Royal Borough of Greenwich
Local Plan

Site Allocations Preferred Approach

Interim Integrated Impact Assessment (IIA) Report

February 2019
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Introduction

1.1 This document is the Interim Report on the Integrated Impact Assessment (IIA) of the Royal Greenwich Site Allocations Local Plan Preferred Approach document. This document represents the second stage (Stage B) of the IIA for the Site Allocations Local Plan, following on from the draft IIA Scoping Report in 2016 (Stage A). The IIA process is carried out alongside the plan production process, and makes recommendations to enhance potential positive outcomes and minimise negative outcomes.

1.2 The Site Allocations Local Plan provides specific policy for key sites in order to ensure that the vision and objectives of the Local Plan’s strategic policies (as set out in the Core Strategy with Detailed Policies) are implemented. It supports a strategic and proactive approach to development and change, by ensuring that the most suitable sites are brought forward and that the most appropriate combination of uses and scale of development is promoted on each site.

1.3 The Site Allocations Preferred Approach is the second document in the preparation of Royal Greenwich’s Site Allocations Local Plan. This Interim IIA Report is subject to public consultation alongside the Site Allocations Preferred Approach document. We are inviting comments from [day] [month] 2019 to [day] [month] 2019. Responses can be submitted as follows:

- **By email:** planning.policy@royalgreenwich.gov.uk
- **By post:** Royal Borough of Greenwich, Planning Policy Team, 5th Floor, The Woolwich Centre, 35 Wellington Street, Woolwich, London, SE18 6HQ
- **Online survey:** [insert link]

1.4 This document is available to view online, at all of Royal Greenwich’s libraries and through the reception area at The Woolwich Centre, 35 Wellington Street. We will take all views into account and a summary of the comments received will be made public. If you’d like to be kept informed of the process please provide your contact details and to be added to the Planning Policy Consultation Database.
2 What is an Integrated Impact Assessment (IIA)?

2.1 The IIA brings together a number of assessments of the social, environmental and economic impacts of planning under a single framework, incorporating: the statutory requirements of Sustainability Appraisal (SA) and Strategic Environmental Assessments (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). Habitats Regulation Assessment (HRA) is undertaken as a parallel process to the IIA, with findings of the HRA screening integrated into the IIA as appropriate. The IIA approach therefore addresses all of the Royal Borough’s legal duties to carry out comprehensive assessment of the Plan and its proposed policies within one integrated process.

2.2 Integrating the assessment in this way ensures a comprehensive assessment to inform development of plan policies. As many of the issues considered in the assessments overlap in practice, an integrated approach will produce better recommendations and outcomes. The IIA will follow the prescribed structure for the SA process (Figure 1) as the basis of the framework while incorporating the requirements of the Equalities Analysis (EqA) and the Health Impact Assessment (HIA). Overall, the IIA will assess the extent to which the emerging Site Allocation Local Plan, when judged against reasonable alternatives, will help to achieve relevant sustainability (environmental, economic, social), health and equality objectives.

Sustainability Appraisal and Strategic Environmental Assessment

2.3 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a Sustainability Appraisal (SA) of each of the proposals in a Local Plan during its preparation. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’), which implement the requirements of the European Directive 2001/42/EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment.

2.4 SA ensures that potential environmental effects are given full consideration alongside social and economic issues. The SA should include an assessment of the likely significant impacts – economic, social and environmental – of each of the proposals in the Plan. SA is integral to the preparation and development of a Local Plan, and the Royal Borough’s approach to undertaking SA is in accordance with National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

Equalities Impact Assessment

2.5 The Equality Act 2010 includes a public sector duty which requires public organisations and those delivering public functions to show due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act
• Advance equality of opportunity between people who share a protected characteristic and people who do not share it
• Foster good relations between people who share a protected characteristic and people who do not share it.

2.6 An equality impact assessment (EqIA) is a tool for identifying potential impacts (both positive and negative) that policies, services and functions may have on the key protected characteristics covered by the Equality Duty and on Human Rights. Carrying out an EqIA supports decent decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups. The EqIA is built into the IIA objectives and therefore is considered in the assessment of the Site Allocations Local Plan.

Health Impact Assessment

2.7 Health Impact Assessment (HIA) is a systematic approach to predicting the magnitude and significance of the potential health and wellbeing impacts, both positive and negative, of new plans and projects. The approach ensures that decision making at all levels considers the potential impacts of decisions on health and health inequalities. HIA is particularly concerned with the distribution of effects within a population (as different groups are likely to be affected in different ways) and therefore looks at how health and social inequalities might be reduced or widened by a proposed plan or project.

2.8 While HIA is not a statutory requirement of the Local Plan preparation process, the physical environment is shaped by planning decisions which can facilitate or deter a healthy lifestyle, affecting the quality and safety of the environment, encourage or discourage employment and training opportunities, enhance or impair social networks, and nurture or neglect opportunities for a rich community life. An HIA identifies actions that can enhance positive effects on health, reduce or eliminate negative effects, and reduce health and social inequalities that may arise through planning decisions. It considers how and to what extent proposed policies are likely to affect the health of people in Royal Greenwich and recommends changes to improve outcomes.

2.9 The principles and methods of an HIA can be used to assess health consequences as part of another impact assessment such as an SEA or SA. The HIA is built into the IIA objectives and therefore is considered in the assessment of the Site Allocations Local Plan.

Habitats Regulations Assessment (HRA)

2.10 The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – the ‘Habitats Directive’ provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas referred to as Natura 2000 sites.
2.11 Articles 6(3) and 6(4) of the Habitats Directive require an Appropriate Assessment of plans and projects likely to have a significant effect on a European site. The requirement for HRA in the UK is set down in the Conservation (Natural Habitats &c) Regulations, 1994 in England and Wales, amended in 2007 and is consolidated into the Conservation of Habitats and Species Regulations 2010 (SI No. 210/490).

2.12 A full HRA screening analysis was undertaken on the Core Strategy, including considering the effects of the spatial strategy. No European Sites lie wholly or partly within Royal Greenwich. Two European Sites (Epping Forest and Lee Valley) lie partially within 10 kilometres of the Royal Greenwich boundary.

2.13 The screening assessment of the Core Strategy did not identify any likely significant adverse effects on any European Site and it was considered that the Core Strategy would not have an adverse impact on the integrity of the two sites. Therefore, the Appropriate Assessment stage was not required on the Core Strategy. Accordingly, the screening opinion for the Core Strategy is considered sufficient for the Site Allocations Local Plan.

**Consultation on the IIA Scoping Report**

2.14 The methodology used for the IIA process for the Site Allocation Local Plan is based on the five key stages set out for the Sustainability Appraisal (SA) process in planning guidance. The key stages and tasks for the SA process, and their relationship with the Local Plan process, are set out in Figure 1.

2.15 The IIA Scoping Report represented the first stage (Stage A) of the SA process. The purpose of the scoping stage is to identify the scope and level of detail of the information to be included in the sustainability appraisal report.

2.16 The scoping report carried out the following tasks, in accordance with Stage A of the SA Process:

- Identified other relevant plans, policies and programmes that are relevant to the local area and the Site Allocations Local Plan;
- Collated all the relevant baseline data and assessed the environmental, social and economic characteristics of Royal Greenwich;
- Identified sustainability, health and equalities issues that the Site Allocations Local Plan will need to consider and respond to, in order to achieve sustainable development; and
- Provided an integrated impact assessment appraisal framework to facilitate the future assessment and monitoring of the Site Allocations Local Plan with regards to its ability to respond to local issues and achieve sustainable development.

2.17 Consultation was undertaken on the Draft IIA Scoping Report for six weeks in February/March 2016, alongside consultation on the Site Allocations Issues and Options document. A summary of the responses received and the subsequent changes to the final IIA Scoping Report is included in Appendix A3.
2.18 The IIA Scoping Report for the Site Allocations Local Plan built on the sustainability appraisal (SA) material included in the SA Scoping Report for the Greenwich Core Strategy, in order to avoid any duplication of effort (Article 4 of SEA Directive), where necessary updating the information to reflect changes to policies, plans and programmes since the SA of the Core Strategy was undertaken. It therefore reflected a second stage of scoping that contained updated/additional information relevant to the assessment of the Site Allocations Local Plan, including in relation to health and equalities issues as relevant to the integrated approach to appraisal.

Figure 1 The Sustainability Appraisal Process (Planning Practice Guidance, Ref 11-013-20140306)
3 **Interim IIA Report for Site Allocations Preferred Approach**

3.1 This Interim IIA Report reflects the current early stage in the preparation of the Site Allocations Local Plan. It summarises the second stage (Stage B: Developing and refining alternatives and assessing effects) of the SA process. Its purpose is to assess the emerging Site Allocations Local Plan against the objectives established in Stage A (Scoping), to help inform the next iteration of the IIA Report that will appraise the publication version (Regulation 19) of the Site Allocations.

3.2 This report provides commentary on the following tasks, in accordance with Stage B of the SA Process:

- Testing the Site Allocations Local Plan objectives against the sustainability appraisal framework;
- Developing the Site Allocations Local Plan options including reasonable alternatives;
- Evaluating the likely effects of the Site Allocations Local Plan and alternatives;
- Considering ways of mitigating adverse effects and maximising beneficial effects;
- Proposing measures to monitor the significant effects of implementing the Site Allocations Local Plan.

For completeness, Stage A is also summarised in this report.

3.3 Following consultation on the Site Allocations Preferred Approach document, this Interim IIA report will be amended and updated to reflect the comments received. Its recommendations will also be incorporated into the next stage of the preparation of the Site Allocations Local Plan. The IIA Report will be published alongside the publication version (Regulation 19) of the Site Allocations Local Plan, and representations will be sought on the IIA from the consultation bodies and the public.
4 STAGE A: The IIA Framework

Stage A1: Relevant plans, policies, programmes and strategies

4.1 Stage A of the process requires consideration of other plans, policies, programmes and strategies to identify key sustainability, health and equalities objectives established at the international, European, national, regional and local level that are relevant to the Site Allocations Local Plan. In undertaking an IIA the local authority must take into account the relationships to other relevant policies, plans, programmes and sustainability objectives.

4.2 As set out in the paragraph 2.18, the IIA Scoping for the Site Allocations has relied on the SA material included in the SA Scoping Report for the Greenwich Core Strategy, in order to avoid any duplication of effort (Article 4 of SEA Directive), where necessary updating the information to reflect changes to policies, plans and programmes since the SA.

4.3 The plans and programmes reviewed that are relevant to the Site Allocations Local Plan are listed in Figure 2. Appendix A1 organises these plans and policies under common sustainability themes, to indicate how they relate to the achievement of sustainability.

Figure 2 Summary of relevant plans, programmes and policies

<table>
<thead>
<tr>
<th>International Plans and Programmes</th>
</tr>
</thead>
<tbody>
<tr>
<td>European Strategic Environmental Assessment Directive (2001/42/EC)</td>
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<tr>
<td>European Habitats Directive (92/43/EEC)</td>
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<tr>
<td>United Nations Convention (Ramsar) on Wetlands of International Importance (1971)</td>
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<tr>
<td>UNESCO Convention Concerning the Protection of World Cultural and Natural Heritage (World Heritage Convention) (1972)</td>
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<tr>
<td>European Water Framework Directive (2000/60/EC)</td>
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<td>European Air Quality Directive (2008/50/EC)</td>
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<tr>
<td>Doha amendment to the Kyoto Protocol on Climate Change (2012)</td>
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<td>The Future We Want – Rio+20 United Nations Conference on Sustainable Development</td>
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<td>Urban Wastewater Treatment Directive (91/271/EEC)</td>
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<td>European Flood Risk Directive (2207/60/EC)</td>
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<td>EU 7th Environmental Action Plan, January 2014</td>
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<td>EU Sustainable Development Strategy, May 2001</td>
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<td>EU Biodiversity Strategy, 1998</td>
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<td>EU Biodiversity Action Plan, 2006</td>
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<td>Seveso III Directive (Directive 2012/18/EU)</td>
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<tr>
<td>Johannesburg Declaration on Sustainable Development (United Nations 2002)</td>
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</table>
European Landscape Convention
Renewable Energy Directive (2209/31/EU)

**National Plans and Programmes**

Planning Act 2008
Planning and Compulsory Purchase Act 2004
Localism Act, 2011
The Town and Country Planning (Local Planning) Regulations 2012
Housing and Planning Act 2016
National Planning Policy Framework 2012
National Planning Practice Guidance 2014
Securing the Future – United Kingdom Government Sustainable Development Strategy
Urban White Paper 2000
Housing Act 2005
Laying the Foundations: A housing strategy for England 2011
Countryside and Rights of Way
UK Sustainable Development Strategy, Securing the Future, March 2005
Natural Environmental and Rural Communities Act 2006
UK Air Quality Strategy (2007)
Air Quality Standards Regulations (2010)
Flood Risk Regulations, 2009
Climate Change Act, 2008
Energy Act 2011
UK Renewable Energy Strategy, 2009
National Policy Statements EN1 – EN6
Equality Act 2010
Ancient Monuments and Archaeological Areas Act 1979
Listed Building and Conservation Areas Act 1990
Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard
Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8
<table>
<thead>
<tr>
<th>Regional/London Wide Plans and Programmes</th>
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<tbody>
<tr>
<td>London Plan 2015 (Further Alterations London Plan)</td>
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<tr>
<td>Housing Strategy, 2010</td>
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<tr>
<td>Draft Revised London Housing Strategy, 2014</td>
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<td>Housing Supplementary Guidance, 2012</td>
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<tr>
<td>Mayor’s Economic Development Strategy, 2010</td>
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<tr>
<td>London Enterprise Panel’s Jobs and Growth Plan 2013</td>
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<tr>
<td>Land for Industry and Transport SPG 2012</td>
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<tr>
<td>Managing Risks and Increasing Resilience</td>
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<tr>
<td>Mayor’s Shaping Neighbourhoods: Character and Context SPG 2014</td>
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<tr>
<td>Accessible London: Achieving an inclusive environment SPG 2014</td>
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<td>Mayor’s Transport Strategy, 2010</td>
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<td>The Mayor’s Biodiversity Strategy, 2002</td>
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<tr>
<td>Sounder City: The Mayor’s Ambient Noise Strategy, 2004</td>
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<tr>
<td>Cleaning London’s Air - Mayor’s Air Quality Strategy, 2010</td>
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<tr>
<td>Mayor’s Cultural Strategy Cultural Metropolis (2010)</td>
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<td>Mayor’s Cycle Safety Action Plan</td>
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<tr>
<td>Mayor’s River Action Plan, 2013</td>
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<tr>
<td>Mayor’s East and South East London Sub-regional Transport Plan – 2014 update</td>
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<tr>
<td>Managing Risks &amp; Increasing Resilience: The Mayor’s climate change adaptation strategy 2011</td>
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<tr>
<td>Delivering London’s Energy Future: the Mayor’s climate change mitigation and energy strategy 2011</td>
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<tr>
<td>Thames Catchment Flood management Plan, 2009</td>
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<tr>
<td>Securing London’s water future: The Mayor’s water strategy 2011</td>
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<td>Thames Waterway Plan</td>
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<td>Thames River Basin Management Plan 2009-2015</td>
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<td>All London Green Grid SPG 2012</td>
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<td>London Foundations SPG 2012</td>
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<tr>
<td>Thames Estuary 2100 Plan</td>
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<tr>
<td>The Control of Dust and Emissions during Construction and Demolition SPG 2014</td>
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<tr>
<td>Thames Corridor Catchment Abstraction Management Strategy</td>
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<td>Equal life chances for all 2014</td>
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<tr>
<td>Planning for Equality and Diversity in London. Mayor’s SPG (2007)</td>
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<tr>
<td>Thames Estuary 2100 (TE2100 plan)</td>
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<td>Thames River Basin Management Plan (RBMPs) (October 2015)</td>
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<td>Port of London Authority Plan</td>
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<td>Estuary Edges Guidance</td>
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</tbody>
</table>
Green Capital: Green Infrastructure for a Future City (2016)

**Local Plans and Programmes**

Royal Greenwich Core Strategy with Detailed Policies, 2014
Greener Greenwich Supplementary Planning Document, 2014
Planning Obligations Guidance Supplementary Planning Document, 2015
Thamesmead and Abbey Wood SPD, 2009
Kidbrooke Area SPD, 2008
Woolwich town centre Masterplan SPD, 2012
Eltham town centre Masterplan SPD, 2012
Charlton Riverside Masterplan SPD, 2012
Greenwich Peninsula West SPD, 2012
Spray Street SPD, 2015
Conservation Area Character Appraisals and Management Strategies (various dates)
Biodiversity Action Plan, 2010
Royal Greenwich Playing Pitch Strategy, 2015
Royal Greenwich Sports Facilities Strategy, 2015
Air Quality Action Plan 2002
Greenwich Climate Change Strategy, 2011
Joint Strategic Needs Assessment, 2012
Health and Wellbeing Strategy, 2015-2018
Greenwich Pharmaceutical Needs Assessment, 2015-2018
Greenwich Smart City Strategy, 2015
Children and Young Peoples Plan, 2014-2017
Greenwich Cycling Strategy, 2014
Visit Greenwich Business Plan, 2015-2016
Royal Borough of Greenwich Equality Objectives, 2012-2016
Parking Strategy, 2014
Smart Cities Strategy, 2015
Homelessness Strategy, 2014-2019
Anti-Poverty Strategy, 2012
Thames Estuary 2100 briefing for Royal Borough of Greenwich

**Stage A2: Baseline Information**

4.4 Task A2 of the SA process is to collect all the relevant environmental, social and economic baseline information. Baseline information on the current conditions in Royal Greenwich has been sourced from government agency websites, Census data, Office for National Statistics and local datasets. The baseline provides the starting
point for predicting and monitoring effects, helping to identify potential sustainability issues that the IIA Report will address.

4.5 A brief summary of the socio-economic and environmental characteristics of the borough is provided below. A more detailed review of the baseline data is provided in Appendix A2; this will be updated prior to preparation of the next version of the Site Allocations. The baseline information has been collected under a number of subtopics, intended to correlate as closely as possible with those listed in Annex 1 of the SEA Directive:

(a) Biodiversity  
(b) Population  
(c) Human health  
(d) Fauna  
(e) Flora  
(f) Soil  
(g) Water  
(h) Air  
(i) Climatic factors  
(j) Material assets  
(k) Cultural heritage  
(l) Landscape

4.6 There is a great deal of available information and demographic and statistical indicators that could be listed, but as stated in SEA guidance the level of information should be relevant and appropriate to the spatial scale of the plan. Analysis of the baseline data shows that there is a fairly comprehensive data set around social, economic and environmental conditions in the borough.

Socioeconomic characteristics

4.7 Royal Greenwich has experienced significant population growth over the past 15 years, which has changed the socio-economic characteristics of the borough. The 2011 Census put the borough’s population at 255,483, a 19% increase from the previous Census in 2001, which represent the sixth highest growth rate in London. In the five years since the 2011 Census the borough’s population has continued to grow and the population now stands at 273,000, an 8.4% increase.

4.8 The borough’s population is projected to grow by almost 23% over the next 25 years (62,000 additional residents), which will place increased pressure on housing and services. The borough has a higher proportion of younger people than London which has implications for education provision. While the proportion of older people is below the London average, the numbers are rising which will continue to impact the borough’s health services.

