

LONDON BOROUGH OF NEWHAM

Sustainability Appraisal of the draft Canning
Town and Custom House Supplementary
Planning Document

June 2008

Contents

- 1 Introduction
- 2 The approach to the sustainability appraisal
- 3 Scoping
- 4 The Sustainability Framework
- 5 Key sustainability issues in Canning Town and Custom House
- 6 Alternatives
- 7 Sustainability appraisal – general approach
- 8 Summary of sustainability appraisal of development principles / standards and proposals
- 9 Identification of impacts and opportunities for mitigation
- 10 Conclusions

1 Introduction

- 1.1 This document reports on the sustainability appraisal of the Supplementary Planning Document on Canning Town and Custom House (June 2008) – the SPD. The SA is being prepared on behalf of the London Borough of Newham, by consultants Baker Associates. It is intended to provide an examination of whether implementing the SPD would help deliver development in Canning Town and Custom House that is compatible with objectives of sustainable development.
- 1.2 The overall purpose of the SPD is to set out the matters identified in the Canning Town and Custom House Framework – Stage 1 (June 2008) (the masterplan framework) as part of the development plan for Newham. The SPD will be a material consideration in making decisions on planning applications within the area it covers. Although it should be noted that implementation will be reliant on the relevant saved policies of the existing Newham Unitary Development Document, London Plan and national planning guidance.
- 1.3 The sustainability appraisal (SA) of the SPD is being carried out in order to help create a more sustainable plan. This report documents the likely sustainability implications of the SPD. It follows on from an earlier SA of the draft SPD that was consulted on alongside the SPD. Few comments were received on the SA and where suitable these have been integrated into this revised SA, see Appendix 4. This final SA Report details likely sustainability implications of the SPD.
- 1.4 From the outset of the sustainability appraisal, it is clear that the intention of the SPD is to help achieve more sustainable development in this area, as is the role of good planning. This can be achieved, for example, through the provision of affordable homes, community facilities, and better connections within the area. Therefore this sustainability appraisal considers not only the coverage of matters relating to sustainable development, but also whether the approach taken in the SPD will be the most effective approach in helping to achieve these aims. This will be both through the overall approach to the regeneration and redevelopment of Canning Town and Custom House, but also to check whether the approach presented is likely to be workable and therefore can be successfully implemented to secure the desired benefits.

2 The approach to the sustainability appraisal

- 2.1 Sustainability appraisal is required of the draft Canning Town and Custom House SPD prior to adoption as full SPD under the regulations of the Planning and Compulsory Purchase Act 2004. With Strategic Environmental Assessment (SEA) of certain plans and programmes also required by the European Directive EC/2001/42. The approach taken to the SA in this case is to ensure that there is a thorough investigation of the sustainability implications of implementing the SPD, whilst ensuring the scale and nature of the appraisal is in keeping with the role and function of the SPD. The aim of which is to meet the SEA and SA requirements through a common process with common reporting – jointly known as an SA.

- 2.2 This pragmatic and combined approach does not mean that the SA and findings will be compromised. The appraisal approach remains thorough and robust, based on the particular needs and characteristics of the area.
- 2.3 Although both the SA and the SPD have been prepared by Baker Associates the SA has been prepared independently from the SPD with different consultants involved in the two processes. This is essential in providing a proper test of the planning document as it is only through being removed from the process of preparation is it possible to give a full critical analysis of the approach followed, and the identification of possible weakness or gaps. Although, there have been discussions between those undertaking the SA and those preparing the SPD to allow sustainability matters to be incorporated into the SPD through more informal feedback of ideas, the fuller SA reported here was only undertaken following preparation of a full draft of the document.
- 2.4 The method of sustainability appraisal uses the framework of sustainability objectives as the basis for assessment of the effectiveness of the SPD. Using these objectives as a general description of what more sustainable development means in the regeneration area, it is possible to consider whether the SPD is helping to make a contribution to more sustainable development. A commentary based appraisal approach has been carried out, discussing each development principle, development standards and proposals in turn to consider its possible implications of implementation on sustainable development.
- 2.5 A draft SA Report was prepared to accompany the Canning Town and Custom House SPD to public consultation, and it itself was open to comment. There was only one respondent to the SA specifically and the comments received, and the SA response, are shown in Appendix 4. This SA Report is the final version, taking into account consultation comments and changes made to the SPD as a result of the consultation exercise.

3 Scoping

- 3.1 The SA process began with the initial stage of preparing a scoping report by which included the collection on information and sustainability matters that characterise Canning Town, Custom House and Stratford Island as they are now, as well as plans for the future of these area. The preparation of a scoping report is a statutory requirement of The Environmental Assessment of Plans and Programmes Regulations, 2004 (commonly known as the SEA Regulations).
- 3.2 This scoping report was prepared by Newham Borough Council, rather than Baker Associates, as it drew from work already completed by the Council. A joint approach to scoping was carried out alongside the work for Stratford Island Development Framework. Although a specific Canning Town and Custom House Development Framework SPD sustainability appraisal scoping report has been produced.
- 3.3 The purpose of the scoping report was to allow certain consultees, defined in the SEA Regulation, to comment on the proposed coverage and approach to the SA. The Scoping Report was put out to consultation on the 23 November

with a statutory five week consultation period finishing 2 January 2008. Few comments were received, however where these were they have been incorporated in the SA where appropriate. They have also be viewed by the SPD preparation team and again ideas incorporated where necessary. A copy of the scoping report and draft SA Report for consultation can be found on the Newham planning policy website at :

www.newham.gov.uk/services/localdevelopmentframework/.

- 3.4 The scoping report provides background material essential to this SA, including details of the current sustainability baseline in the area, covering environmental, social and economic issues in the Borough. It also contains a review of other plans and programmes in the area that will have to be taken into account in the SA and the approach to SPD. The initial sustainability framework is also part of this document; see section 4 of this SA Report. It is therefore an essential companion report to this SA Report, and makes up part of the overall reporting for the SA.

4 The Sustainability Framework

- 4.1 The purpose of establishing a Sustainability Framework is to define and clarify what sustainability development means in relation to the SPD and how it can guide development implementation in the area. The framework consists of a set of objectives, these have been finalised following input at scoping consultation stage. The framework was developed in house by the officers from the local authority and then subject to consultation and verification at the Scoping Consultation. The framework has now been adopted for use in this appraisal stage.

The proposed Sustainability Framework

- 4.2 The Sustainability Framework consists of eighteen headline sustainability objectives, as shown in table 1. These cover the environmental matters as required by the Schedule 2 of the SEA Regulations, as well as social and economic matters relating to the wider sustainability agenda. Appendix 1 shows the expanded sustainability framework that includes additional criteria and indicators. The criteria give examples of the measures that the SPD could take to help meet the objective to allow greater understanding of how the objective relates to real world development. These are supported by suggested indicators that could be used to monitor progression towards meeting the objective, although this may not be an exhaustive list.

