key part of London's industrial engine and an important economic centre in our own right.
- 463 hectares of beautiful parks and natural open spaces in combination with development of energy-efficient homes and a decarbonised energy system to make our borough the 'Green Capital of the Capital'.
- 7 areas characterised by distinctive neighbourhoods that are well-connected to each other and where residents and businesses are connected to the opportunity development and growth brings.
- 0 people left behind."

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2021). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

What is the scope of the SA?

- 1.6 The scope of the SA is essentially reflected in a list of sustainability objectives, developed subsequent to a 'scoping' process (which included consultation on the scope of the SA in 2015). Since 2015, the SA scope has evolved as new evidence has emerged. The SA scope was reviewed and updated in 2019 and presented in the Interim SA Report (Nov 2019).
- 1.7 SA objectives and assessment questions were established to address the key issues. Taken together, the sustainability objectives and key questions as presented in **Table 1.1** below provide a methodological 'framework' for undertaking the appraisal of the Local Plan and reasonable alternatives.

Table 1.1: SA framework

SA theme	SA objective	Assessment questions (will the option/ proposal help to)	
Biodiversity	Protect and enhance biodiversity within and surrounding the borough, and ensure net gain in biodiversity	 Protect SINCs, priority habitats, and priority or protected species? Contribute to the London Plan regional BAP Habitat Targets, LBAP habitat targets and/or opportunities identified in NCAs 81 and 111, and London Natural Signatures? Reduce deficiency in access to nature for local residents? Contribute to the Barking and Dagenham Green infrastructure and Biodiversity Strategy, the All London Green Grid or wildlife corridors? Ensure development can comply with the Urban Greening Factor set out in the Draft London Plan 	
Climate change	Improve the resilience of the borough to the potential impacts of climate change, including flooding, including by encouraging the use of SuDS	 Reduce the risk of fluvial or tidal flooding? Reduce the risk of groundwater flooding and / or surface water flooding? Avoid locating new homes in areas of flood risk? Promote the use of SUDS? Deliver innovative design solutions, considering the latest design guidance such as the 2019 National Design Guide. 	
	Reduce the level of emissions which contribute to climate change	 Reduce CO2 emissions? Reduce energy consumption per capita? Increase the quantity of green cover? 	
Economy and employment	Increase employment opportunities for local people Increase access to educational and vocational training for all local residents Encourage growth of local businesses and economic diversification and attract inward investment	 Reduce unemployment overall? Increase employment opportunities for young people? Improve the qualifications and skills of young people? Improve the qualifications and skills of adults? Increase the number of local businesses? Improve the small business economy? Improve the local economy? Attract inward investment? Support economic diversification? 	
and water	Reduce harmful emissions and improve air quality Reduce noise and light	 Maintain or improve local air quality? Achieve the National Air Quality Strategy Objectives? Reduce the number of people exposed to noise 	
quality)	pollution	 Reduce light pollution, including glare, light trespass and sky glow? 	
	Improve chemical and biological water quality	Improve the ecological and chemical quality of surface and groundwater bodies?Contribute to river restoration?	

SA theme	SA objective	Assessment questions (will the option/ proposal help to)
	Remediate contaminated land	Remediate contaminated land?
Health and wellbeing	Improve the health and wellbeing of LBBD residents	 Improve overall wellbeing? Improve participation levels in sport amongst adults? Improve provision of allotments? Improve accessibility of leisure centres? Improve the provision of open space? Promote the use of sustainable transport modes such as walking and cycling? Support accessible and legible networks with a clear pattern of streets? Reduce fuel poverty? Control hot-food takeaway provision in the Borough? Support the delivery of high-quality design and functional, accessible, and/or lifetime homes supporting long-term resident health and wellbeing
Historic environment	Conserve and enhance the significance of the borough's historic environment, heritage assets (including archaeology) and their settings and the cultural environment	 Protect, and where possible, enhance heritage assets and their settings? Protect, and where possible, enhance conservation areas? Protect, and where possible, enhance the wider historic environment? Support successful integration of new homes that relate positively to their historic setting. Support access to, interpretation and understanding of the historic environment?
Land, soil and water resources	Promote the reuse of brownfield land	Contribute to the reuse of brownfield land of low biodiversity value?
	Reduce water consumption within the borough	Reduce water consumption?
	Reduce amount of waste sent to landfill	 Reduce the amount of waste produced and move it up the waste hierarchy? Encourage recycling of materials and minimise consumption of resources during construction?
Landscape and townscape	Protect and enhance the character, setting and quality of landscapes and townscapes	 Protect and enhance landscape and townscape character and distinctiveness? Deliver high-quality design, in line with government guidance such as the 2019 National Design Guide?
Population and communities	Ensure good accessibility to social infrastructure	 Improve access to social, commercial, and community facilities, including leisure and recreation opportunities. Promote the development of a range of high quality, accessible community facilities, including specialist services for disabled and older people?
	Maintain and enhance community identity	 Can development effectively integrate within the existing settlement pattern? Enhance the identity of a community or settlement?
	Reduce social deprivation within the borough	 Provide development in the most deprived areas and stimulate regeneration? Stimulate regeneration and secure benefits for the existing community?
	Contribute towards reducing crime and the fear of crime	 Reduce crime and the fear of crime? Provide well-designed public and shared amenity spaces that feel safe for people who live, work and visit the area?
	Increase supply of housing, choice and quality of housing	• Meet the identified needs for the borough?

SA theme	SA objective	Assessment questions (will the option/ proposal help to)	
	and affordable housing within the borough.	• Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community?	
Transport and movement	Ensure LBBD is served with an integrated network of routes, for all modes of transport, with well-considered parking, servicing and utility infrastructure for all users.	 Reduce the need to travel through sustainable patterns of land use and development? Encourage modal shift to more sustainable forms of travel? Enable transport infrastructure improvements? Facilitate working from home and remote working? Provide improvements to and/ or reduce congestion on the existing highway network? 	

2. Plan-making/ SA up to this point

Introduction

2.1 Plan-making has been underway since 2015, with a wide range of evidence produced to inform the development of the draft plan. Prior to this current stage (Regulation 19²), a number of Local Plan and SA documents have been published. **Table 2.1** sets these documents out.