4.9 The borough is very diverse with almost 40% of the borough’s population from a Black and Minority Ethnic (BAME) background. The largest minority ethnic groups are Black African (14.5%) and Other Asian (6.6%). The GLA project that over the next 25 years, the BAME population will increase by 11%, and by 2041 half of the borough’s
population will be from a BAME background. The Black African, Other Asian and Chinese populations are projected to see the greatest growth.

4.10 Economic activity in Greenwich is slightly below the London average and Greenwich has a higher unemployment rate than London as a whole. Royal Greenwich is the 78th most deprived local authority on the 2015 Index of Multiple Deprivation, out of the 326 local authorities in England. Royal Greenwich has seen a considerable improvement in terms of its relative deprivation rankings since 2010 (ranked 28th most deprived), and is the most improved London borough in terms of its relative position on the deprivation rank.

4.11 The 2011 Census counted 101,045 households in Royal Greenwich. Forty-three per cent of borough households are owned by the occupants (43%), which is below the London average, while over half (54%) of households in the borough are rented. Royal Greenwich has a significantly higher percentage of social rented properties compared to London, which compensates for the lower levels of private rented accommodation. The average house price in Royal Greenwich is £273k, almost £100k below the London average.

4.12 The percentage of children in Royal Greenwich attaining level 4 or above at key stage 2 was better than the London and England average - maintaining a 3 year trend. However attainment at key stage 4 (GCSE) was below the London and national average and has been in decline over the last three years, in line with the London trend. At key stage 3, Royal Greenwich’s children outperformed London and England in Maths and English.

4.13 Life expectancy in Greenwich is slightly below the national average. Inequalities exist between the poorest and most affluent areas of the borough, with male residents in the most deprived parts of the borough expected to live 4.8 years less than residents of the most affluent area, and female residents expected to live 5.9 years less than those in the most affluent areas.

Environmental characteristics

4.14 The borough has a rich historic environment, both natural and built, including the Maritime Greenwich World Heritage Site, the 22 diverse conservation areas and the three historic gardens and parks. Open space constitutes a third of Royal Greenwich’s total area, but due to the geographical distribution some parts of the borough are still considered be deficient in terms of access to open space.

4.15 Much of the Royal Greenwich waterfront falls within flood zones 2 and 3. Royal Greenwich is fully defended from tidal flooding from the River Thames by the Thames Barrier and raised defences. Despite this a breach to the raised defences together with an extreme tide level, would have significant consequences to Thamesmead, parts of Charlton and Greenwich Peninsula.

4.16 Air quality is an area of particular concern, and the whole of Royal Greenwich has been designated an Air Quality Management Area.
Stage A3: Identifying key sustainability, health and equalities issues

4.17 The sustainability issues set out in Figure 3 were identified during the SA of the Core Strategy. Having reviewed the relevant plans and programmes (see Appendix A1), and identified baseline information (see Section 5 and Appendix A2), it is considered that the main sustainability issues identified during the SA of the Core Strategy remain the main sustainability issues of relevance to the Site Allocations. These issues have been updated in the below table to reflect the current position and to include health and equalities issues.

Figure 3 Sustainability, health and equalities issues

<table>
<thead>
<tr>
<th>Theme</th>
<th>Key Sustainability, Health and Equalities Issues</th>
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<tbody>
<tr>
<td>ENVIRONMENTAL</td>
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<tr>
<td>Energy and Carbon</td>
<td>- Encourage further reduction in CO₂ emissions, particularly those from buildings.</td>
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<td></td>
<td>- Promote energy efficiency measures, including community heating schemes.</td>
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<td></td>
<td>- Promote development of renewable technology. The most promising sources of renewable energy generation are likely to be solar heated hot water, photovoltaic cells, water source heat pumps, and combined heat and power.</td>
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<td>Air Quality</td>
<td>- The whole of the borough has been designated as an Air Quality Management Area for particulate matter and Nitrogen Dioxide, which indicates the seriousness of air pollution in Royal Greenwich.</td>
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<td></td>
<td>- The main sources of atmospheric pollutants are road transport, although there are important industrial sources to the north of the Royal Borough and close to its boundaries.</td>
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<td>Waste and Recycling</td>
<td>- A third of all household waste in the borough is recycled or composted.</td>
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<td></td>
<td>- Increasing population will have an impact on waste generation and management, in both financial and environmental terms.</td>
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<tr>
<td>Flood risk and Water</td>
<td>- Much of the borough's riverfront falls within flood zones 2 and 3. Whilst the borough benefits from existing tidal flood defences, a breach in the raised defences coinciding with an extreme tide level (though very unlikely) would have extreme consequences and cause flooding in parts of Thamesmead, Charlton Riverside and the Peninsula.</td>
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<tr>
<td></td>
<td>- Development should incorporate Sustainable Urban Drainage Systems, and incorporate facilities to reduce water consumption and re-use grey-water.</td>
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<tr>
<td>Biodiversity</td>
<td>- Biodiversity and protected species should be protected and where possible enhanced.</td>
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<td></td>
<td>- Identify opportunities to protect and enhance green corridors.</td>
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</table>
### Open and Green Spaces
- Protection and enhancement of parks and open spaces throughout the borough.
- Improve access to open space and nature for people.

### Historic Environment
- Protect and enhance the Borough’s heritage assets and seek opportunities to address those on the Heritage at Risk register.
- Protect the borough’s conservation areas, buildings, monuments, parks and gardens that play an important role in defining the borough’s character.
- Ensure archaeological sites of importance are preserved. There are 31 areas of High Archaeological Potential within the Borough, the primary areas of potential being located along the river frontage and in the Maritime Greenwich World Heritage Site and vicinity.

### Riverfront & Maritime Environment
- Maximise the use of the river to best serve the local community and tourism, whilst not compromising its usability for transport.
- The river frames some of the Borough’s key historic buildings and is a waterway rich in biodiversity, a transport route, and an archaeological and recreational resource.

### Views & Vistas
- Protect the borough’s views and vistas, a number of which are locally and regionally significant and are an important element in the character of the Borough, from impacts resulting from new development.

### SOCIO-ECONOMIC

#### Population and population growth
- Population growth will place increased pressure on the need for housing, community and social services and facilities.
- Two fifths of the borough’s population is from a BAME background. As Greenwich becomes more diverse, so the borough’s social infrastructure will need to accommodate the differing cultural needs.
- Greenwich has a higher proportion of school-aged people than London as a whole, which places pressure on the borough’s education provision.
- While the proportion of older people in the borough is below the London average, they are an increasing demographic, which will increasingly impact the borough’s health services.
- Successful cultural integration and cross cultural interaction will help to deliver a vibrant community environment and can improve the quality of life for all residents.

#### Housing
- Increased affordable housing for local residents is required to address the increasing cost of housing within the borough and in London as a whole and compensate for Royal Greenwich’s lower than average household incomes.
- Over half of the borough’s households live in rented housing, with a significantly higher percentage of social rented properties available than London as a whole.
- Greenwich has a higher proportion of one person and lone-parent households than London.
- The housing mix should reflect the identified need and demand.
- Future housing growth will likely place increased pressure on other land uses.
- Council stock should meet the Decent Homes standard.
| Deprivation, Poverty and Crime | • Greenwich has seen a significant improvement in relative deprivation rankings since 2010.  
• There remains a wide gap between the boroughs poorest and most affluent neighbourhoods.  
• Some parts of the borough are among the most deprived areas in the country.  
• Poverty has adverse effects on residents' health and well-being.  
• The overall crime rate is below the London average.  
• Ensure development designs out crime |
| Health and Wellbeing | • The increasing numbers of older residents in the borough will place added pressure on health and social care services.  
• Life expectancy in Greenwich is below the national average, and inequalities exist within the borough between the poorest and most affluent areas.  
• A higher proportion of borough residents rate their health as "not good" when compared to the national average and physical activity in the borough is also below the national average.  
• Ability to access public transport services and employment is extremely important.  
• New development must be designed to cater for the disabled.  
• Seek opportunities through development for additional open space. |
| Transport | • North-South public transport connections should be improved.  
• There are limited cross river services.  
• Some areas of the borough have a greater than average reliance on the car as a mode of transport.  
• Planned and potential transport infrastructure improvements will help to deliver more sustainable development.  
• Public transport accessibility for people with mobility concerns.  
• Encouraging walking and cycling permeability through developments. |
| Business and employment | • Provision of jobs for local people within the borough. Unemployment in Greenwich is above the London average.  
• Training and skills development should be promoted to reduce unemployment and enable residents to positively contribute to the employment base.  
• Start-up businesses should be encourage and supported.  
• Existing employment areas should be protected and enhanced.  
• Existing employment uses should be supported |
| Education | • The growth in the under-16 population means there is increasing pressure to provide additional school places.  
• Impact of Royal Greenwich's lower than average adult qualification levels on employment opportunities.  
• Lower than average GSCE results make access to higher education difficult for residents of Royal Greenwich. |
Stage A4: Developing the IIA Framework

4.18 A set of 17 sustainability objectives were developed during the SA of the Core Strategy. As set out in the previous section, the sustainability issues identified following the review of the relevant plans and programmes and the baseline are consistent with the issues identified during the SA of the Core Strategy.

4.19 Therefore, it is appropriate to use the same objectives for the assessment of the Site Allocations Local Plan, with minor updates to ensure that health and equalities issues have been fully integrated into the framework. These objectives describe the outcomes that the Site Allocations should seek to achieve, and will be used to check and refine the policies as the Local Plan develops.

4.20 Following consultation on the draft Scoping Report, a set of prompt questions has been developed for each objective to assist in the assessment of emerging allocations. Where it is considered that the policy will make a noticeable contribution to the achievement of the objective, through a positive response to the prompt questions, a significant positive effect will be recorded. Where it is considered that the policy will materially hinder achievement of the objective, through a negative response to the prompt questions, a significant negative effect will be recorded. Where it is considered that the policy will not have a significant effect on the objective, through a neutral response to the prompt questions, a neutral effect will be recorded.

4.21 Figure 4 below indicates the relationship between SEA issues and the identified IIA objectives for ease of reference.

*Figure 4 Relationship between SEA issues and identified IIA objectives*

<table>
<thead>
<tr>
<th>Key SEA Issues</th>
<th>IIA Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biodiversity</td>
<td>13,14,15,16</td>
</tr>
<tr>
<td>Population</td>
<td>1,2,3,4,5,6,7,8,9,10,11,13</td>
</tr>
<tr>
<td>Human health</td>
<td>1,2,4,5,6,7,8,10,13,16</td>
</tr>
<tr>
<td>Fauna</td>
<td>13,14,15,16</td>
</tr>
<tr>
<td>Flora</td>
<td>13,14,15,16</td>
</tr>
<tr>
<td>Soil</td>
<td>12,15,16</td>
</tr>
<tr>
<td>Water</td>
<td>12,15,16</td>
</tr>
<tr>
<td>Air</td>
<td>1,12,13,14,16</td>
</tr>
<tr>
<td>Climatic factors</td>
<td>8,12,13,14,15,16,17</td>
</tr>
<tr>
<td>Material assets</td>
<td>7,8,10,17</td>
</tr>
<tr>
<td>Cultural heritage</td>
<td>3,4,7,9,11</td>
</tr>
<tr>
<td>Landscape</td>
<td>1,4,9,13,15</td>
</tr>
<tr>
<td>IIA Objective</td>
<td>Prompt Questions</td>
</tr>
<tr>
<td>---------------</td>
<td>------------------</td>
</tr>
</tbody>
</table>
| 1. Create environments that support good health and wellbeing, and reduce health inequalities. | Will the allocation…  
- Create conditions that support the improvement of mental and physical health and wellbeing?  
- Increase use and ease of access to green spaces for all residents, particularly those with mental and physical health concerns?  
- Reduce health inequalities?  
- Reduce the proliferation of activities with negative health externalities?  
- Improve access to a full range of coordinated health and social care services/facilities in all sectors for all residents?  
- Ensure that the built and natural environments promote health and wellbeing, including by facilitating physical activity and active travel and encouraging social interaction?  
- Increase food growing opportunities?  
- Support fully inclusive health, recreation, leisure and sport facilities that meet the needs of the whole community?  
- Reduce fuel poverty?  
- Manage noise issues and their effect on individual health?  
- Improve air quality? |
| 2. Reduce and prevent crime and fear of crime. | Will the allocation…  
- Support an approach to design that reduces opportunities for criminal and anti-social behaviour?  
- Increase access to community services, including youth clubs and community activities?  
- Increase access, and reduce inequality of access, to economic opportunities and further education? |
| 3. Preserve and enhance the significance of areas and buildings designated for their historic and/or archaeological interest and protect their settings. | Will the allocation…  
- Protect sites, features and areas of historical, archaeological and cultural value and their setting in and around Royal Greenwich?  
- Enable the Royal Borough’s heritage and culture to be understood, explored and appreciated as much as possible by as wide a range of people as possible?  
- Protect views of historically important landmarks and buildings valued in local views?  
- Ensure Royal Greenwich’s historic environment contributes to social and cultural life in the borough?  
- Successfully balance access and energy efficiency requirements with the conservation and enhancement of heritage assets?  
- Increase the equality of access to heritage assets? |
<table>
<thead>
<tr>
<th>IIA Objective</th>
<th>Prompt Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. Create places, spaces and buildings that are well-designed, integrate</td>
<td>Will the allocation…</td>
</tr>
<tr>
<td>effectively with one another, respect identified views and vistas, and</td>
<td>• Secure high-quality architecture and urban design that enhances local character and distinctiveness?</td>
</tr>
<tr>
<td>enhance the diversity and distinctiveness of the local character.</td>
<td>• Promote design, scale and density that is sensitive to its location?</td>
</tr>
<tr>
<td></td>
<td>• Ensure consideration of the spaces between the buildings to provide an attractive, functional and sustainable public realm?</td>
</tr>
<tr>
<td></td>
<td>• Result in the creation of robust and adaptable buildings that can respond to change over their life?</td>
</tr>
<tr>
<td></td>
<td>• Make the built environment safer and more inclusive?</td>
</tr>
<tr>
<td></td>
<td>• Preserve and enhance identified views and vistas?</td>
</tr>
<tr>
<td>5. Support the creation of opportunities for rewarding and satisfying</td>
<td>Will the allocation…</td>
</tr>
<tr>
<td>employment.</td>
<td>• Widen opportunities for residents to access employment, particularly those groups experiencing above average unemployment?</td>
</tr>
<tr>
<td></td>
<td>• Tackle barriers to employment by increasing provision of services such as childcare and skills-training?</td>
</tr>
<tr>
<td></td>
<td>• Reduce inequality in the provision of education and skills training?</td>
</tr>
<tr>
<td>6. Improve opportunities for prosperity and economic growth.</td>
<td>Will the allocation…</td>
</tr>
<tr>
<td></td>
<td>• Support a range of businesses of different types and sizes?</td>
</tr>
<tr>
<td></td>
<td>• Provide space in the right locations for different types of businesses to develop, grow and thrive?</td>
</tr>
<tr>
<td></td>
<td>• Support the provision of infrastructure to serve a diverse range of businesses?</td>
</tr>
<tr>
<td></td>
<td>• Promote diverse, vibrant and economically thriving town and local centres that serve the needs and wellbeing of the population?</td>
</tr>
<tr>
<td>7. Increase participation in, and improve access to, education, skills-</td>
<td>Will the allocation…</td>
</tr>
<tr>
<td>based training, and life-long learning.</td>
<td>• Reduce inequality in access to education and skills training?</td>
</tr>
<tr>
<td></td>
<td>• Support the provision of educational facilities in locations with good public transport connectivity?</td>
</tr>
<tr>
<td></td>
<td>• Provide facilities that support life-long learning, such as libraries, community centres and further education colleges?</td>
</tr>
<tr>
<td>8. Ensure everyone has access to decent, appropriate and affordable housing.</td>
<td>Will the allocation…</td>
</tr>
<tr>
<td></td>
<td>• Ensure that housing is of a good standard, including in terms of energy efficiency?</td>
</tr>
<tr>
<td></td>
<td>• Increase the supply of affordable housing to meet the identified need as much as possible?</td>
</tr>
<tr>
<td></td>
<td>• Improve the diversity of housing types, sizes, prices and tenures?</td>
</tr>
<tr>
<td></td>
<td>• Ensure tenures are fully integrated?</td>
</tr>
<tr>
<td></td>
<td>• Encourage development at a high-standard, and at an appropriate density, size and mix?</td>
</tr>
<tr>
<td></td>
<td>• Provide for housing that meets the diverse and changing needs of the population?</td>
</tr>
<tr>
<td>IIA Objective</td>
<td>Prompt Questions</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| 9. Enhance the area as a business and tourist destination.                    | Will the allocation…  
  • Support the provision of tourism-related uses in appropriate locations?  
  • Increase accessibility of tourist attractions within the borough to ensure that they provide equal access?  
  • Increase public transport accessibility to tourism and business centres within the borough?  
  • Encourage a vibrant social environment that attracts visitors to the borough while respecting the needs of residents? |
| 10. Ensure community services and facilities are accessible to everyone.        | Will the allocation…  
  • Improve access to community services and address specific challenges in access for vulnerable groups?  
  • Support the expansion and upgrading of community facilities, particularly in areas of the borough with high levels of deprivation?  
  • Expand access to health services to support the increasing needs of an aging population?  
  • Support the creation of community facilities that reflect and support the diversity of the borough’s multicultural population?  
  • Support the delivery of integrated and accessible early-years services necessary to ensure that vulnerable children have the best start in life? |
| 11. Encourage a sense of place, community identity and belonging.              | Will the allocation…  
  • Promote equity between population groups and those with protected characteristics?  
  • Support the active engagement of the wider community in decisions that affect their area?  
  • Encourage the development of an active and connected, strong and cohesive community?  
  • Secure high-quality architecture and urban design that enhances local character and distinctiveness?  
  • Promote an approach to design that places people at the heart of the design process?  
  • Improve connections with facilities/amenities? |
| 12. Minimise waste, maximise reuse and recycling of waste, and increase landfill diversion. | Will the allocation…  
  • Encourage the use of local, sustainable materials?  
  • Promote the use of renewable sustainable energy sources?  
  • Minimise the use of non-renewable resources?  
  • Ensure the design is appropriate for the lifetime of the development?  
  • Support the circular economy?  
  • Provide opportunities for businesses to benefit from the circular economy?  
  • Support the reduction of the volume of waste produced in Royal Greenwich, including construction and demolition waste, food and household waste? |
IIA Objective | Prompt Questions
--- | ---
Support the “Waste Hierarchy”? | Increase the proportion of waste recycled or composted? | Support the provision of infrastructure to deal with residual waste in the most sustainable way?

13. Reduce the need to travel by delivering more sustainable patterns of urban development that integrate with accessible and sustainable methods of transportation. | Will the allocation…
Improve connectivity within the borough and at the wider London scale? | Encourage a model shift from private vehicles to active and public transport? | Reduce the need to travel by increasing the mix and density of uses within neighbourhoods? | Improve road safety for all, prioritising pedestrians and cyclists? | Improve the accessibility of the borough’s transport network? | Support the provision of infrastructure to support sustainable transport options, such as cycle parking and electric vehicle charging points? | Enhance the capacity of the public transport network?
Improve energy efficiency and reduce carbon emissions associated with buildings and transport? | Promote the use of low and zero carbon energy technologies including expanding or creating decentralised energy networks? | Reduce inequality in access to heating and reduce fuel poverty? | Encourage an approach to design that responds to climate change? | Reduce the impacts of climate change, including flooding and the urban heat island effect? | Encourage design that improves the microclimate? | Reduce greenhouse gas emissions? | Encourage a design approach that includes flood defences where necessary? | Steer development away from the parts of the borough with high flood risk?