Table 1: Sustainability Framework developed for the sustainability appraisal process showing the eighteen objectives for sustainable development

No.	Objective
1	To protect, maintain and enhance the quality of Newham's open space , to create new open spaces as appropriate, and ensure that access to open space and the wider realm is enhanced.
2	To increase safety and security and reduce crime and fear of crime .
3	To minimise pollution levels and emissions of greenhouse gases.
4	To provide the opportunity for people to meet their housing needs.
5	To protect and enhance social and community facilities and provide access to key services for all residents in the Borough.

6	To tackle deprivation and social exclusion whilst promoting social inclusiveness and equality.
7	To improve the health of Newham residents, reduce health inequalities and promote healthy living.
8	To provide opportunities for rewarding and satisfying employment and improve access to skills and knowledge.
9	To encourage and accommodate sustainable economic growth and the indigenous economy and potential inward investment.
10	To reduce the amount of waste requiring final disposal through waste minimisation and to increase in order of priority, the proportion of waste reused, recycled, composted and recovered.
11	To substantially increase energy efficiency and the proportion of energy both purchased and generated from renewable and sustainable sources.
12	To minimise flood risks , including fluvial, stormwater, surface and tidal flooding.
13	To secure high quality urban design and promote sustainable design and construction techniques in conjunction with more efficient and sustainable resource use and reuse.
14	To reduce the need to travel and increase the proportion of journeys made by more sustainable forms of transport.
15	To reduce water use and improve surface and ground water quality.
16	To maximise land use efficiency and ensure that new development occurs on brownfield land and that contaminated land is remediated as appropriate.
17	To protect and enhance existing biodiversity and natural habitats and create new habitats.
18	To conserve and enhance the character and appearance of the historic environment , areas of local or landscape distinctiveness and features of cultural and archaeological importance.

Using the sustainability framework in the appraisal

- 4.3 The objectives are used in this SA as the basis for considering the coverage of issues by the SPD. The purpose of which is to use them as a standard definition of what sustainable development is for development in Newham, relevant to the SPD. The objectives are cross referenced with the principles and proposals of the SPD to look for instances where it is likely these would help meet the sustainable development objectives, where there may be conflict with objectives and where there is the possibility for improvement or change to the SPD to help achieve greater benefits for sustainability.
- 4.4 It may be important to reflect at this stage that the appraisal process does not restrict itself solely to considering the coverage of issues and whether this appears appropriate for more sustainable development. In this case the sustainability appraisal must also give consideration to how effective the SPD is likely to be in securing the implementation of the principles and proposals to actually achieve the desired aspects of sustainability. Therefore the appraisal also considers matters such as the clarity of wording and the basis for standard charges verify that the SPD will serve its purpose as a useful and workable way of achieving more sustainable development.

5 Key sustainability issues in Canning Town and Custom House

5.1 In addition to the information gathered in the baseline report it is also worth identifying the main sustainability issues (both positive and negative) in the area to be taken into account in preparing the SPD, and therefore should also be part of the SA. These have been identified as:

- pedestrian links and connections are poor with the area dominated by streets and roads that favour car use and therefore may reduce the safety for pedestrians and cyclists. Poor pedestrian and cycle connectivity from residential areas to Canning Town centre is a particularly significant issue due to the severance caused by the A13. Good pedestrian and cycle links to Custom House and Canning Town station are also lacking.
- the employment provision in the area is poor with a lack of diversity in the available local jobs, with several of the industrial areas facing pressure from housing development.
- the housing stock in the area is overrepresented by social rented homes and lacks diversity and a range of housing tenures.
- there are limited shopping facilities in the area and vacancy has shown an increasing trend.
- there is under provision of public open space in the area and does not meet defined standards for provision.
- there is little biodiversity within the regeneration area.
- the urban environment is lacking distinctive quality both in the quality of existing housing stock and the domination of the area by trunk roads and major rail infrastructure.
- the entire area is in flood zone 3 which is a high risk zone, although flooding defences mitigate this risk.
- the area is well linked to public transport including bus services, the underground at Canning Town and the Docklands Light Railway at both Canning Town and Custom House station.
- the area contains some established and long existing communities, particularly among more elderly residents.
- the regeneration area is surrounded by areas of high economic growth and regeneration such as nearby Canary Wharf, area surrounding the City Airport and the London Olympics 2012 sites – regeneration of Canning Town and Custom House have the potential to tap into this.

6 Alternatives

- 6.1 It is an important component of the SA to consider what the relative sustainability implications would be of pursuing an alternative approach to the planning for Canning Town and Custom House. In this case there are several alternative approaches that could have been adopted.
- 6.2 The decision was made to proceed with producing the Canning Town and Custom House SPD. The main alternative would be not to produce the SPD and instead rely on the saved policy of the UDP, the forthcoming LDF and the existing Canning Town and Custom House Supplementary Planning Guidance (2004).
- 6.3 This alternate approach however, is unlikely to be able to deliver development suitable to meet the needs of the area, with negative implications for achieving more sustainable development. Preparation of this SPD allows for several benefits in terms of implementing development:
- guidance can be tailored to the needs of these neighbourhoods of the London Borough of Newham, instead of relying on generic policy approaches of the adopted UDP, London Plan or national policy
 - SPD can provide guidance in the short-term as the document has a relatively brief preparation time when compared to the time taken to adopt relevant policies of the LDF, therefore enabling development in the area to take a joined up approach with a single vision almost straight away
 - the SPD provides for up-to-date guidance, replacing the old Canning Town Supplementary Planning Guidance that, although a useful guide, does not represent the agreed on and most current advice on how development should proceed in this area. The SPD also allows for planning policy covering this area to be moved forward, in much as is possible prior to completion of the LDF, in order to incorporate recent approaches advocated for sustainable development such as higher density development or higher standards for sustainable construction.
- 6.4 The preparation of the SPD is constrained in the alternatives it can consider by the work already completed on the Canning Town and Custom House Framework – Stage 1 Report (June 2007). The preparation of the masterplan framework included working with the community and stakeholders directly, and collating the work already completed on projects that make up part of the masterplan proposals, and have been subject to their own consultation events. Therefore by the stage of preparing the SPD it is no longer appropriate to start again at an options stage where alternatives for development schemes are considered. However the approach taken to the SPD has been to take only those elements of the masterplan framework forward in detail that link to the planning process.

7 Sustainability appraisal – general approach

- 7.1 The task for the SPD is to take forward the proposals and approach developed through the master planning process for the Canning Town and Custom House area. The development of this SPD should help ensure that these approaches achieve the additional weight afforded by being part of the development plan for the Newham as the SPD will need to be considered as a material consideration in deciding planning applications in the area.
- 7.2 In order for any sustainability benefits to be realised from this SPD it will need to be ensured that the guidance and proposals set out are sufficient to allow those using the SPD to get a clear understanding of how and where development should proceed and to what standards. If the SPD is not successful in this even where there are good intentions to achieve more sustainable development, the benefits will not be realised.