Table 2.1: Key Local Plan/ SA documents published to date

Local Plan Documents	SA Documents
	SA Scoping Report Consultation was undertaken from 23 March to 04 May 2015
Issues and Options Document Public consultation from 14 October 2015 to 16 January 2016	
Draft Local Plan Regulation 18 Consultation version Public consultation from 29 November 2019 to 24 January 2020	Interim SA Report and Non-Technical Summary Public consultation from 29 November 2019 to 24 January 2020 ³
Local Plan Regulation 19 Consultation version Public consultation from 05 October to 29 November 2020	SA Report and Non-Technical Summary Public consultation from 05 October to 29 November 2020 ⁴

What is the key issue for the plan?

- 2.2 Whilst the plan objectives (see chapter 1, above) cover a range of issues, an overarching objective⁵ relates to the identification of land to meet housing and employment needs over the plan period 2019 -2037. Determining an approach to housing and employment growth is the primary means by which the plan seeks to achieve wide ranging objectives. It is the matter at the heart of the plan.
- 2.3 Hence it is considered reasonable⁶ that alternatives appraisal should focus on this matter. Whilst the plan is set to establish policy to address a range of other specific issues, it was recognised as reasonable and proportionate to develop policy without formal alternatives appraisal as they are not likely to result in significant effects.

What about site options?

2.4 Site options - i.e. the pool of sites available, deliverable and potentially suitable for allocation through the plan - were appraised in 2019, 2020 and 2021. The role of site options appraisal within the SA process has primarily been to provide an evidence base to facilitate the development of spatial strategy alternatives.⁷ As such, site options appraisal is not given further explicit attention within this part of the report. Specific sites are discussed as part of the justification for developing alternative spatial strategies, but formal site options appraisal findings are presented only in **Appendix III of the main SA Report**.

⁴ <u>https://www.lbbd.gov.uk/local-plan-review</u>

² The Town and Country Planning (Local Planning) (England) Regulations 2012

³ https://www.lbbd.gov.uk/sites/default/files/attachments/Reg-18-Interim-Sustainability-Appraisal-Report-28-Nov-2019.pdf

⁵ In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what 'reasonably' should be the focus of alternatives appraisal should be made in-light of the plan objectives.

⁶ Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.
⁷ In other words, site options appraisal was undertaken as a means to an end (i.e. development and appraisal of reasonable alternatives), rather than an end in itself. It is worth noting that site options are not 'alternatives' in that they are not mutually exclusive.

Establishing the reasonable alternatives

How much growth?

- 2.5 Barking and Dagenham's Local Plan must be in 'general conformity' with the London Plan. In this context, the current London Plan (2021) is the starting point for the development of potential alternatives for the emerging Local Plan.
- 2.6 A critical issue for the Local Plan and therefore the SA is the level of housing to be accommodated in the Borough. In terms of the level or quantum of growth to be delivered during the Local Plan period (2019 to 2037), Policy H1 in the London Plan (2021) identifies a ten-year housing target (2019 2029) of **19,440** dwellings for Barking and Dagenham. This equates to an annual target of 1,944 dwellings per annum (dpa).
- 2.7 The Government's published Housing Delivery Test 2020 measurement (January 2021) identifies that there has been significant under delivery of housing in the London Borough of Barking & Dagenham (LBBD) over the last three years. As a result, in line with the NPPF, a 20% buffer needs to be added to the housing requirement for the first five years of the Local Plan period.
- 2.8 The London Plan (2021) does not identify a specific housing target beyond 2029. It states that, "If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites." As a result, LBBD has identified a housing target of **19,424** dwellings from 2029 to 2037, based on the 2017 GLA SHLAA Phases 4 and 5.
- 2.9 **Table 2.2** below sets outs the evidence outlined above in relation to the quantum of housing growth.

Source	Quantum of growth
London Plan 2021 identifies ten-year housing target (2019 to 2029) of 19,440 dwellings for Barking & Dagenham. NPPF and Housing Delivery test (20% buffer to the first five-year housing target 2020 to 2025).	19,440 dwellings
2017 GLA SHLAA Phase 4 and 5 (2029 to 2037)	19,424 dwellings
Total for the Local Plan period (2020 to 2037)	38,865 dwellings

Table 2.2: Housing target for LBBD

- 2.10 The total of 38,865 dwellings presents a minimum housing target to be delivered during the plan period in order to ensure that the Local Plan is in conformity with national planning policy and the London Plan (2021).
- 2.11 Alongside the evidence set out above, there is also a need to consider employment land as this will play an important role in the delivery of housing within the borough. Further to this, LBBD's aspirations and ambition to facilitate a transformational change in the Borough's social and economic landscape through intelligent use of its industrial land.
- 2.12 In this context, Policy E4 (Land for industry, logistics and services to support London's economic function) in the London Plan (2021) specifies that London's land and premises for industry, logistics and services fall into three categories:
 - Strategic Industrial Locations (SILs);
 - Locally Significant Industrial Sites (LSIS); and
 - Non-Designated Industrial Sites.

- 2.13 Policy E4 states that the release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of wider infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 (Industrial intensification, co-location and substitution) and supported by Policy E5 (Strategic Industrial Locations (SIL)). *"Any release of industrial land should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure."*
- 2.14 Policy E5 states that SILs should be managed pro-actively through a plan-led process. Boroughs should strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of SSILs where evidence that alternative, more suitable, locations exist. The supporting text identifies the *"Thames Gateway as providing the greatest scope for strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham."*
- 2.15 Policy E7 encourages boroughs to explore opportunities for the intensification industrial activities in order to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. The supporting text states that there *"may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential."*
- 2.16 An Industrial Land Strategy (ILS) (2021) has been prepared to inform the development of the Local Plan and support LBBD's ambitions. The purpose of the ILS was to provide a detailed assessment of the borough's stock of employment land and premises in light of current and future needs and consider how it can best used to accommodate these needs. The ILS was prepared to show the potential approaches that LBBD could use to accommodate future industrial land demand in order to support Local Plan preparation, give direction to future masterplanning exercises in key growth locations and consider development proposals against. The ILS was prepared using a methodology that was agreed with the GLA, ensuring that the information used, and approach taken were both robust and satisfied the tests set out by the London Plan.
- 2.17 As a first step, the ILS (2021) reviewed the existing supply and identified that LBBD currently has 446.55 ha of industrial land divided between 8 clusters, which are comprised of 38 sites. The 8 clusters are set out in **Table 2.3** and presented in **Figure 2.1** on the next page.