14. Address climate change by reducing greenhouse gas emissions; and improve the borough’s ability to adapt to climate change. | Will the allocation…
Increase protection and improve opportunities for biodiversity? | Ensure that development has no harmful effects on biodiversity and that development resulting in net gain in biodiversity is encouraged? | Ensure that development supports the creation and improvement of strategic and connected green infrastructure? | Increase the proportion of waste recycled or composted? | Support the provision of infrastructure to deal with residual waste in the most sustainable way? | Improve connectivity within the borough and at the wider London scale? | Encourage a model shift from private vehicles to active and public transport? | Reduce the need to travel by increasing the mix and density of uses within neighbourhoods? | Improve road safety for all, prioritising pedestrians and cyclists? | Improve the accessibility of the borough’s transport network? | Support the provision of infrastructure to support sustainable transport options, such as cycle parking and electric vehicle charging points? | Enhance the capacity of the public transport network? | Improve energy efficiency and reduce carbon emissions associated with buildings and transport? | Promote the use of low and zero carbon energy technologies including expanding or creating decentralised energy networks? | Reduce inequality in access to heating and reduce fuel poverty? | Encourage an approach to design that responds to climate change? | Reduce the impacts of climate change, including flooding and the urban heat island effect? | Encourage design that improves the microclimate? | Reduce greenhouse gas emissions? | Encourage a design approach that includes flood defences where necessary? | Steer development away from the parts of the borough with high flood risk?

15. Protect, restore and enhance biodiversity, landscapes and the open space network, improving public access where appropriate. | Will the allocation…
Increase protection and improve opportunities for biodiversity? | Ensure that development has no harmful effects on biodiversity and that development resulting in net gain in biodiversity is encouraged? | Ensure that development supports the creation and improvement of strategic and connected green infrastructure?
<table>
<thead>
<tr>
<th>IIA Objective</th>
<th>Prompt Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Ensure that development does not increase flood risk?</td>
</tr>
<tr>
<td></td>
<td>• Protect existing trees and increase tree planting?</td>
</tr>
<tr>
<td></td>
<td>• Increase the amount of biodiverse rooftops and soft landscaping, and encourage the creation of green walls?</td>
</tr>
<tr>
<td></td>
<td>• Support the protection of the priority species identified in the Greenwich BAP?</td>
</tr>
<tr>
<td></td>
<td>• Increase access to nature where appropriate?</td>
</tr>
<tr>
<td></td>
<td>• Develop or enhance green corridors and routes between larger green spaces?</td>
</tr>
<tr>
<td></td>
<td>• Maximise opportunities for engagement with wildlife, including environmental education?</td>
</tr>
<tr>
<td></td>
<td>• Support the positive management of green infrastructure in a way that supports biodiversity?</td>
</tr>
<tr>
<td></td>
<td>• Improve access to, and the connectivity of, the Green Chain?</td>
</tr>
</tbody>
</table>

16. Seek to improve air quality and protect natural resources such as soil, land and ecosystems.  
Will the allocation…  
• Minimise air, water, and soil pollution and their negative impacts on human health?  
• Support the improvement in air quality in line with national and international standards?  
• Support the sustainable use of water resources?  
• Prevent soil pollution and restore contaminated land?  
• Protection of natural resources, including water?  
• Ensure that development is supported by the necessary sewerage and water infrastructure?

17. Reduce and Manage Flood Risk  
Will the allocation…  
• Steer development away from areas of the borough with the highest flood risk?  
• Ensure that developments in areas of high flood risk include mitigation measures to address surface and fluvial flooding?  
• Ensure that sites in areas of high tidal flood risk include provision for the creation or improvement of flood defences?  
• Ensure that no development prejudices the Environment Agency’s ability to improve flood defences in line with its strategic plans?
4.21 A compatibility assessment of the IIA objectives has been undertaken to better understand how the objectives integrate within one another and identify any potential conflict areas that may exist. The compatibility assessment highlights potential incompatibilities between objectives in order to identify areas where conflicts might occur between these objectives within the Sustainability Appraisal.

4.22 The compatibility matrix highlights several potential conflicts, and the following commentary considers how these could be mitigated going forward.

4.23 Objectives 6 and 3: Improving opportunities for prosperity and economic growth has the potential to lead to increased pressure for development of heritage assets or within their settings. Policies can help to mitigate this potential conflict by ensuring that the impact of development is taken into account so that heritage assets can be conserved and enhanced.

4.24 Objectives 4 and 12: The inclusion of facilities to accommodate waste and recycling within new developments has the potential to detract from the aesthetic quality of the buildings and their engagement with the public realm, particularly in relation to the location of bin stores. Policies can ensure that the detailed design of developments incorporates facilities for waste and recycling in a way that is sensitive to the overall design of the scheme and does not detract from the quality of the public realm.

4.25 Objectives 4 and 15: The development of new buildings and neighbourhoods could result in a reduction or degradation in the quality of open space. Policies can help ensure that new developments reprovide any open space and enhance biodiversity through the provision of soft landscaping and biodiverse roofs.

4.26 Objectives 4 and 16: New development has the potential to result in increased air pollution and the degradation of natural resources such as water and soil. Policies can
mitigate this impact by ensuring that new development does not occur in areas where it is likely to have a significant negative impact on natural resources. It can also ensure that new development mitigates the impacts to natural resources by remediating soil and ensuring that it does not result in increased emissions.

4.27 Objectives 6 and 12: Growth in the local economy is likely to result in an increase in waste and has the potential to reduce landfill diversion if not managed appropriately. Policies can ensure that new businesses divert as much waste from landfills as possible by ensuring that they include suitable facilities for recycling and encouraging them to use reuse materials and use recycled materials.

4.28 Objectives 6 and 14: A growing economy has the potential to increase greenhouse gas emissions through the construction of new buildings, more intensive use of older, energy inefficient buildings, and increased vehicle movements to support new businesses. Policies can ensure that new construction minimises greenhouse gas emissions through restrictions on the type of equipment that can be used. Policies can also ensure that businesses have access to appropriate and energy efficient buildings by allocating land for new commercial and industrial uses. Finally, policies can mitigate the impact of economic expansion on vehicle movements by ensuring that new businesses are located in areas with good public transport connectivity and encouraging and supporting active transport.

4.29 Objectives 6 and 15: The objective of growing the economy could undermine the protection, restoration and enhancement of biodiversity and open spaces. Expanding businesses might build on previously open land and the types of work carried out by the businesses could make habitats unsuitable for certain species. Policies can ensure that open space that has high habitat value is protected from development. Policies can also ensure that new development includes measures to mitigate its impact on habitats and that it reprovides any open space and habitats that are lost.

4.30 Objectives 6 and 16: Growth in certain sectors of the economy, particularly heavy industry, have the potential to contaminate or overuse natural resources and increase all forms of pollution. Policies can ensure that these impacts are mitigated by filters and systems within the building and that industries that could have a detrimental impact on natural resources are located where there is no risk of contaminating the soil, water or other natural resources.

4.31 Objectives 8 and 12: The need to increase the provision of housing within the borough could result in an increase in the volume of waste, both through the construction process and through the resultant population increase. Policies governing the management of waste during construction can ensure that as much of the waste as possible is reused on site and that all other waste is managed in a way that mitigates the negative impacts. Policies supporting the provision of suitable recycling facilities can mitigate the impact on waste resulting from an increase in the number of residents.

4.32 Objectives 8 and 14: Increased construction of new housing has the potential to increase the emissions of greenhouse gases through the construction process, from the occupation of the building itself and through transportation by the residents.
Polices can reduce and mitigate the emissions from construction by mandating the use of low-emissions equipment. Polices can also ensure that new houses are constructed to be highly energy efficient, reducing emissions from heating and cooling. Finally, policies governing the location of new development can ensure that higher density housing is located in areas of high public transport accessibility and that all housing is developed to incorporate infrastructure for active transport.

4.33 Objectives 8 and 15: New residential development has the potential to reduce open space, and negatively impact biodiversity. If housing is developed on existing open space, it can damage habitats thereby reducing biodiversity. Policies can ensure that new development only occurs in areas where it will not result in a reduction in the amount of open space and that it includes soft landscaping that enhances biodiversity by providing for improved habitats.

4.34 Objectives 8 and 16: The development of new housing also has the potential to cause a detriment to air quality and natural resources. Development in inappropriate locations can damage sensitive ecosystems and expose residents to poor air quality. Policies governing the location of new development can ensure that it does not damage existing ecosystems and those governing the detailed design of new housing can ensure that poor air quality is mitigated. The use of natural resources can also be limited by policies that enforce water and energy efficiency.

Stage A5: Consulting relevant authorities on the scope of the IIA

4.35 In accordance with Regulation 12(5) of the SEA Regulations, the draft IIA Scoping Report underwent public consultation for a five week period from the 23rd February to the 29th March 2016. The statutory SEA bodies (Environment Agency, Historic England and Natural England) were directly consulted. Because the IIA has a broader scope than environmental issues, as well as consulting with the statutory bodies the document was also made publicly available on the Royal Greenwich website alongside the Site Allocations Local Plan Issues and Options Paper to invite wider feedback.

4.36 In seeking comments, consultees were asked to consider the following questions:

Q1. Are there any plans, policies and programmes that have not been included in Section 5 and Appendix A1, which are relevant to the sustainability appraisal of the Site Allocations Local Plan?

Q2. Are there any sources of baseline data in Section 6 and Appendix A2, which have been omitted and should be considered as part of the sustainability appraisal of the Site Allocations Local Plan?

Q3. Do any of the sustainability issues in Section 7 need to be added to or amended? If so please state why.

Q4. Do any of the sustainability objectives in Section 8 need to be added to or amended? If so please state why.

4.37 A total of 4 responses were received. A summary of the responses and how the Scoping Report has been updated to take account of the comments received on the draft Report is included at Appendix A3.
5 STAGE B: Developing and refining alternatives and assessing effects

5.1 At this stage in plan preparation, a broad assessment has been carried out in line with the IIA Framework of the 17 objectives and their prompt questions (refer to Figure 5). For each of the proposed allocations in the Preferred Approach, the interim appraisals consist of a series of assessment matrices that score against each objective and provide associated sustainability, health and equality commentary.

Stage B1: Testing the Local Plan objectives against the sustainability appraisal framework

5.2 The purpose of the Site Allocations Local Plan is to facilitate the delivery of the vision and strategic objectives set out in the Core Strategy. The objectives of the Core Strategy, including options for the spatial distribution of development in Royal Greenwich, were comprehensively appraised as part of the SA of the Core Strategy with Detailed Policies. It is not intended to repeat this element of SA as part of the IIA of the Site Allocations. This approach is consistent with Government advice that SA should be proportionate and not repeat policy assessment that has been undertaken previously. Additionally, the outcome of the SA of the objectives/ spatial strategy of the Core Strategy has been used to inform the requirements of the allocations within the Preferred Approach document to ensure growth is delivered in a sustainable way.

Stage B2: Developing options including reasonable alternatives

5.3 The SEA directive requires the environmental report to consider ‘reasonable alternatives taking into account the objectives and geographical scale of the plan or programme’ and give ‘an outline of the reasons for selecting the alternatives dealt with’ (Article 5.1 and Annex I (h)). The aim of developing and appraising different options is to compare the sustainability impacts of alternative ways of addressing and achieving the same objectives. The options should be sufficiently distinct to highlight the different sustainability implications of each in order to allow for meaningful comparisons.

5.4 The alternatives that have been assessed in this Interim IIA are:

- not to allocate the site; and
- the site allocation as proposed in the preferred approach document.

The alternative to not allocate represents a reactive approach; albeit one relying on the existing Local Plan, including the Core Strategy and the London Plan, which have been subject to SAs and found to have a positive impact on sustainability objectives. The preferred approach allocations have been based on the objectives of the Core Strategy and include site-specific measures that make them sufficiently distinct from the reactive alternative.

5.5 The alternatives identified above were selected because they are both realistic and deliverable. A ‘do nothing’ alternative was considered that did not take into account the policies of the Local Plan; however, this alternative was not carried forward because such an approach was not considered reasonable as it is not realistic. For
example, it would not be reasonable or realistic to consider sites within the IIA for uses that are counter to current Local Plan policy designations which are not proposed to be altered within the Site Allocations document.

5.6 It should be noted that both the site allocation and the reactive approach are based on the policies of the Local Plan - in the absence of an allocation, proposals would still be required to comply with the policies in the Core Strategy which has been found to have a positive impact on sustainability objectives. As such, the magnitude of difference between the alternatives is relatively low. This has been taken into account when assessing the significance of the effects of the proposed allocations against the baseline alternative of no allocation.

**Stages B3 and B4: Evaluating likely effects, consideration of mitigation and maximisation of benefits**

5.7 The purpose of Stage B3 (evaluate the likely effects of the Local Plan and alternatives) is to predict the social, environmental, economic, health and equality effects of the proposed Local Plan, as well as the sustainability, health and equality implications of the policies in general. The SEA Directive requires that the environmental report provides information on the likely significant effects, including secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects on the environment.

5.8 The purpose of Stage B4 (consider ways of mitigating adverse effects and maximising beneficial effects) is to set out the measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the Site Allocations. Mitigation measures also include proactive avoidance of adverse effects and measures to enhance positive effects.

*Methodology for Stages B3 and B4*  
5.9 The analysis for Stages B3 and B4 has been carried out in a matrix format (see Section 14) and includes considerations about possible long-term and short-term, and some cumulative, effects in line with guidance. Stages B3 and B4 have been combined in the matrices in order to highlight how the measures proposed in Stage B4 have been informed and drawn from the assessment of effects in Stage B3.

5.10 A qualitative approach to the assessment of impacts has been adopted in line with current practice, and the scale shown in Figure 7 has been used to demonstrate the level and quality of the effects.

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**Figure 7 Options Appraisal Matrices Key**

<table>
<thead>
<tr>
<th>Major Positive</th>
<th>Minor Positive</th>
<th>Neutral</th>
<th>Minor Negative</th>
<th>Major Negative</th>
<th>Uncertain</th>
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</tbody>
</table>
5.11 Impacts have been assessed as follows:

- major positive are likely to have a long-term, borough- or London-wide positive impact
- minor positive are likely to have a short-term and/or localised positive impact
- neutral are unlikely to have any significant impact relative to the baseline alternative
- minor negative are likely to have a short-term and/or localised negative impact
- major negative are likely to have a long-term, borough- or London-wide negative impact
- uncertain is where there is an uncertain relationship to the objective of there is insufficient information at this stage for an appraisal to be made

5.12 The IIA process provides a useful tool in identifying issues and suggesting possible forms of mitigation. It tests the performance and robustness of policies against the Royal Borough’s sustainability objectives. Mitigation measures can take a wide range of forms:

- Changes to options, including bringing forward new options
- Adding or deleting options
- Refining options in order to improve the likelihood of beneficial effects and to minimise adverse impacts
- Technical measures to be applied during the implementation stage

5.13 This interim report represents an assessment of the Preferred Approach (Regulation 18) stage of the Site Allocations Local Plan at an early stage of preparation. Therefore, it identifies possible issues to be addressed by the Plan as the next stage (publication version, Regulation 19) to assist with the development of the site allocations. Where feasible, the recommended measures will be included in the next draft of the Site Allocations Local Plan.

Stage B5: Monitoring significant effects

5.14 The SEA directive requires that the Environmental Report (in this case the IIA) include details of the proposed monitoring process. It is essential that the performance of the Local Plan is regularly monitored to ensure that it is meeting its objectives and that any negative impacts are minimised/eliminated. This monitoring will also be key to ensuring that the Local Plan remains current and relevant. Revisions to the Local may also be necessary in light of changes in legislation.

5.15 In terms of the monitoring itself, many of the indicators identified for baseline data will be particularly useful. These indicators will allow determination of the accuracy of the IIA predictions of effects outlined in this report, and to determine if the Local Plan is contributing to the achievement of the IIA objectives. Monitoring of the Site Allocations Local Plan performance against the IIA objectives will likely take place as part of the AMRs.
Limitations of the IIA process

5.16 While the process scrutinises comprehensively, many issues are largely dependent upon implementation, and to some extent upon the policies from other development plan documents. There are some uncertainties and limitations that exist in the IIA process, which are summarised below:

- In a number of cases, indicators have been identified despite there being no baseline data currently available with which to establish trends or measure effects. It was not always possible to predict effects on the basis of qualitative data.

- There is a risk that officers may make their own assumptions about the possible effects arising from a particular option. However, consultation on the IIA Report is seen as adding value in allowing professionals and interested stakeholders to review the effects identified.

- Difficulties have been identified in respect of predicting the impact of the DPD in the long term, which has further complicated the process of accurately appraising the sustainability of the proposals.

- Difficulties associated with and distinguishing between and separating out the influence of the Local Plan from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time, possibly because of various factors beyond the control of the Local Plan, the Local Plan itself may still have a positive influence.
6 Interim Integrated Impact Assessment

Charlton Riverside

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<th>CR1 Angerstein Triangle</th>
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**Sustainability Commentary**

The allocation includes provision for B1 workspace to support SMEs, which would support the economic sustainability of the borough. Improvements to pedestrian and cycling routes and the connection to the railway and bus.

**Health Commentary**

The mitigation measures adjacent to the A102 will improve air quality to the surrounding neighbourhoods and reduce the impact of noise pollution. The improvement of walking and cycling routes will enhance opportunities for active health.

**Equality Commentary**

The allocation includes B1 workspace, which will enhance equality of access to employment opportunities and to workspace for SMEs. Improvements to the surrounding pedestrian and cycling routes will improve equality of access and
routes will encourage the use of sustainable transport. Enhancements to the adjacent SINC will support ecological sustainability.

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**Sustainability Commentary**
The allocation will deliver a significant quantum of new flexible workspace, which will have a significant, long-term positive impact on the economic sustainability of the borough. The site is focused around the safeguarded route of the future BRT, which will significantly enhance public transport access to the area. This will substantially improve equality of access to

**Health Commentary**
The allocation includes the potential for formal sports and recreation facilities to be included as part of the community uses. It also recommends the inclusion of a new health centre to serve the

**Equality Commentary**
This includes an emphasis on public access and transportation options.
The allocation includes the safeguarding of a route for a significant new element of public transport: a bus rapid transit (BRT) service connecting Woolwich to the Greenwich Peninsula. This will have a significant positive impact on the sustainability of the borough by reducing automobile use. The inclusion of a new local park, green roofs and walls, and planted buffers between the site and the adjacent industrial areas and safeguarded wharf will all contribute to the biodiversity of the borough. Improving the tidal flood defences and maintaining the 16m buffer in line with the Environment Agency’s TE2100 plan will all support the borough’s and London’s ability to adapt to climate change.