Policy framework

- 7.3 For this SPD the situation is constrained in part by the process and timing of this document. The SPD has been produced to implement the masterplan framework and ensure that the approach advocated within that plan has the status of a formal planning document that can be used to help make decisions. However the content of the SPD is not policy and therefore for successful implementation needs to be set around a framework of existing policies that cover the SPD area.
- 7.4 At the current time the most locally relevant policies are from the saved policies London Borough of Newham Unitary Development Plan (adopted in 2001 with policies saved/deleted September 2007). Unfortunately the preparation of these policies significantly predate the Canning Town and Custom House Framework and therefore although useful in implementing general aspects of development, such as helping to ensure good design they provide no up-to –date locally specific policy on how regeneration and renewal will happen in the area following the outcomes of the Canning Town and Custom House Framework.
- 7.5 In terms of sustainability this means that there may be difficulties in ensuring the SPD has sufficient influence over development in the area in order to secure the benefits anticipated through the masterplan framework. For instance where there is no site specific masterplan, planning application approach or commitment to development according to masterplan site specific principles the SPD may not have the weight needed to ensure development proceeds according to the good practice approach advocated.
- 7.6 Following completion of the emerging Core Strategy and other relevant policy of the Local Development Framework drawing on the masterplan framework the SPD will need to be reviewed to reflect new policy approach. This is likely to be beneficial in better realising the sustainability objectives of the SPD, by providing a more relevant and specific policy framework on which to base the planned regeneration of the area. However, it is also noted here that is definitely advantageous to have this SPD despite limitations, in place now rather than wait for the new development plan policy, as this allows an interim approach to the delivery of development in the Canning Town/Custom House

area that allows a cohesive overview of how regeneration should be delivered. It also has an invaluable role in setting out the criteria on what is expected from new development that will be part of the material considerations when making decisions on the suitability of planning applications.

- 7.7 It has been identified that there is the potential for a policy conflict to arise between this SPD and a planning document prepared by the London Thames Gateway Development Corporation. The 'Lower Lea Valley Opportunity Area Framework' sets a framework for development that covers a large area encompassing all of the Canning Town and Custom House SPD area. As Newham have not adopted the proposals and policies of this framework document there is the risk that these could conflict with the Canning Town and Custom House SPD; this may impact on the implementation of the schemes and regeneration proposals. These impacts on deliverability may adversely affect the potential to achieve suitable sustainable development in keeping the strategy and timeframes of the SPD. It therefore may be necessary to identify and resolve any potential conflicts at the earliest opportunity to avoid

Layout of the SPD

- 7.8 The SPD has two main sections the first covering the generic approach to new development in Canning Town and Custom House, and contains very little that is geographically specific. The second section contains details of the specific sites for development and details of the proposed approach to the regeneration and renewal at these locations.
- 7.9 The clarity of the approach in the SPD may have been improved by some rearrangement and reorganisation of the way that development principles and development standards are presented to give clear and unambiguous advice for those using the SPD. The principles are taken directly from the masterplan framework and are more geographically specific than the standards (but this is not always the case). There is not always a clear division over what matters appear under which headings, and in some instances there are repetitions, particularly between standard 1 and principles 3 and 5.
- 7.10 The effectiveness of the delivery of development could be made clearer links between the implementation sections of delivering development and engaging communities.
- 7.11 The use of graphics through the SPD help add clarity to the approach that is to be followed, such as the need for greater linkages and the overall approach to the spatial distribution and focus of new development.

8 Summary of sustainability appraisal of development principles / standards and proposals

- 8.1 In order to help identify what the sustainability implications may be of the approaches proposed in the SPD, sustainability appraisals were carried out of the individual development principles, design standards and site specific

proposals. These appraisals are shown in full in Appendix 2 and 3, with this section covering some overarching themes that arise from SA of the SPD.

- 8.2 The approach taken to the appraisal of development principles and standards summarises the overall aim for each issue – in order to clarify what is being appraised. There is then a comparison of each issue to the objectives developed for the SA to identify where there may be sustainability implications, positive and negative. Finally there is a summary of findings and where relevant recommendations are made on possible changes or additional consideration that could be included to improve the sustainability performance of the SPD.
- 8.3 For the site specific proposals the approach to SA is slightly different and is presented more as a commentary based on sustainability, again using the sustainability objectives for the SA. This includes those elements of sustainability where the proposed development may have an impact and also recommendations to improve sustainability performance.
- 8.4 Considering the development principles and development standards it is evident that there is a commitment to bringing improvements to the regeneration area. Major benefits will be achieved through:
- **improving links and connectivity** – by promoting an approach that helps achieve better pedestrian links within the residential area and to mixed use areas a variety of sustainability benefits can be achieved. These include helping to create equitable access to services that does not prioritise car drivers. Helping to encourage people out of their cars especially for local trips with benefits in terms of air pollution, climate change, energy resources and health. Promotion of walking as exercise can also directly improve health. New routes will also be safer particularly where separated from roads and developed in association with design that promotes natural surveillance and good quality lighting.
 - **urban design** – the redevelopment of the area has the opportunity to bring significant enhancements to the currently lower quality urban environment. The design of new buildings can take advantage of the new open space in creating new views and vistas in the area, as well as creating unique neighbourhoods. Sustainability benefits are in terms of urban fabric, the landscape and may help community cohesion through improving the value people have for the place where they live. Where suitable protecting the existing local urban character will be essential in maintaining and strengthening peoples' links to the place where they live.
 - **improved service and retail centres** – enhancing the current neighbourhood centres at Canning Town and Custom House can help bring significant benefits to the area in terms of providing services in locations that are already highly accessible. This can have sustainability benefits relating to reducing the need to travel, reducing social inequalities and encouraging community cohesion and reducing social exclusion.
 - **new housing** – the provision of a large amount of new housing can help meet the diverse needs of the area, this includes size of homes from large family to single person homes. In addition it includes a range of tenures to create greater diversity in the communities of the area and may help to

support a greater range of services, including retail and restaurants.

- **higher densities** – development that makes good use of land through promoting high densities has clear advantages for the related sustainability objective. In addition, putting the highest densities in accessible locations supports the approach in reducing car use by ensuring services and public transport nodes are a walkable distance from peoples' homes.
- **protecting employment land** – employment land should be protected for this use in the area in order to provide local jobs that are geographically accessible to local people, with the benefit of reducing the need to travel and reducing social exclusion.
- **encouraging inward investment** – promoting the area through an improved urban quality and range of housing could help achieve greater levels of inward investment in the area, that although geographically well placed and accessible has missed out on much of the economic growth of surrounding areas.
- **pollution** – the approach put forward seek to reduce air pollution and noise pollution impacts by ensuring new development in areas where this may be an issue, such as adjacent to roads and rail lines, will be subject to suitable assessment.
- **resource use** – the approach includes some provision for reducing resource use in new development, although this could be enhanced with further detail or cross reference to relevant guidance

9 Identification of impacts and opportunities for mitigation

- 9.1 In addition to the matters covered in section 8 it may be useful to consider the following matters where the SA identifies the need for careful implementation, or additional material to be included in the SPD, in order to ensure negative sustainability impacts are avoided or mitigated against.