Cluster	Designation	Plot size (ha)	Floorspace (sqm)
Castle Green (CG)	SIL	58.7	248,710
Chadwell Heath (CH)	LSIS	30.9	146,418
	SIL	179.6	509,831
Dagenham Dock (DD)	LSIS	22.5	323
	Non-designated	10.7	73,452
	LSIS	5.7	32,039
Dagenham East (DE)	SSA	14.5	0
Gascoigne South and	SIL	11.1	42,396
Kingsbridge (GS-KB)	LSIS	5.83	47,674
Diver Deed (DD)	SIL	83.7	441,641
River Road (RR)	LSIS	2.7	37,840
Wantz Road (WR)	LSIS	15	109,964
Hertford Road (HR)	LSIS	5.35	30,244

Table 2.3: LBBD Industrial Clusters

Figure 5.1: LBBD Industrial Clusters⁸



- 2.18 **Table 2.3** above demonstrates that most industrial sites in LBBD are designated as SIL, which offer a total of 330.6 ha of employment land (circa 75% of all employment land in the borough).
- 2.19 The review of the sites through the ILS identifies an under-supply of modern spaces and that the current stock is, generally, too old, the wrong specification and wrongly sized. The vast majority of existing floorspace is tertiary and/ or secondary rather than modern or prime, which holds back LBBD's employment and prosperity growth.

⁸ LBBD (June 2021) Industrial land Strategy

- 2.20 As part of the baseline review, the ILS also considers the amount of floorspace that would need to be relocated if released for alternative uses, the type of activities likely to be relocated as well as suitable locations for their relocation.
- 2.21 Following the baseline analysis of existing supply, the ILS considered future needs for the borough. It establishes that LBBD could face a requirement for an additional circa 50 ha of new employment land or 203,000 sqm of industrial floorspace. Based on the translation of employment forecast into floorspace and land requirement, the ILS notes that a large share of this future demand will come in the short-term (next 5 years).
- 2.22 Overall, the ILS assessed that all the sites in the study area (38 sites across 8 clusters) have a total capacity to delivery just over 3 million sqm of industrial floorspace. While this is clearly well in excess of the requirements identified above, the ILS notes that the figure does not account for the loss of land being released for alternative uses and the need to relocate the existing floorspace for those areas.
- 2.23 The ILS explores three scenarios for the release and intensification/ co-location of industrial land within the borough. **Table 2.4** provides further details on the scenarios as well as pros and cons identified through the ILS.

Table 2.4 : ILS Scenarios	Table	2.4 :	ILS	Scen	arios
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Scenario	Description	Pros and Cons
1: Regeneration Vision - Full Release	 Full release of industrial land in line with LBBD's aspirations for transformational change. This scenario does not take account of co-location as a replacement for lost industrial space. This would result in the release of around 172.3 ha of industrial land from the following clusters: Castle Green (CG) - the release of 58.7 ha of SIL. Chadwell Heath (CH) - the release of 30.9 ha of LSIS. Dagenham Dock (DD) - the release of 24.7 ha of non-designated industrial land. Dagenham East (DE) - the release of 14.5 ha of non-designated industrial land. Gascoigne South and Kingsbridge (GS-KB) - the release of 5.8 ha of LSIS. River Road (RR) - the release of a total of 32.3 ha, 1.4 ha LSIS and 30.9 ha SIL. Wantz Road (WR) - no release of 5.4 ha of LSIS. 	 Could accommodate a sufficient uplift in capacity to accommodate both displaced capacity and projected future need. Couldn't deliver sufficient headroom in the potential supply and therefore reduces flexibility. The densification of retained sites will be less easy to control as it will rely on landowners bringing forward small sites for infill and extension.
2: Regeneration Vision - Co-location	 The release of industrial land identified for alternative uses as per Scenario 1; however, this scenario includes the potential capacity created through colocation as part of the future supply of space. This would result in the release of around 137.8 ha of industrial land from the following clusters: Castle Green (CG) - the release of 58.7 ha of SIL. Chadwell Heath (CH) - no release of industrial land. Dagenham Dock (DD) - the release of 22.5 ha of non-designated industrial land. Dagenham East (DE) - the release of 14.5 ha of non-designated industrial land. Gascoigne South and Kingsbridge (GS-KB) - the release of 5.8 ha of LSIS. River Road (RR) - the release of a total of 30.9 ha of SIL. 	 potential supply and therefore greater flexibility. Could limit location and typology choices in the market, which may impact economy in the future.

• Wantz Road (WR) - no release of industrial land.

Scenario	Description	Pros and Cons
	 Hertford Road (HR) - the release of 5.4 ha of LSIS. 	
3: Proposed Allocation	 LSIS. The third scenario considers an approach that takes account of LBBD's aspirations but also considers the wider market, delivery and business factors that would influence the successful delivery of a sequenced intensify and release strategy. This would result in the release of around 49.9 ha of industrial land from the following clusters: Castle Green (CG) - the release of 31.1 ha of SIL. Chadwell Heath (CH) - no release of industrial land. Dagenham Dock (DD) - no release of industrial land. Dagenham East (DE) - no release of industrial land. Gascoigne South and Kingsbridge (GS-KB) - the release of 5.8 ha of LSIS. 	 Could provide significant flexibility within the borough and the potential to 'cushion' any unexpected losses of space or failure of individual sites to come forward. Could also mean that the borough is less reliant on the densification of smaller sites to meet future needs Plot ratios would also (potentially) be more in line with industry norms, Through the capacity created virtually all displacement and future demand can be accommodated – without the need for co-location. The level of headroom would place a significant over supply of land and space
 River Road (RR) - the release of 7.6 ha of SIL. Wantz Road (WR) - no release of industrial land. Hertford Road (HR) - the release of 5.4 ha of LSIS. 	into the market, which there is no certainty would be required.	