New community. It also includes less formal measures, for example improvements to the Thames Path and the inclusion of a new local park, which will enhance opportunities for recreation and generally support improvements in health. The proposed buffer planting between the site and the adjacent industrial sites and safeguarded wharf will also ensure support the health of future residents and workers.

Employment on the site relative to the baseline scenario. Further, improvements to the walking and cycling environment will improve equality of access into and around the site by improving safety and security for pedestrians and cyclists. The inclusion of new community facilities and a school will also improve equality of access to these services for the small number of existing residents and the enhanced public transport service will make these facilities accessible more widely across the northern part of Royal Greenwich. The allocation could be expanded to include provision of a skills academy to provide training in relation to the businesses and uses within the area.

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<td>The allocation is focused on the delivery of affordable, flexible workspace that brings the historic Siemens buildings back into full use. As such, it supports the economic sustainability of the borough as a whole. The allocation recommends that the workspace be incorporated into a hub of creative uses, building on the present uses in the area. This would support the diversification of the Royal Borough’s economy and dovetail with the creation of the Creative Quarter in Woolwich. The reintroduction of workspace use into the historic buildings will support their long-term maintenance, maintaining the historic character of the area. The allocation also proposes a new public open space and improved connections to the Thames Path and the existing surrounding open spaces. These measures will enhance public access to green space and reinforce the biodiversity of the area.</td>
<td>Improving walking and cycling routes to and through the site will encourage recreation, as will the introduction of new public open space and improving links to existing open space. While the allocation does not include health facilities, it is adjacent to Charlton Riverside Central, which will include community facilities, potentially including health, sport and recreation facilities.</td>
<td>The delivery of a creative workspace hub on this site will have a significant positive impact on both access to employment and access to opportunities for expansion for SMEs. It will benefit from both the future BRT service and from improved walking and cycling links to the surrounding areas. Improvements to the Thames Path and the walking and cycling routes around the site will improve equality of access to recreation and to facilities on and around the site.</td>
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## Eltham

### EI Mecca Bingo

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### Sustainability Commentary

The allocation is focused on ensuring that development responds to the existing character of the area and maintains the openness of the adjacent MOL and school playing fields. It could include measures to improve greening on the site and integrate the development of the site into the habitats and biodiversity of the MOL.

### Health Commentary

Though not introducing any health facilities on-site, the allocation seeks to increase residential density in an area with good walkability and adjacent to public recreation grounds.

### Equality Commentary

The change of use of the site from a bingo hall to residential could have an impact on local residents' ability to access social spaces. The existing use is also an employment use and a conversion to residential use could reduce equality of access to employment. The allocation would increase overlooking onto both Eltham Hill and onto...
Kingsground, where there are currently blank facades. This could reduce fear of crime, increasing access to the adjacent recreation ground and to nearby services and amenities.

### E2 Orangery Lane

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### Sustainability Commentary

The allocation delivers public realm improvements, and is car-free, supporting a reduction in car journeys. It also supports the economic sustainability of Eltham Town Centre by

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<td>Public realm improvements and increased permeability would encourage walking, and car-free development supports active transport. Inclusion of public open space could increase</td>
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introducing workspace for SMEs. It could include more specific measures to address resource-use and biodiversity.

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**Sustainability Commentary**
The reprovision of the existing B1 workspace would support objectives around economic sustainability. The allocation also includes requirements for planting to support biodiversity and expects development to respond to the

**Health Commentary**
The allocation does not include any health facilities on-site, but seeks to improve pedestrian connectivity and increase the density of housing in an area with good walkability.

**Equality Commentary**
The allocation includes enhanced routes through the site, which would improve equality of access through the area. The reprovided workspace has the potential to improve equality of access to employment and to facilities for SMEs.
existing character of the area, enhancing the sense of place.
## Greenwich Peninsula

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### Sustainability Commentary

The allocation includes significant measures to improve the character and appearance of the area and to reinforce its connection to the river. The inclusion of a significant quantum of employment floorspace would support the economic sustainability of the borough. The allocation also addresses flood risk, requiring development to include measures to support the Environment.

### Health Commentary

Improvements to the Thames Path will encourage active transport and recreation. The allocation also includes the provision of playspace for future residents. Mitigation measures have also been included to ensure that future residents are not impacted by the adjacent industrial sites and busy roads.

### Equality Commentary

The increase in workspace would increase opportunities for SMEs to work cooperatively with the existing industries and to expand. Improvements to the Thames Path and the introduction of active uses and overlooking would enhance the equality of access to recreation.
Agency's TE2100 plan. The allocation also supports the remediation of contaminated land across Greenwich Peninsula where there is a high level of soil contamination.

### GP2 Morden Wharf

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### Sustainability Commentary

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<th>The allocation includes significant measures to improve the character and appearance of the area and to reinforce its connection to the river. The inclusion of a significant quantum of employment</th>
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<td>Improvements to the Thames Path will encourage active transport and recreation. The allocation also includes the provision of playspace for future residents. Mitigation measures have also been</td>
<td>The increase in workspace would increase opportunities for SMEs to work cooperatively with the existing industries and to expand. Improvements to the Thames Path and the</td>
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floorspace would support the economic sustainability of the borough. The allocation also addresses flood risk, requiring development to include measures to support the Environment Agency's TE2100 plan. The allocation also supports the remediation of contaminated land across Greenwich Peninsula where there is a high level of soil contamination.

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Site Allocations Preferred Approach Interim IIA Report
The provision of a new neighbourhood and the specific design and layout included in the allocation will support the sense of place and create an environment that responds well to its surroundings and creates a human scale. The provision of a public green space supports biodiversity and ecosystem enhancement. The inclusion of a new public green space and new pedestrian and cycle routes through the site will enhance opportunities for recreation and active transportation. The allocation also includes extensive air and noise pollution mitigation measures. Extensive workspace is provided as part of the allocation enhancing access to employment and space for SMEs. The site is currently very car-oriented, the allocation would improve access to the various facilities and opportunities of the peninsula for those without a car and especially for pedestrians and cyclists.

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**Sustainability Commentary** | **Health Commentary** | **Equality Commentary**
The allocation seeks to create a large, mixed-use neighbourhood, with a focus on employment related to design. It would significantly support the economic sustainability of the borough. It would also improve the character of the area, supporting the social and environmental sustainability. By supporting the Environment Agency’s TE2100 Plan, the allocation also reduces flood risk and supports the borough’s adaptation to climate change.

The allocation includes community facilities, recommending a GP’s surgery, which would serve the new neighbourhood. It also includes recreation spaces that would support healthy lifestyles.

The allocation would improve access to employment by developing employment uses in an area of high public transport accessibility. It also improves physical access in the area and to the tube station.

### GPS Phases 3, 4 and 5 Greenwich Millennium Village

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<td>The allocation includes measures related to the enhancement of biodiversity in relation to, and building on, the Ecology Park. These measures also support attenuation of flood water. The allocation improves the aesthetic character of the area and enhances the public realm.</td>
<td>Improvements to the public realm and the creation of new routes through the site would support active transport. The allocation also improves connections to the Ecology Park and includes greening more widely, which would have a positive effect on the health of future residents and visitors. Access to formal health facilities could be challenging given the location of the site.</td>
<td>Improvements to the public realm will make the ecology park and the site more broadly more accessible to those with mobility impairments. The inclusion of employment space also expands opportunities for residents to access employment. The isolated nature of the site could exacerbate inequalities in access to services.</td>
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Greenwich Creekside

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<td>The allocation seeks to enhance the economic sustainability of the borough by retaining and intensifying the industrial uses along Deptford Creek. It also includes the provision of flood control infrastructure. The scale of the site and the need to provide employment uses mean that larger-scale ecological improvement measures would not be feasible. The inclusion of a</td>
<td>The introduction of public access to the Creekside could encourage recreation and active transport, but the scale of the site and the inclusion of the B1 workspace makes the introduction of additional health facilities challenging. Intensifying housing and employment uses in an area with good walkability supports active transport more broadly, and reduces</td>
<td>The retention and enhancement of the existing industrial workspace supports equality of access to employment and to entrepreneurial opportunities, particularly on this site, which has a high level of public transport accessibility.</td>
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<td>significant quantum of B1 workspace would support the economic sustainability of the area and retain its character as a cluster of light industrial uses.</td>
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Kidbrooke

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**Sustainability Commentary**

The allocation includes measures to support environmental sustainability and to enhance biodiversity. It also includes measures to address surface water drainage. The nature and location of the site mean that most non-residential uses would be inappropriate, limiting the site’s ability to address economic sustainability objectives.

**Health Commentary**

The allocation includes routes through the site that would support active transport. It could include open space that would provide space for children’s play and for recreation. It is located within close proximity of the future Kidbrooke health centre.

**Equality Commentary**

The routes through the site would provide accessible routes from the Cator Estate to the community facilities in Kidbrooke Village and future residents will benefit from close proximity to the community facilities within the Village Centre.
**K2 Kidbrooke Village**

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**Sustainability Commentary**

The allocation includes significant measures to address biodiversity and environmental sustainability, including flood risk and integration with surrounding green spaces. It does not address economic sustainability as the development is expected to be residential-led. Social sustainability is supported through the introduction of community facilities that are

**Health Commentary**

The allocation includes community facilities and extensive green spaces that provide opportunities for recreation. The provision of a supermarket within the Hub also enhances access to healthy food. The allocation also includes the provision of a GP’s surgery. Given the scale of the site, the allocation could include provision of a public leisure centre.

**Equality Commentary**

The allocation would enhance connectivity with the surrounding neighbourhoods and improve access to the community facilities. It includes several community facilities within the site, including a community centre and a GP’s surgery, which are located in the Hub neighbourhood, which has the greatest level of public transport accessibility.
designed to serve the wider community and build connections between the development site and surrounding neighbourhoods.

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<td>The allocation includes workspace suitable for SMEs, which supports the economic sustainability of the borough. It also includes measures to enhance environmental sustainability, including building connections between the surrounding green spaces to enhance biodiversity.</td>
<td>The allocation includes measures to encourage active transport, with improved pedestrian and cycle routes and connections to the railway station. It could include additional facilities to support the health of the community based on an assessment of the health infrastructure needs.</td>
<td>The focus on enhancing public transport accessibility and accessibility through the site more broadly, for those with mobility impairments would significantly enhance equality of access in the area. Further, the colocation of SME workspace with the railway station and bus station would enhance access to employment.</td>
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**Sustainability Commentary**

The allocation includes measures to support ecological sustainability, including connecting green spaces on the site to the surrounding ecosystems. It also includes measures to support social sustainability, including provision of a

**Health Commentary**

The allocation includes publically accessible open spaces that provide opportunities for recreations. It also includes improvements to the public realm that would support active transport. It does not include any on-site health facilities

**Equality Commentary**

The allocation includes provision of a community facility, which would be accessible to the wider Kidbrooke area. It includes improvements to the public realm along Kidbrooke Park Road which would improve equality of access.
community facility and publically accessible open space. It does not address economic sustainability due to the location and nature of the site.

due to the proximity to the Kidbrooke Village Health Centre.

### K5 Homebase

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### Sustainability Commentary

The allocation seeks to improve access to the adjacent COS and to ensure that its openness and biodiversity are maintained. It also supports improvements to the public realm along

### Health Commentary

The allocation seeks to support recreation and active transport by enhancing access to the COS and the surrounding network of pathways. It also includes public green space within the site, which

### Equality Commentary

New routes through the site will enhance access for those with mobility impairments, and the development will increase the safety of the pathways leading into the COS.
| Kidbrooke Park Road and towards the railway station, supporting a reduction in car use. The allocation does not support economic sustainability objectives due to the expectation that it will be a residential-led scheme and to ensure that it complements the uses within the nearby Village Centre. | will provide child play space. The site is located in close proximity to the future Kidbrooke health centre and will improve access to it from the north. |
### Plumstead

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#### Sustainability Commentary

The allocation supports improvements to the character of the site and its integration into the character of the town centre. It includes commercial space, but could provide more specific recommendations for the nature of the commercial space and its layout/location within the site.

#### Health Commentary

The site does not include any specific measures to address health, but would improve the pedestrian experience of the area and of the high street, encouraging walking.

#### Equality Commentary

The provision of commercial uses fronting the high street could improve access to employment and local services. Improvements to the public realm along the high street improve access to services around the town centre.
P2 Car Wash Site

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Sustainability Commentary
The allocation includes measures to support the economic sustainability of the town centre by retaining employment floorspace and creating new workspace. It also addresses sense of place by improving the character of the high street and retaining the brick warehouse building. It could be improved by addressing environmental sustainability, potentially including greening.

Health Commentary
The allocation does not introduce any new health facilities; however, the improvement of the public realm along the high street would encourage walking.

Equality Commentary
The allocation would improve access to workspace, particularly for SMEs by retaining the existing low-cost workspace and introducing new workspace.
## P3 Former Power Station

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### Sustainability Commentary

- The allocation includes measures focused on supporting the economic sustainability of the area by retaining industrial workspace and intensifying the industrial use of the site. In preserving the industrial use, the allocation does

### Health Commentary

- The site does not propose to introduce any health facilities onto the site, but it does seek to intensify the industrial use, which would increase the employment on a site that has good pedestrian and cycling connectivity.

### Equality Commentary

- The intensification of the industrial uses on the site would increase access to employment on a site that is well-connected to public transport.
not present an opportunity to introduce housing. It could be improved by addressing environmental sustainability.

### P4 Former Plumstead Leisure Centre

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**Sustainability Commentary**
The size and constraints of the site mean that it is only suitable for housing and therefore cannot address sustainability objectives related to employment and economic growth. The allocation could include more detail surrounding.

**Health Commentary**
The allocation seeks to increase the density of housing in a walkable neighbourhood, supporting active transport, but does not propose any on-site health facilities.

**Equality Commentary**
The delivery of new housing in a highly accessible area supports equality of access to town centre services and public transport.
| planting and environmental sustainability. |   |   |
Thamesmead & Abbey Wood

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**Sustainability Commentary**

The allocation includes a large area of public open space, which supports objectives around access to open space, preserving and enhancing biodiversity and ecosystems and supporting active transport. It also includes a new school, which supports educational objectives.

**Health Commentary**

A new publically accessible green space would increase opportunities for recreation, and the provision of walking and cycling routes would support active transport. The integration of the new primary school with the walking and cycling routes would encourage active transport among children and inculcate positive behaviours.

**Equality Commentary**

The allocation includes provision of a new primary school, which would improve equality of access to education, particularly integrated with walking and cycling routes towards Woolwich and Plumstead. It also improves access to public open space and recreation opportunities.
### T2 Pettman Crescent Gyratory

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**Sustainability Commentary**

The allocation includes numerous measures to address the impacts of the major roads surrounding the site. These include reducing the volume of traffic and mitigating the air pollution. In addition, the allocation supports sustainable transport and retains the employment land, supporting the economic sustainability of the borough.

**Health Commentary**

The allocation introduces measures to mitigate the health impacts of the major roads surrounding the site. It also includes pedestrian and cycling infrastructure to encourage active transport.

**Equality Commentary**

By improving public transport and active transport accessibility to the site, and reducing the levels of traffic, the allocation improves equality of access into and around the site, which enhances equality of access to employment.
### T3 Thamesmead Waterfront

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**Sustainability Commentary**

The allocation includes provision of a new through-school to serve the area, significantly enhancing the social sustainability of the area. It also seeks to open the MOL to the public and to make significant enhancements to the biodiversity and environmental value of the wider area, including improving landscaping on the landfill site. The allocation also includes new public transport connections to reduce reliance on cars in Thamesmead.

**Health Commentary**

The introduction of new public green space increases opportunities for recreation and better connectivity with the riverfront enhances the area for active transport. The development of a new school will also enhance opportunities for active transport among students.

**Equality Commentary**

The development of improved public transport links will increase equality of access to employment and services for residents of Thamesmead. The proposed new school will increase equality of access to education and the MOL will provide access to green space.
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**Sustainability Commentary**

The allocation addresses objectives related to economic sustainability by introducing a more diverse range of town centre uses into the site. Additional, high-quality housing supports social sustainability, in addition to improved access to local community facilities. Improved connections to the surrounding green and blue spaces support environmental sustainability, though improved flood mitigation could be included as part of the improved landscaping.

**Health Commentary**

Improved access to the green and blue spaces adjacent to the town centre and to the riverfront provide greater opportunity for recreation. The allocation also introduces improved connections to the nearby health facilities.

**Equality Commentary**

The improved public transport connections increase equality of access to employment and services, and improved pedestrian connections to nearby facilities will improve equality of access to community facilities.
## T5 Thamesmere Civic Site

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### Sustainability Commentary

The allocation addresses social sustainability objectives by enhancing the library and leisure centre and through the provision of new, high-quality housing. It also seeks to improve access to adjacent green spaces. The site is in an area of high flood risk; the allocation could include landscaping measures that respond specifically to flooding.

### Health Commentary

The allocation includes improvements to the leisure centre, and introduces improved connections to surrounding green spaces, encouraging active transport and recreation.

### Equality Commentary

Improved leisure centre and library provision would improve equality of access to community facilities. Improvements to the adjacent public realm also support improved equality of access to facilities.
### T6 Cross Quarter and Lyndean Industrial Estate

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#### Sustainability Commentary

The allocation seeks to enhance the character of the area and improve the public realm. It also supports the economic sustainability of the area by retaining and enhancing the existing B-use floorspace. It could include measures to address flood risk and to increase biodiversity.

#### Health Commentary

The allocation would improve the public realm, encouraging active transport. It could include additional measures to address health objectives, including public open space and cycle infrastructure.

#### Equality Commentary

The allocation supports improved equality of access to employment and economic activity by retaining the B-use floorspace. It also increases residential density in an area with very good public transport accessibility, thereby increase access to employment and services. It could introduce new routes through the site to improve access from the neighbourhood to the west to Harrow Manorway.
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**Sustainability Commentary**

The allocation includes measures to address objectives around design and character of the development. It could include more details to address environmental and social sustainability. It could also include measures to address flood risk through landscaping or attenuation systems.

**Health Commentary**

The allocation includes measures to mitigate the noise impacts of the railway and seeks to improve the public realm to improve walkability. It could include additional measures related to active transport.

**Equality Commentary**

The allocation provides a significant uplift in residential density in the area around the future Crossrail station, enhancing equality of access to public transport.
**Woolwich**

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**Sustainability Commentary**

The site allocation seeks to ensure that the scale and design of development on the site reflects the character of the existing neighbourhood. The significance of the adjacent heritage assets is prioritised in this allocation, resulting in a major positive impact on heritage preservation. Objective 9 could be strengthened by identifying a specific community use based on identified

**Health Commentary**

The site allocation does not propose to introduce any new health facilities into the area; however it is in close proximity to the existing Fairview Health Centre. It is also located adjacent to the Waterfront Leisure Centre and within easy walking distance of the site proposed for the future leisure centre, allowing residents to access services that support healthy lifestyles.

**Equality Commentary**

The allocation does not include any site-specific measures related to affordable housing, but does include an allocation for community uses. This allocation is intended to be flexible to allow the development of the site to support the uplift in residents in this part of the town centre more broadly. The existing condition of Mortgramit Square includes inconsistent paving and significant
deficiency in this part of the town centre. Objective 15 could be strengthened in this allocation by identifying the types of habitats that should be provided in the podium garden. By introducing higher-density housing into the town centre, the site allocation would also support active transport. slopes, making it difficult to use or completely inaccessible to users with mobility impairments. The allocation requires this route to be improved to render it fully accessible, or to be replaced by a fully accessible route. This will increase the equality of access to public spaces within the town centre.