Employment strategy

- 9.2 Although employment and the need for economic investment is raised at several instances in the SPD there does not appear to be any clear, overarching strategy for employment in the area. For example the overall expectations for economic growth in the area, such as the need to retain or enhance existing employment space and the type of businesses sought for the area. Without this it may be that the SPD can not be effective in securing suitable economic growth and investment in the area.
- 9.3 The redevelopment may result in the loss of employment land, even where commercial floorspace remains the same. This may impact, positive and negatively, on the character of the area and possible links to the riverside location. In particular preserving existing local employment will be important in terms of meeting existing residents' economic needs and providing accessible jobs that people can walk or cycle to with ease. It is also important

that where it remains the areas historical links to work on the river is retained, including protecting existing wharf uses.

Demolition waste

- 9.4 Although the decision to identify this as an area of housing renewal and therefore beyond the control of the SPD, there may be some residual matters relative to resource use for the SPD to address. This is a result of the large scale demolition and construction involved there will be a great deal of waste produced and it may be suitable for the SPD to set the need to ensure that demolition waste is recycled on-site to make the best use of resources and avoid the transportation and landfill of this bulky waste.

Community impacts of housing renewal

- 9.5 As with waste the decision to renew housing in this area is not a decision made by the SPD. However redevelopment of the area will disrupt existing local communities and may result in some negative effects on the community character or wellbeing of some residents. This may particularly be the case for those who have been living the area for a long time and have strong connections to the place where they live. It may therefore be suitable for the SPD to directly address these matters and how they should be dealt with as part of planning applications.
- 9.6 In addition it will be important to ensure that in the renewal of housing no social market housing availability is lost and that the same numbers that are lost through demolition are replaced through construction. It will also be important to ensure that these are of high quality comparable to other housing types.

More people in the same land area

- 9.7 One of the major impacts to the area will be a result of increasing densities, significant in some locations, will result in more people living in the same are of land. This could have a variety of impacts, including adverse impacts on the already low air quality in much of the regeneration area if this increase is matched by an increase in car use, increased pressure on services including schools, health facilities open space and public transport and changes in some renewal areas a fundamental change in community character – that could be positive or negative. Also the higher densities may put pressure on the room sizes of family homes to be kept to a minimum with impacts on peoples' wellbeing, and new development needs to be delivered to avoid this.
- 9.8 The area regeneration proposals of the second section show that for the majority of the sites it is proposed to develop buildings that are much higher than at present. This is likely to fundamentally change the character of many areas and there is therefore the need to ensure these are of high architectural quality, as well as ensuring there are facilities are in place to meet the needs of future residents or workers in these buildings.
- 9.9 More people can also benefit in terms of support for services that need minimum population catchments, including a range of shops, restaurants and bars. It may also help with the vibrancy of the area and the range of homes helping to create a more mixed area.

New direct routes

- 9.10 The SPD includes proposals for the creation of two new roads that provide direct connections between Canning Town and Custom House centres. If traffic controls are not put in place on these roads, severely restricting vehicle speeds and use of these routes there is a risk that they may become 'rat-runs' through the area – particularly as a result of an increased population in the area. This has the potential for increased pollution impacts in the residential neighbourhoods with health and safety impacts, and run counter to objectives of reducing car use. Therefore clear prioritisation needs to be given to walking, cycling and public transport on these routes in the design guides or development produced covering these routes.

Open space

- 9.11 Existing housing stock in the area is characterised by houses and flat of up to around four stories in height. The majority of these have private gardens giving many residents their own private open space. New proposals put an emphasis on public rather than private open space. This has positive and negative impacts on sustainable development, with larger public open spaces better for recreation and urban character, and can be useful as community meeting spaces. However the loss of private gardens may mean less private space for safe and secure activities that enhance well-being such as relaxing, gardening and children's play.
- 9.12 In planning open space, it needs to be remembered the variety of benefits open space can bring to the area and the sustainability objectives it can help meet, from biodiversity to the impacts of climate change, so that they can be incorporated in this space.

Biodiversity

- 9.13 Biodiversity resources are very low in the area and every attempt needs to be made to ensure enhancements are integrated into all new development, no matter the existing biodiversity quality of the site. Reference to the Bow Park EcoPark should help in delivering specific benefits for the natural environment. This should include careful planting choices and management of parks and open space. In particular the redevelopment of the Limmo site needs to ensure that any biodiversity that has colonised the area is retained and enhanced as necessary, as this could be one the greatest undisturbed wildlife assets in the area. Attempts should be made to identify, protect and enhance Biodiversity Action Plan habitats and species wherever they are found, addressing specific targets.

Climate change

- 9.14 The SPD could incorporate additional criteria on the ways that development in the area would help address climate change mitigation and adaptation through layout and urban design, and community schemes for energy. Although energy use is covered to some extent through the SPD and regeneration masterplan increased emphasis could be put on the possibility of schemes such as community combined heat and power generation to be integrated into new residential development. Also the way that development can adapt to climate impacts should be referred to, such as the use of planting in public areas used as shading to mitigate against high summer

temperatures, and the way pocket parks can reduce heat island effects in very urbanised areas. In addition to the way buildings are designed and located to avoid 'wind tunnel' effects created near tall buildings.

Built heritage

- 9.15 It is noted that the area contains little built heritage of suitable quality to be statutorily protected. However, it may be important for the SPD to clearly identify this, and ensure any buildings of local merit are preserved where appropriate given the overall lack of heritage value. In addition it may be suitable for proposals to consider where more modern buildings may have future heritage value of buildings and taking this into account where suitable in redevelopment plans.

Flooding

- 9.16 The issue of flooding covers the entire regeneration area, as it is flood zone 3 putting it at high risk of flood. Despite this being mitigated for to some extent by London flood defences it may be suitable to set out more in a more integrated way in the SPD how flood should be addressed through new development.

Possible conflicts in meeting sustainable development objectives

- 9.17 It may be that the approaches put forward although having some positive sustainability benefits for some matters can have negative impacts on others. Examples include:
- seeking to avoid development that puts vulnerable people in flood risk areas it may be that Lifetime homes standards cannot be met that would see ground floors of buildings available as homes for those with mobility difficulties.
 - increasing densities creating additional pressures on the area impacts on communities and related services, and the ability to provide a sufficient number and size of family homes
 - providing more public open space may impact on the ability to provide private open space.

10 Conclusions

- 10.1 The SA of the SPD that reveals that overall it is likely that the implementation of the SPD would have positive benefits for the Canning Town and Custom House Area, meeting a range of sustainable development objectives.
- 10.2 In terms of successful implementation, the SPD sets out in a clear and concise way the approach that should be taken to development in the regeneration area. Although the SA does raise some issues in relation to the need to avoid overlap and ensure that the SPD sets out clear messages for development.