- 2.24 The ILS identifies Scenario 3 as the preferred option, "combining the retention of some sites which have low potential for alternative uses (such as residential) and opting for colocation on sites we believe suitable for this based on current characteristics of the site, activities in the surrounding areas and future employment activities expected to be accommodated on those sites."
- 2.25 Overall, the ILS recommends the retention of 389.9 ha of industrial land (including land suitable for co-location) out of 446.55 ha of industrial land currently available in LBBD. This would result in the release of circa 50 ha of industrial land.
- 2.26 In terms of housing land supply, LBBD's Housing Land Assessment (HLA) and housing trajectory identify available, suitable and deliverable sites that can potentially deliver 44,051 dwellings during the plan period. Table 2.5 demonstrates how this is broken down.

Sources	Dwellings during plan period (2020 - 2037)	
Strategic Sites ⁹ with planning permission (as at April 2020)	21,418	
Small Sites ¹⁰ with planning permission (as at April 2020)	426	
Windfall sites (less than 10 dwellings)	802	
Sites options without planning permission	21,405	
Total	44,051	

Table 2.5: Housing land supply through the emerging HLA

- 2.27 The HLA and housing trajectory also identify available, suitable and deliverable sites that can potentially deliver 12,235 dwellings post plan period. This is comprised of two strategic sites that will not be fully built out during the plan period:
 - Castle Green (Site ID CF) is designated as SIL and identified as having the potential to deliver 450 dwellings during the plan period and 11,550 dwellings post plan period.

⁹ Sites that can deliver more than 50 or more units in total. These sites have a total site area or remaining developable area (where applicable), of >0.25ha. 10 Sites that can deliver less than 50 units, and those sites where the total site or remaining developable area is <0.25 ha or

less.

- Chadwell Heath Industrial Estate (Site ID CH) is designated as LSIS and identified as having the potential to deliver 3,000 dwellings during the plan period and 685 dwellings post plan period.
- 2.28 The HLA and housing trajectory therefore identify the potential for the delivery of a total of 56,286 dwellings during the plan period and beyond.
- 2.29 The policy context and evidence set out above suggests that the SA process should explore spatial strategy options to deliver 38,865dwellings (minimum housing target to be in conformity with national planning policy and the London Plan) up to 44,051 dwellings during the plan period (which reflect the longer term aspirations of the Council for transformational change and the ILS (2021)).

Where could the growth be located?

- 2.30 As previously stated, LBBD's Housing Land Assessment (HLA) and housing trajectory identify available, suitable and deliverable sites that can potentially deliver growth during the plan period and beyond. A number of these sites are already committed (i.e. have planning permission)
- 2.31 **Table 2.6** below sets out the 46 remaining site options identified through the HLA as not having planning permission but that are nevertheless available, suitable and deliverable during the plan period (and beyond in some cases).

Site ID	Site Name	Indicative capacity	
Barking Town Centre and the River Roding			
СМ	Gascoigne Industrial Area	2,296 dwellings during the plan period	
BB	Tesco Car Park	986 dwellings (excluding the 514 dwellings with existing planning permission) during the plan period	
XC	Harts Lane Estate	1,227 dwellings (excluding the 74 dwellings with existing planning permission) during the plan period	
HA	Wickes (Hertford Road)	899 dwellings during the plan period	
HN	Ripple Road and Methodist Church	252 dwellings during the plan period	
DJ	Clockhouse Avenue	250 dwellings during the plan period	
YM	Phoenix House, 12-14 Wakering Road	188 dwellings during the plan period	
DO	Town Quay	138 dwellings during the plan period	
XD	Hepworth Gardens & Southwold Drive	108 dwellings during the plan period	
YA	IBIS Barking	136 dwellings during the plan period	
YO	Barking Foyer	134 dwellings during the plan period	
ZO	Cambridge House	117 dwellings during the plan period	
HL	Hapag-Lloyd House	75 dwellings during the plan period	
DG	Bamford Road	98 dwellings during the plan period	
НО	14-34 London Road	29 dwellings during the plan period	
WD	Former Victoria Public House, Axe St	26 dwellings during the plan period	
YG	Garages at Kier Hardy Way	23 dwellings during the plan period	
BZ	174-176 Ripple Road	8 dwellings during the plan period	

Table 2.6: Sites without planning permission

Site ID	Site Name	Indicative capacity	
HM	Old Granary	6 dwellings during the plan period	
HZ	Hertford Road Industrial Estate	957 dwellings during the plan period	
	and the Riverside		
CI	Thames Road	1,844 dwellings during the plan period (excluding 156 dwellings with planning permission)	
CF	Castle Green	450 dwellings during and 11,550 dwellings post plan period	
XK	Barking Riverside Gateway Zone	538 dwellings during the plan period	
XQ	Former Volunteer Public House, Alfred's Way	112 dwellings during the plan period	
DY	Chelmer Estate	28 dwellings during the plan period	
Dagenha	m Dock, Beam Park and Stamping	Plant	
XJ	Former Ford Stamping Plant	3,000 dwellings during the plan period	
ZZ	GSR and Gill Sites	431 dwellings during the plan period	
AC	Merrielands Crescent Two	324 dwellings during the plan period	
Chadwel	I Heath and Marks Gate		
СН	Chadwell Heath Industrial Estate	2,939 dwellings (excluding the 61 dwellings with planning permission) during and 685 dwellings post plan period	
WF	Sainsburys 97-131 High Rd	365 dwellings during the plan period	
AS	Padnall Court and Reynolds Court	125 dwellings during the plan period	
Dagenha	m East and Dagenham Village		
XE	Strategic Site ID XE - Ibscott Close Estate	831 dwellings during the plan period	
DM	Strategic Site ID DM - Dagenham Heathway Mall	860 dwellings during the plan period	
HT	Dagenham Heathway Station	178 dwellings during the plan period	
СХ	Strategic Site ID CX - Salisbury Road (Car Park)	50 dwellings during the plan period	
DS	Strategic Site ID DS - Rainham Road South	43 dwellings during the plan period	
WB	Strategic Site ID WB - Durham and Rainham Road South	34 dwellings during the plan period	
ZT	Small Site ID ZT - 58 to 68 Church Street	13 dwellings during the plan period	
Becontre	90		
AD	Dagenham Leisure Park	600 dwellings during the plan period	
SR	Seabrook Road and Shipton Close	84 dwellings during the plan period	
ZN	Brocklebank Lodge	76 dwellings during the plan period	
ZB	Gale Street	31 dwellings during the plan period	
XO	Lodge Avenue	24 dwellings during the plan period	
CV	Land North of Becontree Station	49 dwellings during the plan period	
Becontree Heath and Rush Green			
CW	90 Stour Road	150 dwellings during the plan period	