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**Sustainability Commentary** **Health Commentary** **Equality Commentary**
The potential negative impact of developing a site within an area of high flood risk is outweighed by the value of introducing a public open space adjacent to the river and opening views from the town centre core to the river. The allocation could be improved by providing more detail regarding the flood defence requirements and how the public open space could be integrated with the defences.

While the allocation does not introduce any health facilities, it includes improvements to the Thames Path and an area of public open space, which would improve opportunities for recreation and active transport. The site allocation could include additional measures to support recreation and active transport.

The allocation of the site will allow the leisure centre to move to a more accessible location and facility. It also improves the safety and security of the Thames Path and introduces a route that is more accessible from the town centre, making access easier for vulnerable people.

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### Sustainability Commentary

The allocation includes measures to increase the permeability of the site and to introduce active frontages on all the streets and routes. These measures will reduce the fear of crime in the site; support the integration of the site with those around it; and increase the sense of place. The allocation should be updated to include more detailed direction regarding environmental factors, such as the provision of green space at roof level to improve biodiversity.

### Health Commentary

The allocation does not introduce any health facilities into the site, but increased permeability would support active transport between different parts of the town centre. The allocation could be updated to include the provision of health facilities if they are required in this part of the town centre.

### Equality Commentary

The allocation introduces a new through route, which would be fully accessible and would support access to Powis Street for mobility-impaired residents. The allocation would also support the activation of Macbean Street, decreasing fear of crime and increasing comfort for vulnerable people.

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<td>The allocation includes specific measures to address design and to improve the permeability and security of the site. It could be improved by introducing measures to address biodiversity and energy efficiency. The provision of community facilities could be appropriate for this site, but must be considered in the context of the cumulative uplift in population resulting from the sites in this area.</td>
<td>The layout of the site encouraged by the allocation is intended to support walking by increasing permeability. The allocation could be improved by introducing more measures related specifically to active transport and recreation.</td>
<td>The allocation introduces an accessible route through the site; but otherwise does not include any specific measures to increase equality. The allocation could be improved by including measures to increase equality of access to employment, such as the provision of a nursery.</td>
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### W5 Calderwood and Monk Street Car Parks

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15. Protect, restore and enhance biodiversity, landscapes and the open space network, improving public access where appropriate.

16. Seek to improve air quality and protect natural resources such as soil, land and ecosystems.

17. Reduce and manage flood risk.

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<tr>
<td>By significantly reducing the amount of car parking in the town centre, the allocation is supporting objectives around reducing car use. It also significantly improves the public realm and general appearance of the site, and supports goals around employment. It does not specifically include measures related to biodiversity and resource management, which could be addressed in an updated allocation.</td>
<td>By reducing car parking, the allocation is supporting active transport. It also improves the public realm around the site, which supports walkability. It could include more measures related to cycling, and there is the potential for this site to include a cycle parking hub to support the educational facility and trips by bicycle into the town centre more generally.</td>
<td>Reducing the accessibility of the town centre by car also makes access more egalitarian.</td>
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**W6 Island Business Site**

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15. Protect, restore and enhance biodiversity, landscapes and the open space network, improving public access where appropriate.

16. Seek to improve air quality and protect natural resources such as soil, land and ecosystems.

17. Reduce and manage flood risk.

**Sustainability Commentary**

By creating routes through the site and introducing a public open space at the centre, the allocation supports objectives related to design and sense of place. It also seeks to retain a proportion of the existing employment floorspace through reprovision in a format that better serves the occupiers. The allocation does not introduce any site-specific measures to support environmental sustainability, apart from the requirement to provide some planting.

**Health Commentary**

The site does not include any specific measures to improve health. By increasing housing density within the town centre and improving permeability through the site, it can support a walkable environment.

**Equality Commentary**

The allocation includes accessible routes through the site, which would improve access through the town centre for those with mobility impairments. The provision of improved office space for SMEs can increase equality of access to entrepreneurship.

**W7 Love Lane**

**IIA Objective**

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15. Protect, restore and enhance biodiversity, landscapes and the open space network, improving public access where appropriate.

16. Seek to improve air quality and protect natural resources such as soil, land and ecosystems.

17. Reduce and manage flood risk.

**Sustainability Commentary**

The allocation would create a high-quality design that includes areas of public open space, supporting sense of place and belonging. It also includes measures to protect the setting of the Grade II* listed Royal Artillery Barracks. It does not include measures to enhance biodiversity or to protect resources. It could be improved by adding specific biodiversity expectations for the open and green spaces.

**Health Commentary**

The allocation includes several measures to improve the walkability of the site and includes a requirement to provide a significant area of play space to support children’s recreation. It could be improved by adding measures to encourage cycling.

**Equality Commentary**

The allocation includes a community use, and expects this to be provided in the form of a nursery to support the early years needs of children within the development and in the wider area. The allocation requires the routes through the site to be fully accessible and supports public realm improvements that would increase the safety of the routes.

<table>
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<tr>
<th>W8 Former Post Office</th>
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<td>1.</td>
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<td>2.</td>
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16. Seek to improve air quality and protect natural resources such as soil, land and ecosystems.

17. Reduce and manage flood risk.

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<tr>
<td>The allocation seeks to protect and enhance the existing character of the town centre, with a specific focus on enhancing the setting and significance of the Grade II listed Equitable Building. Due to relatively small size of the site and the expected scale of development, the provision of any additional open space would not be feasible, but the allocation includes improvements to existing open spaces around the site.</td>
<td>No site-specific measures are proposed to support health, though the allocation includes improvements to the public realm that would encourage walking. The provision of additional food and drink floorspace could have minor negative health impacts, but supports the expansion of an existing cluster of businesses in the area.</td>
<td>The allocation includes the provision of small-scale food and drink units, which could improve access to shop space for local businesses.</td>
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W9 Viscount House & Tramshed

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<td>The allocation makes a number of significant public realm improvements that would enhance the character and appearance of the area. It could be improved by making more specific reference to biodiversity, particularly given the scale of the site. It could also propose the creation of a district energy system to reduce greenhouse gas emissions.</td>
<td>No site-specific measures are proposed to support health, though the allocation includes improvements to the public realm that would encourage walking. The provision of additional food and drink floorspace could have minor negative health impacts, but supports the expansion of an existing cluster of businesses in the area.</td>
<td>The allocation includes the provision of small-scale food and drink units, which could improve access to shop space for local businesses.</td>
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**W10 DLR Over-station Development**

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16. Seek to improve air quality and protect natural resources such as soil, land and ecosystems.

17. Reduce and manage flood risk.

Sustainability Commentary | Health Commentary | Equality Commentary
--- | --- | ---
The small size of the site, and the constraint of building atop the DLR station entrance make the delivery of sustainability goals challenging. The allocation supports a positive relationship between the site and the adjacent townscape and listed buildings, enhancing the sense of place. It could include more specific measures to support biodiversity, particularly given the lack of green space in the area. | The allocation does not include any health related measures. The site is adjacent to the site projected for the future leisure centre, and it will improve the surrounding public realm, encouraging walking. The small scale of the site precludes the inclusion of public green space. The allocation could include a community health facility, for example a GP’s office, depending on the needs of the broader area and the delivery of these services elsewhere in the town centre. | The inclusion of a hotel in the allocation would support the goal of increasing access to employment. The allocation also includes flexible workspace and is located atop the DLR station and adjacent to the railway station and bus stops, increasing the accessibility of employment in the town centre.

W11 Spray Street

IIA Objective | Likely Effects
--- | ---
1. Create environments that support good health and well-being and reduce health inequalities. | Green
2. Reduce and prevent crime and fear of crime. | Green
3. Preserve and enhance the significance of areas and buildings designated for their historic and/or archaeological interest and protect their setting. | Green
4. Create places, spaces and buildings that are well-designed, integrate effectively with one another, respect identified views and vistas, and enhance the diversity and distinctiveness of the local character. | Green
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**Sustainability Commentary**

| The allocation includes several measures to improve the character of the area and to enhance the settings of listed buildings. It also includes measures related to economic sustainability centred on the town centre’s night time economy. It could be expanded to include measures related to biodiversity, greenhouse gas emissions and surface water flooding. |

**Health Commentary**

| The allocation expects development on the site to be car free. It also increases permeability and improves the public realm, encouraging walking, particularly from the residential neighbourhoods to the east and southeast. |

**Equality Commentary**

| The allocation supports increased access to employment opportunities in the town centre. It also introduces fully accessible routes through and spaces within the site. |

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**W12 Arsenal Way Industrial Estate**

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<tr>
<td>The allocation supports the economic sustainability of the town centre by preserving industrial uses. It does not introduce any environmental sustainability measures and could be improved by introducing measures to support biodiversity.</td>
<td>The allocation includes pedestrian improvements to routes connecting the site to public transport.</td>
<td>The allocation supports equality of access to employment by ensuring that industrial uses are maintained in an area with high public transport accessibility. The allocation could include a more flexible use class designation to allow for skills-training facilities.</td>
</tr>
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</table>
7 Conclusion and Recommendations

7.1 This interim report presents the initial appraisal for the Site Allocations Preferred Approach document. The primary purpose of the interim IIA has been to assess whether and to what extent the Site Allocations Preferred Approach is consistent with the Royal Borough’s objectives for achieving a sustainable, healthy and equitable community. These objectives are set out in the IIA Framework.

7.2 The IIA process has allowed predication of the likely effects of the Site Allocations Preferred Approach against these IIA objectives at an early stage in plan preparation (Regulation 18). Given that the IIA process is iterative, it has also allowed the opportunity to minimise negative impacts and enhance positive effects where these arise and, ultimately, to improve the sustainability, health and equality impact of the Site Allocations Local Plan.

7.3 Overall, the Site Allocations Preferred Approach document is considered to have a generally positive impact in relation to sustainability, health and equality when compared the alternative of not allocating sites. There will be some uncertainties; however no significant negative effects were identified through the appraisal at this stage. The results of this interim appraisal will help to inform the refinement of the draft Local Plan.

7.4 Strengths: The Site Allocation proposals have been appraised as performing strongly against the objectives in the IIA Framework. The proposed Site Allocations are particularly effective at contributing to objectives around design (Objectives 3 and 4), economic development (Objectives 5 and 6), sustainable transport (Objective 13) and access to housing (Objective 8). The sites will positively reinforce the spatial strategy of the Core Strategy, and enable the delivery of housing and employment in sustainable locations that make the best use of previously developed land.

7.5 Uncertainties: Overall, there will be some uncertainties regarding potential long-term effects, as contexts and external factors will inevitably change over time. However the proposals reflect a considered effort to achieve a balance between planning certainty and future proofing for flexibility, where this is required.

7.6 Negative effects: No significant negative effects were identified through the appraisal of the preferred approach document. Minor negative effects were identified in relation to flood risk on several sites. This reflects the high flood risk present across large areas of Royal Greenwich and the fact that much of the borough’s brownfield sites are located in areas of high flood risk.

7.7 As well as the effects listed above, it is acknowledged that many sustainability issues result from the accumulation of multiple small and often indirect effects. While these effects might be positive, there is also the potential for cumulative effects to be negative. It is important therefore that these cumulative and synergistic effects are also appraised. The appraisal process has indicated that most of the predicted effects are generally either positive or neutral.
7.8 There may be scope to consider the cumulative/synergistic effects during the monitoring stage, at which time the appraisal of other key Local Plan documents will also have been undertaken. The monitoring of objectives and indicators will also be conducted through the Royal Borough’s Authorities Monitoring Report (AMR). Over time, patterns or cumulative effects may emerge that the IIA process may not have identified at this stage in the evolution of the Site Allocations Local Plan.

**Next steps**

7.9 This Interim IIA Report has been prepared to provide an overview of the assessment work undertaken on the Site Allocations Local Plan to date. It will be published for consultation alongside the Site Allocations Local Plan Preferred Approach Document, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

7.10 Consultation comments received on the Preferred Approach document and this Interim IIA Report will be considered and used to shape the next version of the Site Allocations Local Plan.

7.11 The final IIA Report (Stage C) will incorporate, as appropriate, the comments received through this consultation process. The final IIA Report will be published alongside the proposed Site Allocations Local Plan for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Proposed monitoring indicators will be included in the final IIA report, and the monitoring framework will be finalised as part of the adoption of the Site Allocations Local Plan.
## APPENDIX A1 – Plan, Policies, Programmes and Strategies