- 10.3 Key benefits for sustainability come from the regeneration of the urban environment to promote high quality urban design that create a better place to work and one that people choose to invest in. Benefits could come from a greater range of available housing, including new market housing as well as replacement of social housing, to bring greater diversity in the communities of the area.
- 10.4 The approach also focuses strongly on the need to improve pedestrian and cycle links and connections in the area to help encourage people out of their cars, as well as creating greater equity of access that does not require people to drive to reach the services and facilities they need. This is supported by improved neighbourhood and district services providing a mix of uses including shops, offices and housing in locations that are already accessible by public transport and where pedestrian access is to be improved.
- 10.5 The SA does raise some issues where there will be sustainability benefits so long as they are carefully implemented. This includes the increase in housing density meaning that more people will live in the area, creating vibrancy and supporting new shops and services, but also changing the character of the area and needing high quality design solutions to avoid adverse impacts of overdevelopment.
- 10.6 There will also be a change in the way open space provided, and it is likely that more open space will be larger public space with a reduction in private spaces. Although this will create the opportunity to secure high quality community resources that can have a variety of sustainability benefits.
- 10.7 In addition some clarity may need to be added on what the economic and employment goals are for the area, and the extent to which Canning Town and Custom House will be the focus of economic growth in Newham
- 10.8 However, whatever is contained in the SPD is only as successful as its implementation, and it is not up to the SPD alone to ensure that high quality and more sustainable development is delivered. It will be planning decisions relating to a range of other strategies and programmes and commitment from the Council, developers and local people amongst others who will help deliver the regeneration needed and more sustainable development in Canning Town and Custom House.

Appendix 1

Sustainability appraisal of proposals

Objective	Criteria	Indicators
To protect, maintain and enhance the quality of Newham's open space , to create new open spaces as appropriate, and ensure that access to open space and the wider realm is enhanced.	a) will it act to protect and enhance neighbouring park and open space areas? b) will it ensure easy accessibility to open space? c) will it create a variety of functional open space to meet community and environmental needs? d) will it improve opportunities for recreation and play?	<ul style="list-style-type: none"> • Percentage of planning permissions for major development including provision for off-site environment and transport improvements to the adjacent street scene, public open space or transport network. • Amount of open space per 1000 residents. • Areas of deficiency in access to open space.
To increase safety and security and reduce crime and fear of crime .	a) Will it reduce actual levels of crime? b) Will it reduce the fear of crime and make local people feel safer in their community/neighbourhood? c) Will it improve environmental safety (street lighting, visibility etc.)? d) Will it avoid the creation of isolated places during day and night? e) Will it improve safety for children and young people? f) Will it create safer walking routes to key areas? g) Will it improve road safety and reduce the incidence of accidents?	<ul style="list-style-type: none"> • Total crime (Focus pg 85) • Worry about crime (WAVE pg 98)
To minimise pollution levels and emissions of greenhouse gases.	a) Will it reduce the number of days where air pollution is higher than the national standard? b) Will it reduce the amount of pollution to air? c) Will it reduce emissions of greenhouse gases by reducing energy consumption? d) Will it reduce emissions of ozone depleting substances? e) Will it encourage demand for locally produced products and services?	<ul style="list-style-type: none"> • Air quality exceedence with regard to ozone (O₃) and particulate matter (PM₁₀) • Air quality with regard to ozone (O₃), nitrogen dioxide (NO₂), sulphur dioxide (SO₂), carbon monoxide (CO), particulate matter (PM₁₀) • Number of noise nuisance complaints.

	<p>f) Will it reduce carbon emissions by reducing energy consumption and incorporating sustainable design measures?</p> <p>g) Will it reduce the impact of light pollution?</p> <p>h) Will it reduce the impact on development noise (construction and demolitions)?</p> <p>i) Will it reduce the impact of noise from traffic and transport?</p> <p>j) Will it reduce the impact of noise from the night time economy or heavy industry?</p> <p>k) Will it reduce the impact of odour?</p> <p>l) Will it improve river water quality?</p> <p>m) Will it improve ground water quality?</p>	
To provide the opportunity for people to meet their housing needs.	<p>a) Will it increase the range and affordability of housing for all social groups within the Borough?</p> <p>b) Will it reduce homelessness and decrease overcrowding?</p> <p>c) Will it reduce the number of unfit homes?</p>	<ul style="list-style-type: none"> • Percentage of new affordable housing available for Newham residents • Housing condition • House prices
To protect and enhance social and community facilities and provide access to key services for all residents in the Borough.	<p>a) Will it encourage engagement in community activities?</p> <p>b) Will it increase satisfaction with local services?</p> <p>c) Will it improve the range of key services within easy access of the population?</p> <p>d) Will it improve access to cultural, recreational and leisure facilities?</p> <p>e) Will relevant facilities be developed concurrently with new residential development?</p>	<ul style="list-style-type: none"> • Location of leisure centres, libraries and parks in Newhama
To tackle deprivation and social exclusion whilst promoting social inclusiveness and equality.	<p>a) Will it reduce deprivation and social exclusion in those areas most affected?</p> <p>b) Will it improve social cohesion?</p> <p>c) Will it improve the range of employment opportunities?</p>	<ul style="list-style-type: none"> • Index of Multiple Deprivation

	<p>d) Will it foster a sense of pride in the neighbourhood?</p> <p>e) Will it respond to community needs and desires?</p>	
<p>To improve the health of Newham residents, reduce health inequalities and promote healthy living.</p>	<p>a) Will it reduce health inequalities?</p> <p>b) Will it improve access to primary healthcare facilities?</p> <p>c) Will it encourage healthy lifestyles and provide the necessary facilities to promote this, such as open spaces, sport facilities and active travel (walking and cycling)?</p>	<ul style="list-style-type: none"> • General practitioner (average GP list size) • Location of Primary Health Services • Life Expectancy
<p>To provide opportunities for rewarding and satisfying employment and improve access to skills and knowledge.</p>	<p>a) Will it provide employment opportunities for the local community?</p> <p>b) Will it provide employment opportunities for the local community?</p> <p>c) Will it improve the qualifications and skills of the local community, particularly young people?</p> <p>d) Will it increase learning participation and adult education?</p> <p>e) Will it help improve earnings?</p> <p>f) Will it reduce unemployment?</p> <p>g) Will it reduce long-term unemployment?</p> <p>h) Will it provide jobs at higher skill levels?</p> <p>i) Will it improve the range of employment opportunities?</p> <p>j) Will it reduce poverty and help improve earnings?</p>	<ul style="list-style-type: none"> • Employment deprivation by SOA (Super Output Area) • Unemployment rate inc long term
<p>To encourage and accommodate sustainable economic growth and the indigenous economy and potential inward investment.</p>	<p>a) Will it encourage indigenous business?</p> <p>b) Will it encourage inward investment?</p> <p>c) Will it make land and property available for business and development?</p> <p>d) Will it encourage new and improve business development and opportunities?</p> <p>e) Will it improve the resilience of businesses and</p>	<ul style="list-style-type: none"> • The percentage of new businesses surviving three years after start up