Site ID	Site Name	Indicative capacity
DZ	Dagenham Labour Hall	13 dwellings during the plan period

- 2.32 Of the 46 site options identified through the HLA as not having planning permission and set out above:
 - None are located within the Green Belt.
 - One (Lodge Avenue ID XO) falls partially within Metropolitan Open Land (MOL) (Mayesbrook Park).
 - Three contain areas designated as Public Open Space. Harts Lane Estate (ID XC), and Castle Green (CF) contain small areas (1.8 and 0.4% of the sites respectively) whereas Land to the West of Scrattons Farm (Site ID XF) is almost entirely designated as Public Open Space.
 - Eighteen fall within Flood Zones 2 and 3, with thirteen of these sites having over 50% of their area falling within Flood Zones 2 and 3.
 - Six (Cambridge House ID ZO, Clockhouse Avenue ID DJ, Old Granary ID HM, Ripple Road ID HN and Town Quay ID DO) fall within the Abbey and Barking Town Centre Conservation Area.
 - One contains a Listed Building (Old Granary ID HM).
 - Seven are either wholly or partially designated as SIL/ LSIS:
 - Chadwell Heath Industrial Estate Site ID CH (LSIS);
 - Castle Green Site ID CF (SIL);
 - Thames Road Site ID CI (SIL);
 - Riverside Gateway Zone Site ID XK (SIL).
 - Gascoigne Industrial Area Site ID CM (LSIS);
 - Hertford Road Industrial Estate Site ID HZ (LSIS); and
 - Wickes (Hertford Road) Site ID HA (LSIS).
 - 41 are well-connected in line with the London Plan, i.e. within 800m of a Major or District Town Centre, 800m of a railway station and/ or have a PTAL rating of 3-6. Please note this includes consideration of proposed new District Centres (Barking Riverside and Merrielands Crescent in the New London Plan and the amalgamation of Merry Fiddlers, Whalebone Lane South and Althorne Way) as well as the new Barking Riverside Station and associated improvements to PTAL ratings. The 5 sites that are not well-connected include; Hepworth Gardens & Southwold Drive (ID XD), Gascoigne Industrial Area (CM), Padnall Court and Reynolds Court (ID AS), Barking Riverside Gateway Zone (ID XK) and Former Volunteer Public House (ID XQ).

What are the reasonable alternatives at this stage?

- 2.33 It is appropriate for the development of reasonable alternatives through the SA process to focus on the site options without planning permission. Amongst these sites there are likely to be choices in terms of delivering the minimum housing requirement and LBBD's aspiration for transformational change. The sites *with* planning permission and windfall should be considered a *constant* as part of any reasonable Borough-wide spatial strategy option, i.e. their future development is considered a given.
- 2.34 Taking the above into account along with the baseline information, policy context provided through the London Plan and Local Plan evidence base, it is considered appropriate that the focus in terms of the identification of reasonable alternatives through the SA process at this stage should focus initially on:

- 2.35 **The amount of designated industrial capacity that can be released/ intensified/ colocated.** LBBD has around 446.3 hectares of strategic industrial land accommodating slightly more than 1.5 million square metres of commercial floorspace, with 70% of this floorspace being located within the Strategic Industrial Locations and 22% within the Locally Significant Industrial Sites. The ILS (2021) identifies an under-supply of modern spaces and that the current stock is, generally, too old, the wrong specification and wrongly sized. The vast majority of existing floorspace is tertiary and/ or secondary rather than modern or prime, which holds back LBBD's employment and prosperity growth.
- 2.36 The amount of industrial land that can be released/ intensified/ co-located during the plan period will have an influence on the:
 - Number of jobs and new homes that can be delivered during the plan period; and
 - Densities of residential development at well-connected brownfield sites. None or a limited release/ intensification/ co-location of industrial land would result in a shortfall in meeting the housing target, which would need to be made up through increased densities at well-connected brownfield sites. The London Plan identifies areas where the Council should seek to intensify uses and release land for residential and mixed-use growth. These 'well-connected' areas include sites within 800m of a Major or District Centre, 800m of a train station and/ or have a PTAL rating of 3-6. It should be noted that proposed new District Centres (Barking Riverside and Merrielands Crescent in the Draft New London Plan as well as the amalgamation of Merry Fiddlers, Whalebone Lane South and Althorne Way) have also been taken into consideration as well as the new Barking Riverside Station and associated improvements to PTAL ratings.
- 2.37 Taking the above into account, three alternative spatial strategy options have been identified at this stage based on the evidence and realistic choices available. It is important to remember that a large proportion of development proposed under each of the options is comprised of committed development (sites with existing planning permission as well as windfall).

Option 1: No further release/ intensification/ co-location of designated industrial land and increased densities at well-connected brownfield sites

- 2.38 This option does not propose the release/ intensification/ co-location of any additional designated industrial land outside of committed development (i.e. that has existing planning permission). Under this option there would be no redevelopment of the Gascoigne Industrial Area (ID CM), Thames Road (ID CI), Chadwell Heath (ID CH), Castle Green (ID CF), Riverside Gateway (ID XK) and Hertford Road Industrial Estate (ID HZ). Only an extremely small proportion of Wickes (Hertford Road) site (ID HA) is designated as LSIS, it is assumed the designated area could be avoided and the site is therefore included under this option.
- 2.39 With the removal of four strategic sites and reduced capacity at two strategic sites the Borough would not be able to meet the minimum housing requirement identified through national planning policy and the London Plan. The shortfall could only be met by increasing densities (approx. 35%) at well-connected brownfield sites. This option would deliver 38,865 dwellings during the plan period (2020 to 2037) and does not include any sites that would deliver growth post plan period. This is the minimum housing target to be in conformity with national planning policy and the London Plan.