<table>
<thead>
<tr>
<th>Sustainability Theme</th>
<th>Relevant Plan, Programme and/or Policy</th>
<th>SEA Topic(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve the health and well-being of the local community and local environment</td>
<td><strong>International/European</strong></td>
<td>• Population and growth</td>
</tr>
<tr>
<td></td>
<td>• European Air Quality Directive (2008/50/EC)</td>
<td>• Human health &amp; well being</td>
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<td>• EU Noise Directive (2002/49/EC)</td>
<td>• Air quality</td>
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<td>• EU 7th Environmental Action Plan</td>
<td>• Environment &amp; biodiversity</td>
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<td>• Seveso III Directive (2012/18/EU)</td>
<td>• Water and soil</td>
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<td></td>
<td><strong>National</strong></td>
<td>• Climate change</td>
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<td>• UK Air Quality Strategy 2007</td>
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<td>• National Planning Policy Framework (2012)</td>
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<td></td>
<td><strong>Regional</strong></td>
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<td></td>
<td>• The London Plan 2015</td>
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<td>• Health and Well Being Strategy</td>
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<td>• Royal Greenwich Core Strategy</td>
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<td>• Greenwich Children and Young People’s Plan</td>
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<td></td>
<td>• Education &amp; awareness</td>
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<tr>
<td></td>
<td>• Equality and social inclusion</td>
<td></td>
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<tr>
<td>To provide a wide range of high quality designed homes, both affordable and market housing and of varying dwelling types, sizes and tenures.</td>
<td><strong>National</strong></td>
<td>• Population and growth</td>
</tr>
<tr>
<td></td>
<td>• National Planning Policy Framework (2012)</td>
<td>• Human health &amp; well being</td>
</tr>
<tr>
<td></td>
<td><strong>Regional</strong></td>
<td>• Sustainable living</td>
</tr>
<tr>
<td></td>
<td>• The London Plan 2015</td>
<td>• Human health &amp; well being</td>
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<td></td>
<td>• Adapting to climate change: a checklist for development guidance on designing development in a changing climate</td>
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<td><strong>Local</strong></td>
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<tr>
<td></td>
<td>• Royal Greenwich Core Strategy</td>
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<td></td>
<td><strong>Population</strong></td>
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<tr>
<td></td>
<td>• Education &amp; awareness</td>
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<tr>
<td></td>
<td>• Equality and social inclusion</td>
<td></td>
</tr>
<tr>
<td>To widen opportunities for home ownership by improving the affordability of housing and increasing overall housing provision</td>
<td><strong>National</strong></td>
<td>• Equality &amp; social inclusion</td>
</tr>
<tr>
<td></td>
<td>• National Planning Policy Framework (2012)</td>
<td>• Sustainable living</td>
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<tr>
<td></td>
<td><strong>Regional</strong></td>
<td>• Human health &amp; well being</td>
</tr>
<tr>
<td></td>
<td>• The London Plan 2015</td>
<td>• Population and growth</td>
</tr>
<tr>
<td></td>
<td>• Royal Greenwich Core Strategy</td>
<td>• Equality &amp; Social Inclusion</td>
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<tr>
<td></td>
<td><strong>Population</strong></td>
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<tr>
<td>To create a strong sense of community able to support vulnerable and disadvantaged people</td>
<td><strong>Regional</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The London Plan 2015</td>
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</tr>
<tr>
<td></td>
<td>• Royal Greenwich Core Strategy</td>
<td></td>
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<td></td>
<td>**Population and growth</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Equality &amp; Social Inclusion</td>
<td></td>
</tr>
<tr>
<td>To provide quality education, social support and learning for all</td>
<td><strong>Local</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Greenwich Children and Young People’s Plan</td>
<td>• Population &amp; growth</td>
</tr>
<tr>
<td></td>
<td>• Greenwich School Organisation Plan</td>
<td>• Education &amp; awareness</td>
</tr>
<tr>
<td></td>
<td><strong>Population</strong></td>
<td>• Equality and social inclusion</td>
</tr>
<tr>
<td></td>
<td>• Education &amp; awareness</td>
<td></td>
</tr>
<tr>
<td>To improve attendance at school and raise the levels of educational attainment</td>
<td><strong>National</strong></td>
<td>• Education &amp; awareness</td>
</tr>
<tr>
<td></td>
<td>• Building Schools for the Future</td>
<td>• Equality &amp; social inclusion</td>
</tr>
<tr>
<td></td>
<td><strong>Population</strong></td>
<td></td>
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<td>Sustainability Theme</td>
<td>Relevant Plan, Programme and/or Policy</td>
<td>SEA Topic(s)</td>
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<tr>
<td>To improve safety, reduce crime and fear of crime</td>
<td>Local: Royal Greenwich Core Strategy, Greenwich Children and Young People’s Plan</td>
<td>Human health &amp; well being, Community cohesion</td>
</tr>
<tr>
<td>To reduce discrimination and improve opportunity and equality</td>
<td>Regional: London Plan, Local: Royal Greenwich Core Strategy, Greenwich Children and Young People’s Plan</td>
<td>Equality &amp; social inclusion, Community cohesion</td>
</tr>
<tr>
<td>To provide high quality and accessible services for all groups of people</td>
<td>National: National Planning Policy Framework (2012), Regional: The London Plan 2015, Local: Royal Greenwich Core Strategy, Greenwich Children and Young People’s Plan</td>
<td>Population &amp; growth, Equality &amp; social inclusion, Human health &amp; well being</td>
</tr>
<tr>
<td>To provide high quality accessible local health care facilities and services which are sufficient to meet the needs of and accessible to the entire community</td>
<td>Regional: Health and Well Being Strategy, Local: Royal Greenwich Core Strategy, Greenwich Children and Young People’s Plan</td>
<td>Population &amp; growth, Equality &amp; social inclusion, Human health &amp; well being</td>
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<tr>
<td>Sustainability Theme</td>
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<tr>
<td>To improve public transport and accessibility</td>
<td><strong>National</strong>&lt;br&gt;• National Planning Policy Framework (2012)&lt;br&gt;<strong>Regional</strong>&lt;br&gt;• The London Plan 2015&lt;br&gt;• Mayor of London Transport Strategy&lt;br&gt;• South East London Sub-Regional Transport Plan&lt;br&gt;• Port of London Authority Plan&lt;br&gt;<strong>Local</strong>&lt;br&gt;• Royal Greenwich Core Strategy, Masterplans</td>
<td>• Climate change&lt;br&gt;• Population &amp; growth&lt;br&gt;• Human health &amp; well being&lt;br&gt;• Air quality&lt;br&gt;• Water and soil&lt;br&gt;• Accessibility&lt;br&gt;• Equality &amp; social inclusion&lt;br&gt;• Sustainable living</td>
</tr>
<tr>
<td>To prioritise the needs of pedestrians, people with disabilities, cyclists and public transport users before the private motor vehicle;</td>
<td><strong>National</strong>&lt;br&gt;• National Planning Policy Framework (2012)&lt;br&gt;<strong>Regional</strong>&lt;br&gt;• The London Plan 2015&lt;br&gt;<strong>Local</strong>&lt;br&gt;• Royal Greenwich Core Strategy, Local Implementation Plan</td>
<td>• Population &amp; growth&lt;br&gt;• Human health &amp; well being&lt;br&gt;• Accessibility&lt;br&gt;• Sustainable living&lt;br&gt;• Environment &amp; biodiversity&lt;br&gt;• Air quality&lt;br&gt;• Climate change</td>
</tr>
<tr>
<td>To maximise recreation and leisure opportunities and improve the quality and provision of facilities and infrastructure</td>
<td><strong>National</strong>&lt;br&gt;• National Planning Policy Framework (2012)&lt;br&gt;• Estuary Edges Guidance&lt;br&gt;<strong>Local</strong>&lt;br&gt;• Royal Greenwich Core Strategy, Local Implementation Plan</td>
<td>• Population &amp; growth&lt;br&gt;• Environment &amp; biodiversity&lt;br&gt;• Human health &amp; well being&lt;br&gt;• Water &amp; soil&lt;br&gt;• Accessibility&lt;br&gt;• Sustainable living</td>
</tr>
<tr>
<td>To reduce adverse impacts of noise and vibration generated by traffic, development and other noise sources</td>
<td><strong>International/European</strong>&lt;br&gt;• EU Noise Directive (2002/49/EEC)&lt;br&gt;<strong>National</strong>&lt;br&gt;• National Planning Policy Framework (2012)&lt;br&gt;<strong>Regional</strong>&lt;br&gt;• The London Plan 2015&lt;br&gt;• Port of London Authority Plan&lt;br&gt;<strong>Local</strong>&lt;br&gt;• Royal Greenwich Core Strategy, Local Implementation Plan</td>
<td>• Population &amp; growth&lt;br&gt;• Human health &amp; well being</td>
</tr>
<tr>
<td>To reduce traffic congestion and improve transport energy efficiency.</td>
<td><strong>National</strong>&lt;br&gt;• National Planning Policy Framework (2012)&lt;br&gt;<strong>Regional</strong>&lt;br&gt;• The London Plan 2015&lt;br&gt;• South East London Sub-Regional Transport Plan</td>
<td>• Population &amp; growth&lt;br&gt;• Human health &amp; well being&lt;br&gt;• Air quality&lt;br&gt;• Climate change&lt;br&gt;• Accessibility</td>
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<td>SEA Topic(s)</td>
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</tbody>
</table>
| To provide people with a range of employment opportunities in conjunction with the training and other services and facilities that will enable people to access these opportunities. | Plan  
- Port of London Authority Plan  
Local  
- Royal Greenwich Core Strategy,  
- Local Implementation Plan                                                                 | Population & growth  
- Human health & well being  
- Equality & social inclusion  
- Community cohesion |
| To regenerate the most disadvantaged areas of the Borough                         | Regional  
- The London Plan 2015  
Local  
- Royal Greenwich Core Strategy                                                                 | Population & growth  
- Human health & well being  
- Equality & social inclusion  
- Community cohesion  
- Sustainable living |
| To reduce poverty and tackle financial exclusion                                   | Regional  
- The London Plan 2015  
Local  
- Greenwich Children and Young People’s Plan  
- Greenwich Equality Policy                                                               | Population & growth  
- Human health & well being  
- Equality & social inclusion  
- Community cohesion  
- Sustainable living |
| To improve equality and cultural cohesion by removing barriers to participation and enjoyment of cultural opportunities | Local  
- Royal Greenwich Core Strategy  
- Greenwich Equality Policy                                                               | Population & growth  
- Human health & well being  
- Equality & social inclusion  
- Community cohesion |
| To raise cultural awareness, improve cultural diversity and promote cross culture interaction | National  
Local  
- Royal Greenwich Core Strategy  
- Greenwich Equality Policy                                                               | Population & growth  
- Human health & well being  
- Equality & social inclusion  
- Community cohesion |
| To conserve and/or enhance areas identified as having significant landscape character and biodiversity values | International/European  
- EU Habitats Directive (92/43/EEC)  
- European landscape Convention  
National  
- Estuary Edges Guidance  
Local  
- Royal Greenwich Core Strategy | Landscape, flora & fauna  
- Environment & biodiversity |
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<th>SEA Topic(s)</th>
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</table>
| To protect areas, places and buildings that exhibit cultural heritage values and are of historical and/or archaeological importance | **International/European**  
• European Landscape Convention  
• World Heritage Convention (1972)  
**National**  
• National Planning Policy Framework (2012)  
**Historic England Guidance (2016)**  
• Historic England Advice Note 8  
**Regional**  
  • Thames Estuary 2100 Plan  
**Local**  
  • Royal Greenwich Core Strategy | • Community cohesion  
• Human health & well being  
• Cultural heritage & character  
• Landscape, flora & fauna  
• Environment & biodiversity |
| To conserve sites of importance for nature conservation                            | **International/European**  
• EU Biodiversity Action Plan, 2006  
• EU Habitats Directive (92/43/EEC)  
• European Landscape Convention  
**National**  
• National Biodiversity Strategy  
• National Planning Policy Framework (2012)  
• Estuary Edges Guidance  
**Regional**  
  • The London Plan 2015  
**Local**  
  • Biodiversity Action Plan  
  • Royal Greenwich Core Strategy | • Human health & well being  
• Cultural heritage & character  
• Landscape, flora & fauna  
• Environment & biodiversity  
• Water & soil |
| To protect flora and fauna which are important on an international, national and local scale | **International/European**  
• EU 7th Environmental Action Plan  
• EU Biodiversity Action Plan  
• EU Habitats Directive (92/43/EEC)  
• EU Birds Directive (2009/147/EEC)  
• European Landscape Convention  
**National**  
• National Biodiversity Strategy  
• National Planning Policy Framework (2012)  
• Estuary Edges Guidance  
**Regional**  
  • The London Plan 2015  
• Green Capital: Green Infrastructure for a Future City (2016)  
**Local**  
  • Biodiversity Action Plan  
  • Royal Greenwich Core Strategy | • Cultural heritage & character  
• Landscape, flora & fauna  
• Environment & biodiversity  
• Water & soil |
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</thead>
</table>
| To maintain and enhance Metropolitan Open Land and the Green Chain | **International/European**  
• European Landscape Convention  
• National  
• National Planning Policy Framework (2012)  
• Regional  
• The London Plan 2015  
• Local  
• Royal Greenwich Core Strategy  
• Biodiversity Action Plan | • Cultural heritage & character  
• Landscape, flora & fauna  
• Environment & biodiversity  
• Water & soil |
| To improve air quality                                  | **International/European**  
• The Kyoto Protocol  
• EU 7th Environmental Action Plan  
• European Air Quality Directive (2008/50/EC)  
• National  
• National Planning Policy Framework (2012)  
• UK Air Quality Strategy 2007  
• UK Climate Change Programme  
• Regional  
• The London Plan 2015  
• Mayor’s Air Quality Strategy  
• Air Quality Action Plan 2002  
• Local  
• Royal Greenwich Core Strategy  
• Air Quality Action Plan | • Population & growth  
• Human health & well being  
• Air quality  
• Climate change  
• Sustainable living |
| To protect the water environment                        | **International/European**  
• European Water Framework Directive (2000/60/EC)  
• National  
• National Planning Policy Framework (2012)  
• Estuary Edges Guidance  
• Regional  
• Thames River Basin Management Plan  
• Thames Corridor Catchment Abstraction Management Strategy  
• Thames Estuary 2100 Plan  
• Port of London Authority Plan  
• Local  
• Royal Greenwich Core Strategy | • Environment & biodiversity  
• Landscape, flora & fauna  
• Water and soil |
| To protect soils against erosion and pollution and conserve land with significant geological characteristics | **International/European**  
• EU 7th Environmental Action Plan  
• Urban Wastewater Treatment Directive (91/271/EEC) | • Water and soil  
• Environment & biodiversity  
• Landscape, flora & fauna |
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<th>Sustainability Theme</th>
<th>Relevant Plan, Programme and/or Policy</th>
<th>SEA Topic(s)</th>
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</thead>
</table>
| National             | • Safeguarding our soils: A Strategy for England  
                          • National Planning Policy Framework (2012)  
                          • Estuary Edges Guidance  
                          Local  
                          • Royal Greenwich Core Strategy |             |
| To reduce flood risk | **International/European**  
                          • Urban Wastewater Treatment Directive (91/271/EEC)  
                          **National**  
                          • National Planning Policy Framework (2012)  
                          • Estuary Edges Guidance  
                          **Regional**  
                          • Thames Region Catchment Flood Management Plan  
                          • Thames River Basin Management Plan  
                          • Thames Estuary 2100 Plan  
                          **Local**  
                          • Royal Greenwich Core Strategy  
                          • Thames Estuary 2100 briefing for RBG (2016) | • Water and soil  
                          • Climate change |
| To reduce the generation of waste and to encourage re-use and recycling of waste | **International/European**  
                          • Directive 75/442/EEC Waste  
                          • Urban Wastewater Treatment Directive (91/271/EEC)  
                          **National**  
                          • National Waste Strategy  
                          • National Planning Policy Framework (2012)  
                          **Regional**  
                          • Mayor of London Waste Strategy  
                          **Local**  
                          • Royal Greenwich Core Strategy | • Climate change  
                          • Sustainable living  
                          • Water & soil  
                          • Air quality  
                          • Environment & biodiversity |
| To provide sufficient opportunities for new waste facilities of the right type and capacity, in the right place and at the right time | **International/European**  
                          • Urban Wastewater Treatment Directive (91/271/EEC)  
                          **National**  
                          • National Waste Strategy  
                          • National Planning Policy Framework (2012)  
                          **Regional**  
                          • Mayor of London Waste Strategy  
                          **Local**  
                          • Royal Greenwich Core Strategy | • Climate change  
                          • Sustainable living  
                          • Water & soil  
                          • Air quality  
                          • Environment & biodiversity  
                          • Human health & well being |
<p>| To secure the recovery of... | <strong>International/European</strong>  | • Climate change |</p>
<table>
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<tr>
<th>Sustainability Theme</th>
<th>Relevant Plan, Programme and/or Policy</th>
<th>SEA Topic(s)</th>
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</thead>
</table>
| **disposal of waste in the nearest and most efficient location, with minimal harm to the environment, and whilst meeting the needs of the local community.** | • EU Directive on Waste (2008/98/EC)  
• Urban Wastewater Treatment Directive (91/271/EEC)  
National  
• National Waste Strategy  
• National Planning Policy Framework (2012)  
Regional  
• Mayor of London Waste Strategy  
Local  
• Royal Greenwich Core Strategy | • Sustainable living  
• Water & soil  
• Air quality  
• Environment & biodiversity  
• Human health & well being |
| **Prudent use of natural resources, particularly water.** | International/European  
• Directive 2006/12/EC Waste  
• Directive 2000/60/EC Water  
• EU Sustainable Development Strategy  
• Urban Wastewater Treatment Directive (91/271/EEC)  
National  
• National Planning Policy Framework (2012)  
Regional  
• The London Plan 2015  
• Thames River Basin Management Plan  
• Draft Thames Waterway Management Plan  
• Thames Corridor Catchment Abstraction Management Strategy  
Local  
• Royal Greenwich Core Strategy | • Climate change  
• Sustainable living  
• Water & soil  
• Air quality  
• Environment & biodiversity |
| **To contribute to the reduction in greenhouse gases emissions** | International/European  
• The Kyoto Protocol  
• EU 7th Environmental Action Plan  
National  
• UK Climate Change Programme  
• NPPF  
Regional  
• The London Plan 2015  
Local  
• Royal Greenwich Core Strategy | • Climate change  
• Sustainable living  
• Air quality  
• Environment & biodiversity |
| **To increase energy efficiency** | National  
• UK Sustainable Development Strategy  
• NPPF  
• Adapting to climate change: a checklist for development guidance on designing development in a changing climate  
Regional | • Climate change  
• Sustainable living  
• Water & soil  
• Air quality  
• Environment & biodiversity |
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</table>
| To promote the use of previously developed land, ensuring that new developments make efficient and appropriate use of land | National  
• NPPF  
Regional  
• The London Plan 2015  
Local  
• Royal Greenwich Core Strategy | • Climate change  
• Sustainable living  
• Water & soil  
• Air quality  
• Environment & biodiversity  
• Human health & well being |
| To encourage the remediation of contaminated land | National  
• NPPF  
Regional  
• The London Plan 2015  
Local  
• Royal Greenwich Core Strategy | • Water and Soil  
• Environment & biodiversity |
| To promote buildings that are environmentally efficient to build and operate | National  
• NPPF  
Regional  
• The London Plan 2015  
• Adapting to climate change: a checklist for development guidance on designing development in a changing climate  
Local  
• Royal Greenwich Core Strategy | • Population and growth  
• Human health & well being  
• Climate change  
• Air quality  
• Water & soil  
• Environment & biodiversity |
| To harness renewable energy potential and maximise its use | International/European  
• EU Sustainable Development Strategy  
National  
• NPPF  
• UK Sustainable Development Strategy  
Regional  
• Mayor of London Energy Strategy 2001  
• Adapting to climate change: a checklist for development guidance on designing development in a changing climate  
Local  
• Royal Greenwich Core Strategy | • Climate change  
• Air quality  
• Sustainable living |
| To implement effective spatial planning and infrastructure provision to reduce flood risk. | International/European  
• Urban Wastewater Treatment Directive (91/271/EEC)  
National  
• National Planning Policy Framework (2012)  
• Estuary Edges Guidance | • Water & soil  
• Climate change  
• Sustainable living |
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<th>SEA Topic(s)</th>
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</table>
| **Regional**         | • Thames Region Catchment Flood Management Plan  
                      • Thames River Basin Management Plan  
                      • Draft Thames Waterway Management Plan  
                      • Thames Estuary 2100 Plan  
                      • Port of London Authority Plan |
| **Local**            | • Royal Greenwich Core Strategy  
                      • Thames Estuary 2100 briefing for RBG |
| **To minimise the extent of noise pollution, specifically the number of households that suffer adverse impacts from noise sources** | **International/European**  
                      • EU Noise Directive (2002/49/EC) |
|                      | **National**  
                      • NPPF |
|                      | **Local**  
                      • Royal Greenwich Core Strategy, |
| **Reduce dependence on the private motor vehicle.** | **International/European**  
                      • The Kyoto Protocol  
                      • The Paris Agreement |
|                      | **National**  
                      • National Planning Policy Framework (2012) |
|                      | **Regional**  
                      • The Mayor’s London Transport Strategy  
                      • South East London Sub-Regional Transport Plan  
                      • Port of London Authority Plan |
|                      | **Local**  
                      • Royal Greenwich Core Strategy  
                      • Local Implementation Plan |
| **To prevent major accidents and/or hazards involving dangerous substances and to limit the consequences in the unlikely event of one occurring.** | **International/European**  
                      • Hazardous Waste Directive (91/689/EEC) |
|                      | **National**  
                      • National Planning Policy Framework (2012) |
|                      | **Regional**  
                      • Port of London Authority Plan |
|                      | **Local**  
                      • Royal Greenwich Core Strategy |
| **To provide a built environment characterised by excellence in urban design and architecture, that enhances public realm and open spaces, and prioritises the** | **National**  
                      • National Planning Policy Framework (2012)  
                      • BREEAM  
                      • UK Sustainable Development Strategy  
                      • Estuary Edges Guidance |
|                      | **Population & growth**  
                      **Sustainable living**  
                      **Cultural heritage & character**  
                      **Equality & social inclusion**
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<th>SEA Topic(s)</th>
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</table>
| environment for pedestrians and cyclists.                                            | • Historic England Guidance  
                           Local  
                           • Royal Greenwich Core Strategy                                                                         | • Human health & well being                             |
| To promote economic growth and employment                                           | **International/European**  
                           • EU Sustainable Development Strategy  
                           • UK Sustainable Development Strategy  
                           **National**  
                           • National Planning Policy Framework (2012)  
                           **Regional**  
                           • The London Plan 2015  
                           **Local**  
                           • Royal Greenwich Core Strategy                                                                         | • Population & growth  
                           • Human health & well being  
                           • Equality & social inclusion  
                           • Economic prosperity |
| To establish a clear centre hierarchy, safeguard and enhance the viability and vitality of town centres, and reinforce the role of neighbourhood centres/parades. | **International/European**  
                           • EU Sustainable Development Strategy  
                           • UK Sustainable Development Strategy  
                           **National**  
                           • National Planning Policy Framework (2012)  
                           **Regional**  
                           • The London Plan 2015  
                           **Local**  
                           • Royal Greenwich Core Strategy                                                                         | • Cultural heritage & character  
                           • Population & growth  
                           • Human health & well being  
                           • Accessibility |
| Increase the prosperity and diversity of local businesses                           | **National**  
                           • NPPF  
                           **Regional**  
                           • The London Plan 2015  
                           • Thames Gateway Development and Investment Framework  
                           • Port of London Authority Plan  
                           **Local**  
                           • Royal Greenwich Core Strategy                                                                         | • Human health & well being  
                           • Sustainable living  
                           • Economic prosperity |
| To improve the competitiveness of local business and enterprise and maximise opportunities for local business growth | **National**  
                           • National Planning Policy Framework (2012)  
                           **Regional**  
                           • The London Plan 2015  
                           • Thames Gateway Development and Investment Framework  
                           • Port of London Authority Plan  
                           **Local**  
                           • Royal Greenwich Core Strategy                                                                         | • Population & growth  
                           • Human health & well being  
                           • Equality & social inclusion  
                           • Economic prosperity |
| To provide a high quality business environment                                       | **Regional**  
                           • Port of London Authority Plan  
                           **Local**  
                           • Royal Greenwich Core Strategy                                                                         | • Population & growth  
                           • Human health & well being  
                           • Economic prosperity |
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<tr>
<td>To strengthen Greenwich’s position as a visitor destination and expand tourism across the Borough</td>
<td>• Royal Greenwich Core Strategy</td>
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<tr>
<td></td>
<td>International</td>
<td>• Economic prosperity</td>
</tr>
<tr>
<td></td>
<td>• World Heritage Convention (1972)</td>
<td>• Human health &amp; well being</td>
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<tr>
<td></td>
<td>National</td>
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<td></td>
<td>• Historic England Guidance</td>
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<td></td>
<td>Regional</td>
<td></td>
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<tr>
<td></td>
<td>• Port of London Authority Plan</td>
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<td>Local</td>
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<td>• Royal Greenwich Core Strategy</td>
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<td>To ensure that economic development is sustainable and takes social and environmental considerations into account to provide improved quality of life for residents</td>
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<td>• The London Plan 2015</td>
<td>• Population &amp; growth</td>
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<td>• Sustainable living</td>
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<td>• Air quality</td>
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<td>To promote the image of Greenwich as a business location for modern business and investment</td>
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<td>• The London Plan 2015</td>
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<td>• Sustainable living</td>
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### APPENDIX A2 – Baseline Data