	<p>the economy?</p> <p>f) Will it promote growth in key sectors or clusters?</p> <p>g) Will it enhance the image of the area as a business location?</p> <p>h) Will it improve job density?</p> <p>i) Will it reduce skill shortages?</p> <p>j) Will it reduce poverty and help improve earnings?</p> <p>k) Will it encourage economic diversification and inward investment?</p> <p>l) Will it reduce unemployment overall as well as long-term employment?</p> <p>m) Will it provide job opportunities and improve quality of life to the most deprived sections of the community?</p> <p>n) Will it improve business development and resilience, and enhance business competitiveness?</p>	
<p>To reduce the amount of waste requiring final disposal through waste minimisation and to increase in order of priority, the proportion of waste reused, recycled, composted and recovered.</p>	<p>a) Will it lead to reduced consumption of material and resources?</p> <p>b) Will it reduce waste creation and increase waste recovery and recycling?</p> <p>c) Will it encourage the re-use and recycling of demolition and construction waste including aggregates?</p> <p>d) Will it reduce household waste?</p> <p>e) Will it reduce hazardous waste?</p>	<ul style="list-style-type: none"> • Amount of waste by type – household, commercial, municipal. • Household recycling rates.
<p>To substantially increase energy efficiency and the proportion of energy both purchased and generated from renewable and sustainable sources.</p>	<p>a) Will it lead to an increased proportion of energy being met from renewable sources?</p> <p>b) Will it increase energy efficiency?</p>	<ul style="list-style-type: none"> • Renewable energy generated as a percentage of total energy supplied. • Energy efficiency.
<p>To minimise flood risks, including fluvial, stormwater, surface and tidal flooding.</p>	<p>a) Will it minimise the risk of tidal and fluvial and watercourses) flooding to people and property?</p> <p>b) Will it reduce the risk of damage to property from</p>	<ul style="list-style-type: none"> • Number of planning consents granted against Environment Agency advice on flooding issues (Higher Level Target 5)

	storm events, including surface water flooding and discharges?	<ul style="list-style-type: none"> • SUDS Number of new planning consents with Sustainable Urban Drainage Systems or rainwater collection • Number of planning applications where the FRA has been approved by the Environment Agency • Number of developments set back from water courses
To secure high quality urban design and promote sustainable design and construction techniques in conjunction with more efficient and sustainable resource use and reuse.	<p>a) Will it encourage the sustainable development of buildings, including preparing for the impacts of climate change?</p> <p>b) Will it improve the functionality and form of urban spaces?</p> <p>c) Will the relationship between buildings and pedestrians be enhanced?</p>	<ul style="list-style-type: none"> • The level achieved of the Code for Sustainable Homes and/or BREEAM for new developments. • Proportion of new planning consents with green/brown roofs • Proportion of new planning consents incorporating passive solar design.
To reduce the need to travel and increase the proportion of journeys made by more sustainable forms of transport.	<p>a) Will it improve accessibility to work and services by public transport, walking and cycling?</p> <p>b) Will it reduce the effect of traffic congestion on the economy and the wider road network?</p> <p>c) Will it facilitate efficiency in freight distribution?</p>	<ul style="list-style-type: none"> • Length in km of designated walking and cycling network • Modal split (including journeys to work)
To reduce water use and improve surface and ground water quality.	<p>a) Will it reduce water consumption and improve efficiency of consumption?</p> <p>b) Will it meet the requirements of the Water Framework Directive?</p> <p>c) Will it adopt SUDS and water conservation techniques?</p>	<ul style="list-style-type: none"> • Average per capita water consumption • Ecological and chemical status of water bodies • Proportion of new planning consents incorporating water conservation techniques (NIF??) • Number of planning consents with SUDS • Meeting the
To maximise land use efficiency and ensure that new development occurs on brownfield	<p>a) Will it reduce the amount of derelict land?</p> <p>b) Will it improve the landscape quality and</p>	<ul style="list-style-type: none"> • Previously developed land (brownfield sites) that is used or may be available for

<p>land and that contaminated land is remediated as appropriate.</p>	<p>character of the area? c) Will it remediate contaminated land?</p>	<p>redevelopment as a percentage of the local authority land area.</p>
<p>To protect and enhance existing biodiversity and natural habitats and create new habitats.</p>	<p>a) Will it conserve and enhance natural / semi-natural habitats and Sites of Nature Conservation Importance? b) Will it conserve and enhance species diversity, and in particular avoid harm to protected species? c) Will it provide opportunities for biodiversity or create habitats? d) Will it improve the landscape and ecological quality and character of the area and/or maintain and enhance the integrity and interconnectivity of sites with nature conservation interest? e) Will it encourage protection of trees?</p>	<ul style="list-style-type: none"> • Total area of Sites of Nature Conservation Importance of good and/or improving quality • Percentage of new developments with biodiversity enhancement • Number of planning applications that provide significant buffer strip adjacent to watercourse for habitat creation. • Area of new habitat managed as well as existing wildlife sites (could include living roofs) • Number of developments with appropriate on site conservation or mitigation measures to seek no net loss of biodiversity value • Achievement of BAP targets.
<p>To conserve and enhance the character and appearance of the historic environment, areas of local or landscape distinctiveness and features of cultural and archaeological importance.</p>	<p>a) Will it protect and enhance sites, features and areas of historical, archaeological and cultural value? b) Will it maintain the visual character of the area? c) Will key views and relationships be preserved and enhanced? d) Will it conserve and enhance the local distinctiveness of the area? e) Will it conserve and enhance features of cultural importance?</p>	<ul style="list-style-type: none"> • Number of and percentage (of the total) of Listed Buildings on the Buildings at Risk Register. • Number of and percentage (of the total) of Monuments on the Buildings at Risk Register

Appendix 2

Sustainability appraisal of development principles and development standards

Development Principles

Development Principle 1: Making New Connections

Aim: It has been identified that there are many barriers to movement around the area, particularly in relation to the severance of pedestrian links of residential areas to mixed use areas, and in joining up Custom House and Canning Town centres. Therefore following this principle aims to address these issues through the creation of two new streets through the area, using existing roads and the creation of linking routes as part of new development – the Residential Spine and Activity Street.

Sustainability:

1 Open space

These routes would encompass new parks and landscaping and should help improve access and availability of communal outdoor spaces.

2 Crime and fear of crime

It is envisaged that these routes would be created to include natural surveillance and be the focus of activity, this may have benefits for reducing crime and fear of crime

3 Pollution

By promoting walking and cycling it is hoped that levels of road pollution can be reduced in the area. Although the new linking routes will also be available for general traffic, and there is the possibility that these new routes – as they will provide direct links will increase traffic levels in residential areas, reducing air quality.

5 Social and community facilities; 6 Deprivation and social exclusion

The new routes should help improve access to community and other facilities, including shops, by means other than by car and therefore help create equity of access for all. The new routes should provide safe and direct walking routes to central areas and the Activity Street should contain a mix of community uses. If new bus services are provided also these key links this would also improve access to local services.

7 Health

As with the pollution objective there is the possibility that these routes could increase through traffic in residential areas unless carefully controlled, with implications for health related to vehicle emissions.

There may also be health benefits relating to improved routes for walking and access to open space created by these improvements to the urban environment.

13 High quality urban design

This approach promotes high quality urban design through the creation of high quality routes through the area, aiming to create two very different by high quality movement corridors.

14 The need to travel

Although this scheme does not necessarily reduce the need to travel in general it may help promote use of car alternative, including walking and cycling.