Option 2: Significant release of designated industrial land and standard densities across brownfield sites

- 2.40 This option proposes the full release of industrial land and includes the consideration potential capacity created through co-location as part of the future supply of space. It aligns with Scenario 2 in the ILS (2021). This option would result in the release of around 137.8 ha of designated industrial land from the following sites:
 - Castle Green (Site ID CF) the release of 58.7 ha of SIL.
 - Chadwell Heath Industrial Estate Site (Site ID CH) no release but intensification of industrial land and co-location of employment with residential.
 - Gascoigne Industrial Area (Site ID CM) the release of 5.8 ha of LSIS.

- Thames Road Site (Site ID CI) the release of 30.9 ha of SIL and intensification of remaining industrial land and co-location of employment with residential.
- Riverside Gateway Zone (Site ID XK) no release but intensification of industrial land and co-location of employment with residential.
- Hertford Road Industrial Estate (Site ID HZ) the release of 5.4 ha of LSIS.
- 2.41 This option would deliver around 44,051 dwellings during the plan period (2020 to 2037) using a standard density approach for brownfield sites and includes the delivery of a further 12,235 dwellings post plan period (11,550 dwellings at Castle Green ID CF and 685 dwellings at Chadwell Heath ID CH). This option has the potential to deliver circa 2.1 million sqm of industrial space through intensification, densification and co-location. This would provide sufficient floorspace to be provided to meet future needs of circa 1.9 million sqm of floorspace, with a headroom of circa 200,000 sqm.

Option 3: Limited release of designated industrial land and standard densities at well-connected brownfield sites

- 2.42 This option proposes the release of industrial land in line with the recommended approach (Scenario 3) set out in the ILS (2021). This option takes account of LBBD's aspirations but also considers the wider market, delivery and business factors that would influence the successful delivery of a sequenced intensify and release strategy for industrial land. This option would result in the release of around 49.9 ha of designated industrial land from the following sites:
 - Castle Green (Site ID CF) the release of 31.1 ha of SIL.
 - Chadwell Heath Industrial Estate Site (Site ID CH) no release but intensification of industrial land and co-location of employment with residential.
 - Gascoigne Industrial Area (Site ID CM) the release of 5.8 ha of LSIS.
 - Thames Road Site (Site ID CI) the release of 7.6 ha of SIL and intensification of remaining industrial land and co-location of employment with residential.
 - Riverside Gateway Zone (Site ID XK) no release but intensification of industrial land and co-location of employment with residential.
 - Hertford Road Industrial Estate (Site ID HZ) the release of 5.4 ha of LSIS.
- 2.43 This option would deliver around 44,051 dwellings during the plan period (2020 to 2037) using a standard density approach for brownfield sites and includes the delivery of a further 12,235 dwellings post plan period (11,550 dwellings at Castle Green ID CF and 685 dwellings at Chadwell Heath ID CH). It has the potential to deliver circa 2.6 million sqm of industrial space through intensification, densification and co-location but with a reduced displacement of floorspace (circa 270,000 sqm) compared to Option 2. This would provide sufficient floorspace to meet future needs of circa 1.9 million sqm, with a headroom of circa 700,000 sqm.
- 2.44 It should be noted that Scenario 1 in the ILS has not been taken forward for consideration through the SA as an alternative, as it is does not take account of co-location as a replacement for lost industrial space. Scenario 1 couldn't deliver sufficient headroom in the potential supply and therefore reduces flexibility. As a result, it is not considered a reasonable alternative.

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Appraising the reasonable alternatives

- 2.45 Each of the spatial strategy options identified above was subject to a comparative appraisal under each SA theme. A summary of the appraisal findings is presented in **Table 2.7** below.
- 2.46 The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that SA theme compared to an option that is ranked 2.

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SA theme		Option 1	Option 2	Option 3
Land, soil and	Rank	3	1	1
water resources	Significant effect?	Yes - positive	Yes - positive	Yes - positive
Environmental	Rank	2	1	1
quality	Significant effect?	No	Yes - positive	Yes - positive
	Rank	2	1	1
Biodiversity	Significant effect?	No	Uncertain	Uncertain
Landscape and	Rank	2	1	1
townscape	Significant effect?	Uncertain	Yes - positive	Yes - positive
Historic	Rank	2	1	1
environment	Significant effect?	Yes - negative	Uncertain	Uncertain
	Rank	2	1	1
Climate change	Significant effect?	No	Uncertain	Uncertain
Population and	Rank	2	1	1
communities	Significant effect?	Yes - positive	Yes - positive	Yes - positive
Economy and	Rank	2	1	1
employment	Significant effect?	Yes - negative	Yes - positive	Yes - positive
Health and	Rank	2	1	1
wellbeing	Significant effect?	No	Yes - positive	Yes - positive
Transport and	Rank	2	1	1
movement	Significant effect?	Uncertain	Yes - positive	Yes - positive

Table 2.7: Summary appraisal of the spatial strategy alternatives

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Conclusions

Significant positive effects are anticipated for all options in relation to the population and communities and land, soil and water resources themes. These effects are anticipated as a result of the delivery of new homes to

meet identified needs and the associated delivery of community infrastructure, as well as the focus on brownfield/ regeneration opportunities apparent across all the options in areas that are or are predicted to be well-connected. Options 2 and 3 further provide the delivery of new homes and employment more widely across the borough, which is likely to enhance the significance of these effects.

Options 2 and 3 are considered to have a significant positive effect on the economy and employment through the intelligent use of vacant/ underused industrial land to deliver an increased number of jobs during the plan period. Option 1 performs less well compared to the other options as it does not address the issues around an under-supply of modern employment spaces and that the current stock is, generally, too old, the wrong specification and wrongly sized.

While the regeneration of brownfield land proposed under all of the options has the potential for a positive effect on the landscape and townscape, the increased densities proposed under Option 1 and no further release of industrial land, are likely to make significant positive effects more challenging. Increased densities are likely to result in taller buildings and reduce the ability to deliver open/ green space on site. Options 2 and 3 provide a greater opportunity to deliver significant positive effects on the townscape through the regeneration of industrial land.