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<td><strong>ENVIRONMENT</strong></td>
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| Species population and areas of priority habitat    | The following priority habitats and species have been identified on the basis that they are nationally and/or locally rare (or in decline) and are distinct to Greenwich:  
  Priority Habitats:  
  • Acid Grassland and Heath land  
  • Gardens  
  • Parks and Green Spaces  
  • Wasteland  
  • Waters Edge, Rivers, Ponds and Wetland  
  • Woodland  
  Priority Species:  
  • Bats  
  • Black Poplar  
  • Black Redstart  
  • Hedgehog  
  • Stag Beetle  
  • Water Vole | No direct comparators or targets available                                                                                                           |             | The Core Strategy recognises the importance of protecting designated sites. Policy OS4 states that the borough’s “rich biodiversity and geodiversity will be protected, restored and enhanced, including the priority habitats and species identified in the Greenwich Biodiversity Action Plan, with a presumption against the development”. | Greenwich Biodiversity Action Plan, March 2010 |
| Designated sites                                    | There are two SSSIs in Greenwich Borough  
There are 55 Sites of Nature Conservation Importance in Greenwich                                                                                      | No direct comparators or targets are available.                                                                                                      |             | Core Strategy with Detailed Policies, July 2014                                                                                                                                              |                          |
<p>| Areas lacking                                       | Areas of wildlife deficiency are generally areas                                                                                                     | No direct comparators or targets available.                                                                                                          | There are pockets surrounding Peninsula,                               | Core Strategy With                                                   |                          |</p>
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<td>accessible wildlife sites</td>
<td>more than 1km from a Site of Metropolitan or Borough Importance for nature conservation to which the public has access. Figure 7 in the Core Strategy with Detailed Policies displays the areas of the borough that are more than 1km from an accessible wildlife site.</td>
<td>targets are available.</td>
<td>Woolwich, New Eltham, and stretching from Kidbrooke towards Greenwich where accessibility to Wildlife sites is reduced.</td>
<td>Detailed Policies (July 2014)</td>
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<td>Flood risk</td>
<td>Environment Agency mapping of flood risk shows that the Borough contains areas of floodplain categorised as Flood Zones 2 and 3, the majority of which lie along the Thames waterfront and some along other main rivers. The Borough's strategic flood risk assessment report (2011) also identifies levels of flood risk within the Borough from fluvial, tidal and other sources, to inform spatial planning.</td>
<td>No comparators or targets applicable.</td>
<td>A strategic flood risk assessment report was published by the Council in 2011 to assist the Royal Borough in making spatial planning decisions and inform the Core Strategy.</td>
<td>Environment Agency Flood Mapping: <a href="http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=floodmap&amp;layerGroups=default&amp;lang=_en&amp;ep=map&amp;scale=7&amp;x=531500&amp;y=181500">http://maps.environment-agency.gov.uk/wiyby/wiybyController?topic=floodmap&amp;layerGroups=default&amp;lang=_en&amp;ep=map&amp;scale=7&amp;x=531500&amp;y=181500</a> Royal Borough of Greenwich Strategic Flood Risk Assessment 2011</td>
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<tr>
<td>Land Use</td>
<td>Greenwich  Total area: 4,786ha  % for Domestic Buildings: 8.54%  % for Non Domestic Buildings: 5.05%  % for Road: 14.6%  % for Path: 1.1%  % for Rail: 0.5%  % for Domestic Gardens: 23.2%  % for Greenspace: 34.4%  % for water: 1.7%  % for other land uses: 11%</td>
<td>London  Total area: 159,624ha  Area of Domestic Buildings: 8.7%  Area of Non Domestic Buildings: 4.7%  Area of Road: 12.3%  Area of Path: 0.7%  Area of Rail: 1.1%  Area of Domestic Gardens: 23.8%  Area of Greenspace: 38.2%</td>
<td>The urban fabric of Greenwich is closely aligned with London. There are no significant differences worth commenting on.</td>
<td><a href="http://www.neighbourhood.statistics.gov.uk">www.neighbourhood.statistics.gov.uk</a></td>
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<td>Open Space</td>
<td>Open space constitutes 30% of Royal Greenwich's total area. This equates to a provision of 5.6ha of open space per 1,000 population.</td>
<td>The National Playing Fields Association (now Fields in Trust) established a minimum standard for open space provision (The Six Acre Standard) - 6 acres (2.4ha) of recreational space is required for every 1,000 people.</td>
<td>Royal Greenwich has an extensive and varied provision of open space and recreational facilities. Open space constitutes 30% of Royal Greenwich's total area, ranging from local woodlands to large formal parks. The provision of open space such as at Eltham Common and Greenwich Park contributes to a high quality, attractive environment and has many positive functions. A major swath of open spaces stretching through the central, eastern and southern parts of the Borough forming part of an area of Metropolitan Open Land known as the ‘Green Chain’. The Green Chain stretches through four of South East London Boroughs of Bexley, Bromley, Greenwich and Lewisham and fulfils a variety of functions including recreational, ecological, historical, amenity and physical breaks in the urban environment. The high level of growth expected in the borough will create increasing competition for land in Royal Greenwich and open spaces will therefore come under increasing pressure. The heritage value of Royal Greenwich's open spaces should also be considered, including the various registered historic parks and gardens. The Geographical distribution of open spaces in the Borough causes some accessibility issues in certain areas (see</td>
<td>Core Strategy with Detailed Policies, July 2014 Planning and Design for Outdoor Play and Recreation Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard, October 2015</td>
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<td>Areas of Public Open Space Deficiency</td>
<td>Areas deficient in access are deemed to be those that are further than 400m from a local park, 1,200m from a district park and 3,200m from a metropolitan park. Figure 5 in the Core Strategy with Detailed Policies (July 2014) shows that there are areas of the borough that are deficient in access to a local park and district park. Greenwich- Percentage of household with access to: Open Space 82.6 Local parks 31.3 District Parks 48 Metropolitan Park 60.5 Regional Park 0</td>
<td>London- Percentage of household with access to: Open Space 51.5 Local parks 38.3 District Parks 35.6 Metropolitan Park 55.6 Regional Park 26</td>
<td>Provision of new development, particularly residential initiatives may assist in addressing these deficiencies that currently exist.</td>
<td>Core Strategy with Detailed Policies (July 2014)</td>
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<td>Sporting &amp; Leisure Facilities</td>
<td>The Royal Borough has a vast amount of public open space totalling 881.1 hectares. The standard of public open space provision in the Borough is 3.8ha per 1000 population. The Royal Borough's Open Space study found that there are 252 sports pitches throughout the Borough. This includes 173 football pitches, 20 rugby pitches and 25 cricket pitches; all of which are open to the community. In addition to this the Borough has local: • Athletics tracks;</td>
<td></td>
<td>Greenwich Council is currently undertaking further investigations into the provision of sports and leisure facilities within the Borough. The results of this study will be fed into the Sustainability Appraisal. Future planning policy needs to recognise and respond to any community need for additional facilities.</td>
<td>Greenwich Playing Pitch Strategy Report 2015 Royal Greenwich Local Plan: Core Strategy with Detailed Policies – Adopted July 2014</td>
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<td>Walkways and Cycleways</td>
<td>Royal Greenwich has comprehensive network of Greenways allowing traffic-free routes for pedestrians and cyclists. This includes the riverside cycle and walkway that stretches for 13.8km along the Thames, and the 3km 'Ridgeway' above the Thames Outfall Sewer between Plumstead and Thamesmead. New cycle routes are being implemented as part of the Royal Greenwich Cycling Strategy, adopted in April 2014, and a Walking Strategy is also planned. The Cycling Strategy includes developing off-street and on-street networks, including 'primary' routes on main roads in the Borough, providing separation from traffic and pedestrians where possible. In addition there is a fairly extensive network of open spaces within the Borough that form part of the Green Chain walking network that runs from Crystal Palace to Erith and the Thames Barrier to Chislehurst.</td>
<td>Royal Greenwich performs better than average amongst Outer London Boroughs in terms of walking and cycling mode share according to the London Travel Demand Survey produced by TfL.</td>
<td>Royal Greenwich Cycling Strategy 2014 Royal Greenwich Local Implementation Plan for transport 2011</td>
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<td>River Frontage</td>
<td>Greenwich Borough has a long 13km of frontage to the River Thames.</td>
<td>No comparators or targets available.</td>
<td>The Borough’s river frontage is an important community asset that any future policy needs to conserve and enhance. Policy should seek to improve the permeability and integration of the river with regard to existing and new</td>
<td>Greenwich UDP – Adopted July 2006</td>
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<td><strong>CLIMATE CHANGE</strong></td>
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<td>Air quality</td>
<td>There are 9 detailed air quality monitoring sites in Greenwich. These predominantly occur next to major roads in the Borough being:  - GR4 - A210 Bexley Road;  - GR5 - A206 Trafalgar Road  - GR6 - A2 Rochester Way  - GR7 - A2 Blackheath Hill  - GR8 - A206 Woolwich Road  - GR9 - A205 Westhorne Avenue  - GR10 - A206 Plumstead Road  - GR12 - Peartree Way  - GR13 - A206 Plumstead High Street</td>
<td>No comparators of targets applicable.  National air quality standard for NO2 is 40mg/m3 annual average; and Hourly objective of 200mg/m3 not to be exceeded more than 18 times a year.</td>
<td>Greenwich designated the whole of the Borough as an Air Quality Management Area in 2001 and an Air Quality Action Plan was published in 2002.  The Greenwich Peninsula has also been designated as the first Low Emission Zone in the UK.  Since 2002, several Air Quality Action Plan Progress Reports and Air Quality and Screening Assessment reports have been completed.  Future policy needs to recognise the potential impacts that development has on the environment and continue to reduce greenhouse gas emissions and improve air quality.</td>
<td><a href="http://www.royalgreenwich.gov.uk/downloads/183/air_quality_reports">http://www.royalgreenwich.gov.uk/downloads/183/air_quality_reports</a></td>
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<td>Emissions</td>
<td>Greenwich Borough emits 1,004,457 tonnes of CO2 per year comprising the following sources:  - Industry and Commercial - 316,447 t/yr  - Transport - 258,016 t/yr  - Domestic - 429,174 t/yr  The Borough has a total area of 50.44km2 which means that emissions are at a rate of 19,913 tonnes per km2 per annum.</td>
<td>Based on the data, Greenwich produce below the London average for their annual emission rate. This could be due to a variety of factors including the type of land uses in Greenwich, the extent of parkland etc. Whilst this is the case, policy should continue to promote the reduction of local emissions through initiatives such as more sustainable forms of transport and more environmentally friendly development.</td>
<td><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/437384/2005_to_2013_UK_local_and_regional_CO2_emissions_statistical_release.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/437384/2005_to_2013_UK_local_and_regional_CO2_emissions_statistical_release.pdf</a></td>
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<td>2011: 15,090kWh</td>
<td>2011: 16,410kWh</td>
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<td>2012: 14,790kWh</td>
<td>2012: 16,150kWh</td>
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<td>2013: 14,581 kWh</td>
<td>2013: 16,117kWh</td>
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<td>Renewable Energy</td>
<td>In 2001-15 59.12% of waste in the Borough was used to recover electrical energy at the SELCHP incineration facility in Lewisham.</td>
<td>United Kingdom: 2%</td>
<td>The percentage of renewable electricity, nationwide, generated in 2014 accounted for 7% of all energy consumed. This has increased 1.4% from 2013.</td>
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<td>In addition to this, the most promising sources of renewable energy generation are likely to be solar heated hot water, photovoltaic cells, water source heat pumps, and combined heat and power. During 2014 and 2015 9000m2 Solar PV was proposed in planning submissions. A further programme of 1MW of solar panel installations is being investigated for 2016. Additionally, the feasibility of a water source heat pump to provide 1MW of heat for a district heating network is currently being investigated.</td>
<td>Difficult to draw comparisons due to lack of data.</td>
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<td>Waste management</td>
<td>Household waste per capita:</td>
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<td>The Borough is a statutory Waste Disposal Authority (WDA) and forms part of a voluntary grouping of authorities that coordinate their duties under the Environmental Protection Act 1990 in consultation with the Environment Agency.</td>
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<td>381kg in 2012-13</td>
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<td>Much of the borough's new developments are flats, which can present significant challenges with regard to the recycling of</td>
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<td>401kg in 2013-14</td>
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<td>406kg in 2014-15</td>
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<td>% served by kerbside recycling:</td>
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<td>100.0% in 2012-13</td>
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<td>13</td>
<td>100.0% in 2013-</td>
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<td>14</td>
<td>100.0% in 2014-</td>
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<td>15</td>
<td>% of household waste recycled: 24.11% in 2012-</td>
<td>23.39% in 2013-</td>
<td>19.59% in 2014-</td>
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<td>13</td>
<td>15.80% in 2012-</td>
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<td>14</td>
<td>15.32% in 2013-</td>
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<td>15</td>
<td>14.63% in 2014-</td>
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<td>14</td>
<td>% of household waste incinerated: 56.73% in 2012-</td>
<td>53.60% in 2013-</td>
<td>59.12% in 2014-</td>
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<td>15</td>
<td>Incinerated waste in the Borough was used to recover electrical energy at the SELCHP incineration facility in Lewisham.</td>
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<td>No of days per year pollution exceeds the industrial sources. The predominant source</td>
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<td>Under Investigation</td>
<td><a href="http://www.defra.gov.uk">www.defra.gov.uk</a></td>
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<td><strong>governments standards</strong></td>
<td>of air pollution coming from congested roads within the Borough. The monitoring points had the following exceedences for 200mg/1hr (18 allowed per year): For 2014: • GR4 - A210 Bexley Road - 0 • GR5 - A206 Trafalgar Road - 5 • GR7 - A2 Blackheath Hill - 0 • GR8 - A206 Woolwich Road - 26 • GR9 - A205 Westhorne Avenue - 0</td>
<td>None available</td>
<td>Greenwich Borough Council needs to ensure that the setting and integrity of conservation sites and areas of historical significance are preserved and enhanced.</td>
<td>Royal Greenwich Local Plan: Core Strategy with Detailed Policies – Adopted July 2014</td>
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</table>

**CULTURAL HERITAGE AND CHARACTER**

| Number and extent of Conservation Areas | As of 2014 there were 20 Conservation Areas, and a World Heritage Site- the Maritime Greenwich World Heritage Site located within the Royal Borough. The Maritime Greenwich World Heritage Site was inscribed in 1997 and includes the National Maritime Museum, Greenwich Park and some of Greenwich town centre, and has buffer zones on all sides. Historic landscapes also form a key part of Greenwich Borough. There are 4 registered historic gardens and parks within the Royal Borough listed on Historic England's 'National Heritage List for England' and 'Register of Historic Parks and Gardens of special historic interest in England', these being Greenwich Park, Well Hall Pleasance, Eltham Palace and Repository woods. In addition to this, the Countryside Commission has identified the Shooters Hill | None available | Greenwich Borough Council needs to ensure that the setting and integrity of conservation sites and areas of historical significance are preserved and enhanced.                                                                 | Royal Greenwich Local Plan: Core Strategy with Detailed Policies – Adopted July 2014                                                             |

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<td></td>
<td>Ridge area as Heritage Land due to its high landscape value, historic parks, ancient countryside, and nature conservation value.</td>
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<td><strong>Number of listed buildings and proportion at risk</strong></td>
<td>At present there are 566 Heritage Assets on the Statutory List of Buildings of Special Architectural or Historic Interest in Royal Greenwich. 16 of these are considered to be at risk, 4 of which are grade I and II*, which equates to 0.7%. 11 are Grade II secular buildings at risk, which equates to 1.9%.</td>
<td>Nationally, 3.9% of grade I and II* listed buildings (excluding places of worship) are on the Register. In London the percentage is also 3.9% (64 listed secular buildings). 2.6% (428) of London’s grade II listed secular buildings are on the Register.</td>
<td>Royal Greenwich is significantly lower than the national and London averages for Grade I and II* listed buildings at risk, and lower than the London average for Grade II listed buildings at risk. Since 2011 the Royal Borough has reduced the number of its listed secular buildings at risk by 37.5%. Royal Greenwich’s Local Plan encourages the enhancement of the Borough’s heritage assets and in particular its listed buildings at risk, as a stimulus and catalyst for regeneration. The situation regarding Buildings at Risk is stable for existing entries.</td>
<td>Historic England National Heritage List for England, available at <a href="http://www.historicengland.org.uk/listing/the-list/">www.historicengland.org.uk/listing/the-list/</a> New and emerging threats to Heritage at Risk Register, available at <a href="http://www.historicengland.org.uk/advice/heritage-at-risk/search-register/">www.historicengland.org.uk/advice/heritage-at-risk/search-register/</a></td>
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<td><strong>Waterfront and Maritime Environment</strong></td>
<td>The River Thames is a major linear open space that frames some of the Borough's key historic buildings. It is a waterway rich in biodiversity, a transport route, and an archaeological and recreational resource. At 13km, Greenwich Borough has the longest waterfront of any London Borough. This comprises a variety of land uses, extensive areas of environment and historical significance, 6 safeguarded wharves and a well-developed pedestrian walking path along the river frontage.</td>
<td>None available</td>
<td>The waterfront is an area with significant natural and historical attributes including but not limited to Woolwich Royal Arsenal, the Maritime Greenwich World Heritage Site, and strategic open spaces such as Greenwich Park.</td>
<td>GLA Safeguarded Wharves Review, 2011</td>
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<td><strong>Views &amp; Vistas</strong></td>
<td>Greenwich has a number of locally significant views and vistas looking in all directions, 12 such Local Views are identified in the Royal Borough's Local Plan 2014, with others also noted in conservation character area appraisals for the Borough. In addition to this the Royal Borough has 2 of the 26 designated views that are required to be protected by the London Plan, these being the panorama views to central London from Greenwich Park and Blackheath Point. Also protected is the vista from General Wolfe Statue in Greenwich Park to St Paul's Cathedral.</td>
<td>No comparators or target applicable.</td>
<td>Any future policy needs to seek to preserve the existing significant views and vistas within the Borough.</td>
<td>Royal Greenwich Local Plan: Core Strategy with Detailed Policies – Adopted July 2014</td>
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<td>Indicator</td>
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<td><strong>HEALTH &amp; WELL BEING</strong></td>
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<td>Life expectancy at birth</td>
<td>Greenwich (2012-14) Male: 79 yrs Female: 82.5 yrs</td>
<td>England (2012-14) Male: 79.6 yrs Female: 83.2 yrs</td>
<td>Life expectancy in Royal Greenwich remains shorter than the national average. This is true at birth and at age 65, and is true for both males and females. Latest data show that inequalities in male life expectancy between the poorest and the most affluent areas within the Royal Borough is reducing, with male residents of the most deprived areas of Greenwich now expected to live 4.8 years less than the residents of the most affluent areas. Latest figures however show that inequalities in female life expectancy between the poorest and the most affluent areas of the Royal Borough had increased, with female residents of the most deprived areas of Greenwich now expected to live 5.9 years less than female residents of the most affluent areas.</td>
<td>Officer for National Statistics, 2015 Health and Wellbeing Strategy (2015-2018)</td>
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<td>Physically active adults</td>
<td>ARTHUR&lt;br&gt;Proportion of population undertaking physical activity</td>
<td>Greenwich</td>
<td>England</td>
<td>Greenwich is slightly less physically active than the England average in terms of there being a larger proportion of the population participating in less than 30 minutes of physical activity per week.</td>
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<td>Self-Assessed General Health</td>
<td>Greenwich 2011: 83.1% of residents reported that they had &quot;Good&quot; or &quot;Very Good&quot; health</td>
<td>England 2011: 81.4% of residents in England reported that they had &quot;Good&quot; or &quot;Very Good&quot; health.</td>
<td>Greenwich has a higher proportion of residents reporting &quot;good&quot; health than the England average.</td>
<td>ONS Census 2011, QS302EW</td>
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</table>
### Notifiable offences recorded by the police

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<th>Comments/Trends</th>
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<tr>
<td>Greenwich</td>
<td>Total Notifiable Offences – 21,012 offences – 78.2 per 1,000 population</td>
<td>London (Metropolitan Police Service (MPS))</td>
<td>Greenwich has a lower crime rate than in London as a whole: 78.2 compared to 83.1 total notifiable offences Per 1,000 population.</td>
<td>Metropolitan Police Service (2014/15)</td>
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<td>Violence Against The Person – 6,835 offences (3.5% of MPS total)</td>
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<td>Within Greenwich &quot;Violence against the person&quot; represents the largest number of offences.</td>
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<td>Robbery – 439 offences (2.0% of MPS total)</td>
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<td>Burglary in a Dwelling – 1,283 offences (2.7% of MPS total)</td>
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<td>Theft of a Motor Vehicle – 604 offences (2.7% of MPS total)</td>
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<td>Theft from a Motor Vehicle – 1,476 offences (3.0% of MPS total)</td>
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<tr>
<td>London (Metropolitan Police Service (MPS))</td>
<td>Total Notifiable Offences – 708,896 offences – 83.1 per 1,000 population</td>
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<td></td>
<td>Violence Against The Person – 197,434 offences</td>
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<td>Robbery – 21,906 offences</td>
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<td>Burglary in a Dwelling – 47,335 offences</td>
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<td>Theft of a Motor Vehicle – 22,051 offences</td>
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<td>Theft from a Motor Vehicle – 49,929 offences</td>
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**Deprivation**

2015 rankings for Greenwich (out of 326 LAs - 1 = most deprived):
- Average deprivation score – 78th most deprived LA in England.
- Income scale – 40th most deprived LA in England
- Employment scale – 51st most deprived LA in England

2010 rankings for Greenwich (out of 326 LAs - 1 = most deprived):
- Average deprivation score – 28th most deprived LA in England
- Income scale – 39th most deprived LA in England
- Employment scale – 51st most deprived LA in England

Greenwich’s deprivation score rankings suggest that the levels of deprivation in the borough have improved since 2010.