Summary and recommendations:

Although useful in providing more coherent links through the area and focus for new community facilities, for example, along Activity Street, it may be useful to clarify how these linked routes will ensure that pedestrian use is prioritised and they do not increase the overall levels of traffic through the mainly residential parts of the area. Also it may be suitable to address through the principle the importance of pedestrian movements and links as part of the design and thinking behind all new development in the area.

Development Principle 2: Link Canning Town to surrounding area**Aim:**

This principle is a continuation of that under principle 1, although in this case it is the connections to the wider London area that are addressed. This is primarily through pedestrian links out of the area addressing current barriers to movement, this including links over and under the A13, and access routes to the rivers as a recreational resource.

Sustainability:**3 Pollution**

By promoting walking and cycling it is hoped that levels of road pollution can be reduced in the area. New pedestrian links over road and rail barriers should help make choosing not to use a car a viable alternative to car use.

5 Social and community services; 6 Deprivation and social exclusion; 8 Employment

Improving pedestrian movement routes around the area should help equitable access to community facilities, services and jobs by prioritising high quality and safe pedestrian routes to travel out of the area.

7 Health

Promoting walking can help improve the health of residents, for instance the recreational routes along the Thames. Improving the safety of these routes, for example separation from roads will also have sustainability benefits relating to health.

14 The need to travel

Although this scheme does not necessarily reduce the need to travel in general it may help promote use of car alternative, including walking and cycling.

Summary and recommendations:

This approach should have positive benefits in helping open out the regeneration area to the wider Newham area, making walking a real alternative to car use and thereby ideally reducing car travel and associated impacts.

There are no recommendations for change.

Development Principle 3: Create distinct and unique residential areas**Aim:**

The purpose of this principle is to help deliver a high quality mix of residential housing types in the regeneration area, that reflect the type of housing and the characteristics of the location. The principle also covers issues relating to creating a mix of housing types and tenures to meet the range of needs in the area.

Sustainability:

2 Housing

Clearly one of the main sustainability objectives that this principle addresses is the need to provide a range of homes for existing and future residents of the area. This will seek to accommodate more homes in the same area, increasing the amount of housing available for first time buyers and others on lower incomes as well as private market housing.

The approach also addresses the varying needs for new homes in terms of size in order to accommodate the diverse needs of residents, this includes those with larger families to single person households.

13 High quality urban design

The whole approach here is to create a diverse range of high quality residential neighbourhoods to create unique places that together make a distinctive and quality area. Taking precautions in the density of development, so the quality of the urban environment is not compromised and the form of development fits its setting, following principle 8.

16 Use land efficiently

The approach advocated here is to see land better used in the regeneration area by increasing residential density to accommodate more homes per hectare.

Summary and recommendations:

If successfully implemented the proposed approach could help significantly improve the quality of the urban environment in the regeneration area, creating unique pockets of high quality design. This should also provide a mix of new homes to meet the diverse needs of households in the area.

It is vital that at least the same quantity of social affordable housing is included in the redeveloped site as is currently available. This is in order to ensure the overall housing stock of this type of home (the most affordable available) is not reduced in the area or in Newham as a whole, and that no household is left without affordable housing following redevelopment.

Development principle 4: New hearts for Canning Town centre and a Custom House centre

Aim:

This principle is made up of two components that set out what will be expected from development in the main district and local centre of the regeneration area. This seeks to enhance the quality, in terms of design, the range and quantity of services in the two 'centres' of the regeneration area. This would see the town centre as a focus for new mixed use development. There would be an emphasis on creating mixed use areas that are people friendly prioritising connections and pedestrian use.

Sustainability appraisal:

1 Open space

The plans for this area incorporate public open spaces, such as public squares and spaces, and therefore should help meet this objective.

2 Crime and fear of crime

Improvements to these areas include a mix of uses quality design and better connections that may help reduce crime and fear of crime in these locations.

3 Pollution

The regeneration of these centres to include new space for shops and services and a mix of uses should help to reduce the need to travel by providing services at a walkable distance for residential areas. If this is effective in it could help reduce local as well as global air pollution and climate impacts.

4 Housing

Housing will be integrated into new mixed use schemes, including flats about shops. This will help in meeting housing needs in the area.

5 Social and community facilities; 7 Health

These areas are proposed as mixed use and should contain various community resources, such as health centres and libraries. Providing these in accessible location should help to meet health and social and community needs.

6 Deprivation and social exclusion

Providing these mixed use centres at node points that are accessible on foot, by bicycle and by public transport should help to ensure that community facilities, shops, services as well as jobs are equally accessible by all parts of the community. Although given the location of both these 'centres' at the very north western and south eastern corners of the regeneration area means that there may still be access issues (particularly by foot) for the geographically central residential areas.

8 Employment; 9 Economic growth

The approach here would be to support a mix of uses in this location and this includes new office space. Providing space for new jobs in the regeneration area should help access to employment. Creating higher quality mixed use centres may also enhance the character of the area and ideally make it a place where people are more willing to invest in.

14 Reduce the need to travel

The approach here is to improve local services so people need not travel out of their neighbourhood to meet their day to day needs. The approach also supports using public transport through ensuring these centres are integrated with rail connections, both existing and planned. The proposed Residential Spine and Activity Street will also link more directly the two centres and the residential core that should aid pedestrian access to these mixed use centres.

16 Land use efficiency

High densities will be promoted in these areas making the more efficient use of land. Care will need to be taken to ensure that this is a high quality and helps enhance the area.

Summary and recommendations

Overall this approach should have positive benefits for the local community by supporting the creation a wider range of local facilities that are accessible by foot. This should also help in meeting objectives for sustainable development that would see fewer trips made by car. Higher density development will need to be undertaken in a way that enhances the local character.

There are no recommendations.

Development principle 5: Focus on street character and secure design

Aim:

This approach relates to how new and existing streets will be enhanced to ensure that they add to the character and quality of the area, as well as helping to create safer routes.

2 Crime and fear of crime

The approach here is to reinforce the importance of street design in reducing opportunities for crime and reducing the aspects of the urban environment that increase fear of crime. This includes natural surveillance and good quality street lighting.

3 Pollution; 7 Health; 14 Reducing the need to travel

This principle does not put emphasis on the need to prioritise new streets for pedestrians, cycling or public transport. Addressing this could help reduce the need to travel and the opportunities to encourage less people to use their cars to travel around the area, with benefits in for resource consumption, pollution and health.

13 High quality urban design

The approach here should encourage good design in the appearance and layout of new development by helping to create high quality streets. This includes the use of public art, planting, and paving.

Summary and recommendations:

As it stands now it is likely the greatest benefits for sustainability of this principle would come from improving the quality of the urban environment, with benefits also related to risk and fear from crime.

Greater emphasis could be included on this section on the importance of identifying suitable roads, or stretches of roads, where traffic calming could be implemented to give priority to pedestrians. This could have benefits of improve open space availability for residents and improvements could help encourage walking and reduce the need to travel by car, with pollution, resource use and health benefits.