Option 1 would increase densities at sites that fall within and are in close proximity to designated heritage assets, including the Abbey and Barking Town Centre Conservation Area. The increased densities proposed under Option 1 are considered likely to have a significant negative effect on the historic environment. Option 1 is also less likely to deliver benefits in relation to the historic environment of the borough compared to Options 2 and 3, which proposes standard densities and regeneration of industrial land more widely across the borough.

It is also recognised that Options 2 and 3 will lead to higher levels of development within the floodplain of the River Thames, which is dependent upon existing flood defences to mitigate risks. The overall effects of this strategy remain uncertain at this stage, the benefits of directing less growth in high flood risk areas under Option 1 is recognised; however, this is also considered alongside the potential for regeneration at the Thames Riverside to improve upon existing flood defences, water attenuation and run-off rates and lead to positive effects in this respect.

Options 2 and 3 perform similarly against the SA themes in terms of rank and likely significant effects. There are pros and cons associated with both options and it is often difficult to identify significant differences between them. While Option 2 proposes a greater release of industrial land it is not certain at this stage that this would deliver additional benefits over and above Option 3 in terms of the delivery of housing, community infrastructure, open/ green space and wider employment opportunities. There is also no evidence that there would be substantial differences between the options in terms of likely effects on environmental themes including but not limited to biodiversity, environmental quality and the landscape. Both options propose co-location, but it is considered that there are suitable mitigation measures available to address impacts on human health and reduce the significance of any residual effects. Taken this into account, there is nothing to suggest that the greater level of co-location proposed under Option 3 would be likely to result in a residual effect that is significantly different to Option 2 under any of the SA themes.

Developing the preferred approach

- 2.47 The Council's preferred option is Option 3 (Limited release of industrial land, standard densities at brownfield sites) because it reflects the Council's ambition to be London's growth opportunity by recognising the potential to:
 - Utilise industrial areas more intelligently Managed release of underutilised industrial land through a sequenced intensification and release strategy for industrial land in the Borough. Option 3 has the potential to deliver circa 2.6 million sqm of industrial space through intensification, densification and co-location but with a reduced displacement of floorspace (circa 270,000 sqm) compared to Option 2. This would provide sufficient floorspace to meet future needs of circa 1.9 million sqm, with a headroom of circa 700,000 sqm.
 - **Step-up housing delivery** by significantly increasing the number of new homes, particularly affordable homes to help meet both identified local need and London's strategic need.
 - Unlock growth through infrastructure investment an increase in density in the right locations will ensure that growth is well supported by physical, social and green infrastructure. Providing strategic transport access, connectivity and capacity and improvements of the highway networks must be delivered to attract investment; enabling necessary schools and health services and other green and sustainable infrastructure to be delivered in a timely manner.
- 2.48 The emerging SA findings demonstrate that Option 3 performs similarly to the SA themes in Option 2 and more strongly against the majority of SA themes compared to Option 1. It also takes advantage of opportunities for significant positive effects in relation to the population and communities, economy, landscape and historic environment of the borough through the regeneration of vacant and underused industrial buildings.
- 2.49 While Option 1 would deliver the minimum housing target required, it would not address the issues raised through the LBBD ILS (the current stock is too old, the wrong specification and wrongly sized) and therefore would not deliver the growth aspirations of the Council. Furthermore, this option does not meet the aspirations of the Greater London Authority through taking opportunities to strengthening and intensifying the borough's extensive and underutilised industrial land.
- 2.50 The emerging SA findings demonstrate that the increased housing densities (around 35%) proposed through Option 1 could have negative effects on the townscape and historic environment of the borough, particularly the Abbey and Barking Town Centre Conservation Area, Barking Abbey Scheduled Monument and the listed buildings in the area. It would also be unable to meet the future industrial needs of the borough due to the under-supply of modern spaces and the need to address current stock which is, generally, too old, the wrong specification and wrongly sized.
- 2.51 While Option 2 would deliver the same number of homes and industrial land capacity, it does not consider the wider market, delivery and business factors that would influence the successful delivery of a sequenced intensity and release strategy. Option 3 provides the borough with significant flexibility to 'cushion' any unexpected losses of space or failure of individual sites coming forward. It would also mean that the borough is less reliant on the densification of smaller sites to meet future needs.

3. SA findings at this stage

3.1 Part 2 of the SA Report answers the question - What are the SA findings at this stage? - by presenting an appraisal of the Second Revision Draft Local Plan (hereafter referred to as the 'Draft Local Plan'). Within Chapter 9 of the SA Report appraisal findings are presented under ten sustainability topic headings (see **Table 1.1**), with each narrative structured to consider the spatial strategy, the Draft Local Plan as a whole and cumulative effects. The summary findings of the appraisal are presented in Chapter 10 of the SA Report and are also set out below.

Summary appraisal findings

- 3.2 Overall, the spatial strategy focuses on the regeneration of brownfield land through both intensification and re-use, is considered likely to bring about a number of significant long-term positive effects. The following points are considered the key elements of the strategy that are likely to realise these effects:
 - Brownfield-led development, minimising the use of greenfield land, and avoiding Green Belt and MOL loss, leading to significant positive effects in terms of efficient land use, land remediation and improved soil quality.
 - Townscape renewal, particularly within the Barking Town Centre and Barking Riverside, benefiting townscape character and the historic environment.
 - Strategic-scale development opportunities which, through economies of scale, provide significant opportunities to improve transport and energy infrastructure.
 - An embedded principle for demonstrable biodiversity 'net gain' and wider environmental net gain – cumulatively leading to significant positive effects across the development sites and locations.
 - Significant new housing development to meet and exceed forecasted needs and including a mix of housing sizes, types and tenures to meet identified local needs.
 - Significant employment growth, through the intelligent use of industrial land targeted at the best performing areas in highly accessible locations and supporting a more diversified employment base.
 - Enhanced town centres, with integrated housing supporting their social, cultural, retail and leisure role and improving accessibility for residents/ reducing the need to travel.
 - High-quality design informed by early engagement.
- 3.3 While the Draft Local Plan performs well against the majority of SA objectives, it is recognised that significant levels of development are proposed within areas of high fluvial flood risk (Flood Risk Zone 3). The avoidance of significant negative effects in this respect is wholly dependent upon successful implementation of the policy protections, and innovative responses from developers.
- 3.4 The previous iteration of the SA recommended that the Local Plan embed the recommendations arising from the HRA. These recommendations have now been incorporated into the policy framework. No new recommendations are made at this stage.
- 3.5 **Table 3.1** below sets out a summary of the appraisal findings for the Draft Local Plan 'as a whole' against each SA theme.