Greenwich has seen the greatest improvement in deprivation ranking in London, and is the 14th most deprived London borough.

**The English Indices of Deprivation (2010 & 2015)**

### POPULATION & GROWTH

**Population and net population flows**

The Royal Borough population is anticipated to grow by 79,455 people between 2011 and 2041 from 255,483 to 334,938 – accounting for the 9th largest population increase across London boroughs.

Peninsula ward is expected to see the largest population increase - an increase of over 35,000 residents, ranking it 3rd in London.

Between 2011 and 2041 London’s population is estimated to increase by approximately 2.14 million people. The largest growth is expected to occur in Tower Hamlets (140,787 people), Barnet (128,408 people) and Newham.

The borough's population is forecast to grow by 31% between 2011 and 2041, which is above the London average (26%).

Greater London Authority 2014 SHLAA Population.
Woolwich Riverside is also expected to see significant population increases with 18,940 new residents.

The age cohorts estimated to see the largest increase in numbers are 65-74 (12,100 people), ages 75-89 (11,140 people) and ages 55-59 (7,920 people), which is likely to significantly impact health provision.

Between 2011 and 2041 the 4-10 age group will increase by 5,280 and 11-15 by 3,900, placing additional pressure on primary and secondary school provision.

### Population Density

- **Greenwich** has a population density of 53.8 people per hectare.
- **London** has a population density of 52 people per hectare.

Greenwich has a higher population density than London, placing additional pressure on primary and secondary school provision.

### Resident Age Profile

- **Greenwich**
  - 0 to 5 yrs: 24,831 (9.8%)
  - 6 to 15 yrs: 30,563 (12.0%)
  - 16 to 24 yrs: 32,908 (12.9%)
  - 25 to 44 yrs: 87,698 (34.5%)
  - 45 to 64 yrs: 52,441 (20.6%)
  - 65+ yrs: 26,116 (10.3%)
  - All Ages: 254,557

- **London**
  - 0 to 5 yrs: 8,5%  
  - 6 to 15 yrs: 11.3%
  - 16 to 24 yrs: 12.3%
  - 25 to 44 yrs: 35.5%
  - 45 to 64 yrs: 21.2%
  - 65+ yrs: 11.1%
  - All Ages: 8,173,941

Greenwich has a very similar age profile to that of the rest of London. Greenwich has a higher proportion of younger residents, and slightly less older residents.

### Resident Ethnicity

- **Greenwich (2011)**
  - 62.5% White
  - 11.7% Asian / Asian British
  - 19.1% Black / African / Caribbean / Black British
  - 4.8% Mixed / Multiple Ethnic Groups
  - 1.9% Other Ethnic Groups

- **London (2011)**
  - 59.8% White
  - 18.5% Asian / Asian British
  - 13.3% Black / African / Caribbean / Black British
  - 5.0% Mixed / Multiple Ethnic Groups
  - 3.4% Other Ethnic Groups

Greenwich has a higher proportion of White residents than London as a whole, with 37.5% of the population from a Black, Asian and Minority Ethnic (BAME) background, compared to 40.2% for London.

As a proportion of the population, Greenwich has a higher proportion of...
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<td>Religion</td>
<td>Greenwich</td>
<td>London</td>
<td>residents from Black / African / Caribbean / Black British background, but fewer residents from an Asian / Asian British background. Despite this from 2001-2011 the largest growth has occurred amongst the South Asian, Other Black and Other White groups.</td>
<td>ONS Census 2011, QS208EW</td>
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<td>Christian 52.9%</td>
<td>Christian 48.4%</td>
<td>Greenwich has a higher proportion of Christians and people stating &quot;No Religion&quot; than London as a whole, but a lower proportion of Hindu's, Jews and Muslims.</td>
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<td>Buddhist 1.7%</td>
<td>Buddhist 1.0%</td>
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<td>Hindu 3.6%</td>
<td>Hindu 5.0%</td>
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<td>Jewish 0.2%</td>
<td>Jewish 1.8%</td>
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<td>Muslim 6.8%</td>
<td>Muslim 12.4%</td>
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<td>Sikh 1.4%</td>
<td>Sikh 1.5%</td>
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<td>Other Religion 0.4%</td>
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<td>No Religion 25.5%</td>
<td>No Religion 20.7%</td>
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<td>Religion Not Stated 7.6%</td>
<td>Religion Not Stated 8.5%</td>
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<td>TRANSPORT</td>
<td>Greenwich</td>
<td>London</td>
<td>The Borough is well connected by overland rail and bus services which are reflected in the proportions shown. Almost double the proportion of journeys to work are made my train compared to the average work journey in London. Whereas there are proportionately less work journeys made in Greenwich by underground etc. compared to London possibly due to there being only one underground station in the borough (North Greenwich) despite the 5 DLR stations also present. Car use represents accounts for a lower proportion of journeys to work than</td>
<td>ONS, 2011 Census, Method of Travel to Work (QS701EW)</td>
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<td>Transport modes to work</td>
<td>Work Mainly at or From Home: 2.5%</td>
<td>Work Mainly at or From Home: 3.3%</td>
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<td>Underground, Metro, Light Rail, Tram: 9.7%</td>
<td>Underground, Metro, Light Rail, Tram: 14.7%</td>
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<td>Train: 14.8%</td>
<td>Train: 8.7%</td>
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<td>Bus, Minibus or Coach: 10.2%</td>
<td>Bus, Minibus or Coach: 9.2%</td>
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<td>Taxi: 0.3%</td>
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<td>Motorcycle, Scooter or Moped: 0.7%</td>
<td>Motorcycle, Scooter or Moped: 0.8%</td>
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<td>Driving a Car or Van: 17.5%</td>
<td>Driving a Car or Van: 18.3%</td>
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<td>Passenger in a Car or Van: 1.2%</td>
<td>Passenger in a Car or Van: 1.1%</td>
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<td>Bicycle: 1.5%</td>
<td>Bicycle: 2.6%</td>
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<td>On Foot: 4.1%</td>
<td>On Foot: 5.8%</td>
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<td>Other Method of Travel to Work: 0.6%</td>
<td>Other Method of Travel to Work: 1.1%</td>
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<td>Not in Employment: 36.9%</td>
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<tr>
<td>Percentage of households with a car</td>
<td>Greenwich: 58%</td>
<td>Work: 0.5% Not in Employment: 34.6%</td>
<td>London as a whole, as does bicycle and on foot modes.</td>
<td>ONS, 2011 Census, Car or Van Availability</td>
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<td>London: 58.4% of households in London have access to at least one car or van, compared to the national average being 74.2%.</td>
<td>The proportion of the population able to access a vehicle in Greenwich is similar to that seen in London but less than the national average.</td>
<td>(QS416EW)</td>
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<td>HOUSING</td>
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<tr>
<td>Housing tenure</td>
<td>Greenwich</td>
<td>London</td>
<td>Greenwhich is generally consistent with the rest of London with regard to the proportion of people who currently own their homes or are in the process of paying them off.</td>
<td>ONS, 2011 Census, Tenure - Households</td>
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<td></td>
<td>Owned outright: 16,585 (16.4%)</td>
<td>Owned outright: 21.1%</td>
<td>However, the Borough has a significantly higher percentage of Council rented homes in comparison to London although this compensates for the lack of privately rented accommodation.</td>
<td>(QS405EW)</td>
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<td>Owned with a mortgage: 27,134 (26.9%)</td>
<td>Owned with a mortgage: 27.1%</td>
<td>Policy needs to ensure the improvement of housing standards within the Borough.</td>
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<td>Shared ownership: 1,580 (1.6%)</td>
<td>Shared ownership: 1.3%</td>
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<td>Social Rented: 34,662 (34.3%)</td>
<td>Social Rented: 24.1%</td>
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<td>Private Rented: 20,004 (19.8%)</td>
<td>Private Rented: 25.1%</td>
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<td>Living Rent Free: 1,080 (1.1%)</td>
<td>Living Rent Free: 1.3%</td>
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<td>All Households: 101,045</td>
<td>All Households: 3,266,173</td>
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<tr>
<td>Average house prices</td>
<td>Greenwich (2014) Median Dwelling Price: £315,000</td>
<td>London (2014) Median Dwelling Price: £365,000</td>
<td>Greenwich is one of the cheaper locations in London to purchase a dwelling with average prices almost £50,000 below the London average, but above the national average.</td>
<td>Average House Prices, Ward, LSOA, MSOA</td>
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<tr>
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<td>England (2014) Median Dwelling Price: £198,000</td>
<td>England (2014) Median Dwelling Price: £198,000</td>
<td>The data used is relatively dated and should be reviewed prior to the Sustainability Appraisal being undertaken.</td>
<td>published by GLA</td>
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### Households

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<td>London (2011)</td>
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<tr>
<td>Measuring our Data/Statistics</td>
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</table>
### Indicator of Homelessness Numbers

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<tbody>
<tr>
<td>Number of homeless households: 364 (0.3% of all households)</td>
<td>Number of households homeless: 17,530 (0.5% of all households)</td>
<td>The proportion of homeless households in Greenwich is below the London average.</td>
<td>Table 784: Local Authority Summary: Local authorities’ action under the homelessness provisions of the 1985 and 1996 Housing Acts (financial year) Local authority, 2014-15 R.</td>
<td></td>
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<tr>
<td>Homeless households in temporary accommodation: 397</td>
<td>Homeless households in temporary accommodation: 48,240</td>
<td>43% of gross completed dwellings have been affordable.</td>
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<tr>
<td>LA Dwellings let to Homeless households in Priority Need: 75</td>
<td>LA Dwellings let to Homeless households in Priority Need: 5,430</td>
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</table>

### Economy

#### Employment

<table>
<thead>
<tr>
<th>Employment by</th>
<th>Greenwich</th>
<th>London</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Usual Residents aged 16-74: 186,722</td>
<td>All Usual Residents aged 16-74: 6,117,482</td>
<td></td>
</tr>
<tr>
<td>Economically Active: 132,073 (70.7%)</td>
<td>Economically Active: 71.7%</td>
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<tr>
<td>Full-time: 71,844 (38.5%)</td>
<td>Full-time: 39.8%</td>
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<tr>
<td>Part time: 20,697 (11.1%)</td>
<td>Part time: 10.9%</td>
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<tr>
<td>Self-employed: 18,305 (9.8%)</td>
<td>Self-employed: 11.7%</td>
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<tr>
<td>Unemployed: 11,518 (6.2%)</td>
<td>Unemployed: 5.2%</td>
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<tr>
<td>Student: 9,709 (5.2%)</td>
<td>Student: 4.1%</td>
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<tr>
<td>Economically Inactive: 54,649 (29.3%)</td>
<td>Economically Inactive: 28.3%</td>
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<tr>
<td>Retired: 15,695 (8.4%)</td>
<td>Retired: 8.4%</td>
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<tr>
<td>Student: 13,957 (7.5%)</td>
<td>Student: 7.8%</td>
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<tr>
<td>Looking after home/family: 9,577 (5.1%)</td>
<td>Looking after home/family: 5.2%</td>
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<tr>
<td>Long term sick or disabled: 8,621 (4.6%)</td>
<td>Long term sick or disabled: 3.7%</td>
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<tr>
<td>Other: 6,799 (3.6%)</td>
<td>Other: 3.2%</td>
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</table>

The Economic Activity rate in Greenwich is slightly below the London average. Greenwich has a slightly higher unemployment rate than London as a whole.

Greenwich is generally consistent with the ONS, 2011 Census, Economic Activity (QS601EW).
<table>
<thead>
<tr>
<th>Indicator</th>
<th>Data/Statistics</th>
<th>Comparators</th>
<th>Comments/Trends</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sector</td>
<td>A Agriculture, Forestry and Fishing: 0.1% B Mining and Quarrying: 0.1% C Manufacturing: 3.0% D Electricity, Gas, Steam and Air Conditioning Supply: 0.3% E Water Supply; Sewerage, Waste Management and Remediation Activities: 0.5% F Construction: 7.4% G Wholesale and Retail Trade; Repair of Motor Vehicles and Motor Cycles: 12.2% H Transport and Storage: 5.0% I Accommodation and Food Service Activities: 6.7% J Information and Communication: 5.0% K Financial and Insurance Activities: 7.7% L Real Estate Activities: 1.8% M Professional, Scientific and Technical Activities: 8.1% N Administrative and Support Service Activities: 6.9% O Public Administration and Defence; Compulsory Social Security: 6.5% P Education: 10.2% Q Human Health and Social Work Activities: 12.0% R,S Arts, Entertainment and Recreation; Other Service Activities: 6.1% T Activities of Households as Employers; Undifferentiated Goods - and Services - Producing Activities of Households for Own Use: 0.2% U Activities of Extraterritorial Organisations and Bodies: 0.2%</td>
<td>A Agriculture, Forestry and Fishing: 0.1% B Mining and Quarrying: 0.1% C Manufacturing: 3.2% D Electricity, Gas, Steam and Air Conditioning Supply: 0.3% E Water Supply; Sewerage, Waste Management and Remediation Activities: 0.4% F Construction: 6.6% G Wholesale and Retail Trade; Repair of Motor Vehicles and Motor Cycles: 13.1% H Transport and Storage: 5.0% I Accommodation and Food Service Activities: 6.3% J Information and Communication: 6.9% K Financial and Insurance Activities: 7.7% L Real Estate Activities: 2.0% M Professional, Scientific and Technical Activities: 10.9% N Administrative and Support Service Activities: 5.9% O Public Administration and Defence; Compulsory Social Security: 5.0% P Education: 9.6%</td>
<td>employment characteristics of London. However the following industries do differ the most from the London average: *J Information and communication (1.9 percentage points lower in RBG compared to London) *M Professional, Scientific &amp; Technical activities (2.8 percentage points lower in RBG) *O Public Administration and Defence, Compulsory Social Security (1.5 percentage points more in RBG) *Q Human Health and Social Work activities (1.3 percentage points more in RBG)</td>
<td>Industry (QS605EW)</td>
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<tr>
<td>Indicator</td>
<td>Data/Statistics</td>
<td>Comparators</td>
<td>Comments/Trends</td>
<td>Source</td>
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</table>
| Socio-economic classification     | Greenwich All Usual Residents Aged 16 to 74: 186,722                            | Q Human Health and Social Work Activities: 10.7%  
R, S Arts, Entertainment and Recreation; Other Service Activities: 5.9%  
T Activities of Households as Employers; Undifferentiated Goods - and Services - Producing Activities of Households for Own Use: 0.3%  
U Activities of Extraterritorial Organisations and Bodies: 0.2%                                                                 | Greenwich has a lower proportion of people in the upper socio-economic classification such as people in higher managerial or professional occupations, and exhibits a higher percentage of people working in the lower supervisory and routine occupations. Greenland has a student population directly comparable to that of London.                                                                 | ONS, 2011 Census, NS-SeC (QS607EW)                                      |
|                                  | London All Usual Residents Aged 16 to 74: 6,117,482                            |                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                           |                                                                      |
### APPENDIX A3 – Summary of Consultation Responses to Draft IIA Scoping Report

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comments Submitted</th>
<th>Updates to Scoping Report</th>
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<tbody>
<tr>
<td>1. Environment Agency</td>
<td>The following documents should also be included:</td>
<td>The recommended documents have been considered and added to Table 3.</td>
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<tr>
<td></td>
<td>• Thames Estuary 2100 (TE2100 plan)</td>
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<td>• Thames River Basin Management Plan (RBMPs) (October 2015)</td>
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<td>• Port of London Authority Plan (PLA)</td>
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<td></td>
<td>• Thames Estuary 2100 (TE2100) briefing for Royal Borough of Greenwich</td>
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<td>• Estuary Edges Guidance</td>
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<td>• Green Capital Green Infrastructure for a Future City (2016)</td>
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<tr>
<td>2. Historic England</td>
<td>The following document should also be included:</td>
<td>The recommended document has been considered and added to Table 3.</td>
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<td>• Historic England Guidance on Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2016)</td>
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<td>3. Natural England</td>
<td>Natural England has confirmed that it does not wish to</td>
<td>None required.</td>
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<tr>
<td>4. Charlton Community Gardens</td>
<td></td>
<td>A section has been added following the compatibility matrix seeking opportunities to integrate objectives with policies where the objectives have potential for incompatibility. Appendix A1 includes all relevant plans and policies that are currently in force. It includes several transport policies and the Greenwich Equality Policy.</td>
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<tr>
<td>• Charlton Community Gardens objects to the separation of environmental, economic and social impacts within the objectives.</td>
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<tr>
<td>• The compatibility matrix does not attempt to integrate objectives and actions.</td>
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<tr>
<td>• Appendix A1 should be updated to include a transport policy or a fair wage strategy.</td>
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