Table 3.1: Summary appraisal findings

SA theme	Commentary	Residual significant effect?
Land, soil and water resources	Overall, the spatial strategy which targets large scale regeneration opportunities is likely to deliver significant positive effects in terms of efficient land use, with brownfield land supplies extending beyond the Plan period and the delivery of new open spaces. Strategic regeneration sites are also considered likely to increase the viability of water/ wastewater infrastructure improvements and improve drainage in support of both the WRMP and the Thames Water 5-year Plan. The proposed policy framework, which maximises the potential for new development supporting efficiency measures and integrating with the environment and infrastructure capacities, is considered likely to lead to significant long-term positive effects.	Yes - Positive
Environment al quality (air, soil and water quality)	The regeneration of industrial land promoted through the Draft Local Plan is likely to deliver land remediation to the benefit of soil quality in the Plan area. In terms of water quality, whilst development is proposed within sensitive water environments, the policy provisions outlined in the plan seek to ensure that no negative effects arise. The widespread application of SUDs, as well as biodiversity enhancement opportunities and the provision of new naturalised buffers between development and waterbodies should support improved water quality overall, both chemically and ecologically. Air quality is a significant constraint with the entire borough being a declared AQMA and in response the Draft Local Plan places a strong emphasis on	Yes - Positive
	sustainable connections. The spatial strategy targets areas of highest PTAL, and the policy framework places significant emphasis on improving active travel opportunities and sustainable transport connections. The air quality of the borough has been categorised and development within Air Quality Focus Areas will be particularly scrutinised under this policy framework. As a result of policy mitigation, localised improvements to air quality are anticipated over the Plan period.	
Biodiversity	The Draft Local Plan seeks to protect features, habitats and species that underpin biodiversity in the borough. Alongside this the policy provisions embed the principle for demonstrable biodiversity 'net gain' and wider environmental net gain. Cumulatively across the development sites this is considered to have the potential for significant long-term positive effects.	Yes - Positive
Landscape and townscape	Overall, the spatial strategy seeks significant regeneration on brownfield sites that have good potential to bring about townscape renewal and improvements. It is predicted that there will be long term significant positive effects in line with Draft Local Plan policies relating to high quality design and managing important views, as well as extended and improved green infrastructure, new parks and open spaces. The benefits of the housing land supply extending beyond the plan period for landscape are also recognised, by means of the long-term protection provided for greenfield land in the borough.	Yes - Positive
Historic environment	The spatial strategy seeks significant regeneration on brownfield sites that have good potential to bring about townscape renewal and improvements that are likely to benefit the settings of historic environment assets, both designated and non-designated, and in particular, the Abbey and Barking Town Centre Conservation Area. A significant long-term positive effect is anticipated in line with Draft Local Plan policies relating to high quality design, managing important views and the protection and enhancement of the historic environment. However, there is an element of uncertainty until project level heritage impact/ archaeological assessments have been carried out.	Yes - Positive
Climate change	The policy framework provides a good steer for future-proofing development in borough, and the strategic scale development opportunities have good potential to realise sustainable transport improvements, and energy infrastructure improvements. Despite this, a high level of growth is located within areas of high fluvial flood risk where careful planning, mitigation and innovative design responses will be required. As a result, an uncertain effect is identified at this stage.	Uncertain

SA theme	Commentary	Residual significant effect?
Population and communities	The Draft Local Plan seeks to deliver new housing in excess of the identified needs, as a result significant long-term positive effects are anticipated. The spatial strategy and supporting policy framework seek to improve the connections between housing, employment and social infrastructure which will benefit local communities in the long-term. This is also considered alongside improvements to the natural and built environment which support high-quality living environments.	Yes - Positive
Economy and employment	Whilst industrial land release to housing development has the potential to undermine the economy and employment, the policy provisions seek to ensure no overall net loss in employment space, and instead seek to deliver net gains through intensification and renewal. The policy framework is considered to have significant potential to deliver long-term positive effects, particularly for the local workforce through ensuring a wide range of employment choices, in highly accessible locations and attractive environments.	Yes - Positive
Health and wellbeing	The Draft Local Plan is underpinned by strategic and detailed directions that seek to ensure new development supports the health and wellbeing of residents. The delivery of new housing, employment and social infrastructure, and improved accessibility and active travel opportunities, is considered likely to deliver significant long-term positive effects for resident health and wellbeing. The regeneration of brownfield land also presents opportunities to improve accessibility to open/ green spaces.	Yes - Positive
Transport and movement	The local and strategic road network in the borough is already operating at, or over capacity. Ultimately any new growth will negatively affect road network capacity; however, the strategic regeneration proposed offers the potential to provide the necessary infrastructure enhancements to accommodate future growth in the borough. When considering this alongside the spatial strategy's focus on development in highly accessible locations, and the policy measures to reduce reliance on the private vehicle and improve active travel opportunities in line with the Mayor's targets for sustainable transport use, significant long-term positive effects are anticipated in relation to transportation and movement overall.	Yes - Positive

4. Next steps

Introduction

4.1 The aim of Part 3 of the SA Report is to explain the next steps in the plan-making/ SA process as well as potential monitoring measures.

Next Steps

- 4.2 This NTS and the main SA Report will accompany the Second Revision Regulation 19 Local Plan for public consultation in October until the 28th November 2021. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and SA process.
- 4.3 The representations received along with further evidence base work, including further SA work (if necessary), will inform the submission version of the Local Plan.

Monitoring

4.4 It is anticipated that monitoring will be undertaken as part of the Council's Authority Monitoring Report (AMR). No significant negative effects are anticipated at this stage, which would require extended monitoring arrangements over and above this existing process.