Development principle 6: Make accessible and enjoyable waterfronts

Aim:

To improve access to the river Lea as a recreational resource, including the creation of riverside parks and walkways.

1 Open space

This principle addresses public open space directly with the possibilities of creating new public outdoor space and walkways along the River Lea.

7 Health

The provision of new open space and walkways for could help improve the health of residents by allowing space for informal recreation.

13 High quality urban design

Opening up river frontages and peoples' access to the river could help bring benefits to the urban environment character.

Summary and recommendations

This should have positive benefits in terms of providing a recreational resource for residents, as well as the potential for positive benefits for the urban environment.

Development principle 7: Secure open space

Aim:

This principle covers a range of issues, from using landscaping to create a more visually attractive area and retention of views, the provision of open space and the potential to enhance local biodiversity.

1 Open space

The principle directly relates to matters of open space, such as the need to upgrade Keir Hardie park, as well as the need to provide smaller public and semi-public outdoor spaces.

5 Social and community facilities; 6 Deprivation and social exclusion

Outdoor recreation spaces are an essential community resource, therefore it is hoped that by upgrading existing facilities and enhancing others could improve access across the regeneration area to public open space. Sports grounds resources can also be useful locations for improving social cohesion through sporting and other events.

7 Health

Providing equitable access to health facilities can have definite advantages for the health of local residents.

12 Flood risks; 13 Water

Landscaping is suggested as a way of reducing the risk of flood through managing surface water.

13 High quality urban design

This principle promotes the use of landscaping to improve the visual quality of the urban area.

17 Biodiversity

Issues of biodiversity are covered under this principle, it may be suitable to include details of specific sites or BAP habitats in need to enhancement or protection.

Summary and recommendations:

Although this principle is useful in setting out the need for general improvements to open spaces and using planting to improve the appearance of the regeneration area the approach does try and cover a very wide range of issues under a single heading. This approach may be misleading as the issues addressed are quite diverse and may not always be compatible. With issues such as visual appearance emphasised, as well as the practical use of open space for recreation or in habitat creation.

Ideally it would be preferable to have to have open space and park issues separate from landscaping or biodiversity.

Development principle 8: Create appropriate density

Aim:

This principle further highlights the density requirements of principles 3 and 4, in order to help meet Newham's housing targets.

1 Open space

There is a risk that creating development at too high a density means that private and public open space provision is reduced, therefore implementation needs to ensure adequate open space is provided. The principle highlights the possibility of creating roof terraces and balconies, in addition to ground level gardens.

3 Pollution; 7 Health; 14 The need to travel; 15 Deprivation and social exclusion

Providing the highest density housing in locations that are close to public transport nodes and a range of services should help reduce the overall need to travel to meet basic needs. In particular these can be met by walking and cycling only, reducing the negative sustainability impacts of car use, including on health, pollution and natural resource use.

4 Housing

Increasing density should help increase the overall provision of homes in the area. The range of size and tenures that will be provided should help meet the diverse needs of existing and future residents. Care will need to be taken to ensure increasing densities does not cause a decrease in the floorspace of new homes, and all new development is of sufficient dimensions suitable for the needs future households.

12 Flood risk; 15 Water use

There is a possibility that higher density development will increase the land area that is covered by hard and impermeable surfaces, which raises the risk of flood by changing the way that storm water can drain from the area. Therefore consideration will need to be given to how run-off times can be reduced through schemes such as green roofs and sustainable drainage systems.

13 High quality urban design

Developing at very high densities runs the risk of creating a poor quality urban environment and the provision of homes that are size contained. Therefore in implementing this approach, particularly at very high densities, every attempt is made to ensure design is of the highest possible standards.

16 Land use efficiency

This approach is clearly compatible with the more efficient use of land.

Summary and recommendations

The approach will have clear benefits in the efficient use of land, as well as helping improve the density of residents to better support local services. There may also be benefits in helping not to increase the need to travel by locating the highest densities near public transport nodes and existing and planning locations of new services.

In implementing the policy care will need to be taken to ensure that these densities will only be delivered in developments of high design quality and that new homes have suitable floorspace and room size to meet the needs of future households. In addition new development will need to include suitable sustainable drainage systems to ensure the increased densities do give rise to increased flood risk.

Development standards

Development Standard 1: Ensuring quality design

Aim: This is a broad approach setting the urban design standards that will apply to all new development in the regeneration area, with the aim of enhancing the area and bringing benefits to future residents.

1 Open space

The criteria include the need to ensure spaces are of high quality and well maintained

2 Crime and fear of crime

The criteria include the need to take into account safety in new development

3 Pollution; 6 Deprivation and social exclusion; 7 Health; 14 The need to travel

Criteria include that new development should be designed to make moving around the area, particularly by foot, more straightforward and therefore may encourage more trips to be made by foot, with benefits in terms of health and reducing air pollution. In addition ensuring the area is well linked through safe and direct pedestrian routes should help all have access to the services they need without the need drive or pay for public transport.

9 Economic growth

Improving the visual character of the area may help secure benefits in terms willingness to invest and businesses to locate in the area.

11 Energy efficiency

The approach includes the need to maximise energy conservation that should help meet this objective – although this does repeat matters found in development standard 4.

13 High quality urban design

This standard specifically relates to the need to ensure new development contributes to the quality of the urban environment, not only in terms of the quality of individual buildings but also in urban design and the relationship of the buildings and their surroundings. The need to protect local identity is also key to preserving peoples' connection with the area in which they live, taking heed of not only the historic environment but also the positive aspects of the local character.

Summary and recommendations: This approach has clear and direct relationship with the objectives for sustainable development. The approaches aim to not only create a more visually attractive urban environment, but also to create a better and safer place to live and one that helps encourage more sustainable ways of living. This includes encouraging more trips to be made by foot or bicycle, that may help reduce the negative impacts from increased car use.

Although there are clear positive messages for sustainable development, it is not clear that this standard needs to be presented as a separate issue from the development principle, such as principles 2 and 3 that cover similar matters.

Development standard 2: Addressing flood risk

Aim: This standard follows an approach to require development in the area to undertake Flood Risk Assessment to guide the form and suitability of development given that the area is in flood zone 3 and there is at risk of flooding.

7 Health

Protecting residents from the risk of flood with have clear benefits for health and safety.

12 Flood Risks

The purpose of this standard directly relates to this objective for sustainable development.

Summary and recommendations

There is the possibility that this requirement, and the Flood Risk Assessments undertaken, may lead to some types of development not being delivered, with possible impacts on the meeting the needs of existing and future residents. However if this were to be the case it would mean that the safety of residents was also being protected, with clear benefits.

Development standard 3: Minimising use of our resources

Aim:

The aim of this approach is to reduce the impact on new development on natural resources, in addition to other environmental matters such as noise impacts and provision of utility services.

3 Pollution; 7 Health; 15 Water; 16 Use land efficiently

The approach advocates an approach that ensures air quality is taken into account in new development, particularly in AQMA, to reduce the risk of health impacts on residents and to help avoid increasing effects. The impacts of noise pollution are also a consideration and relevant development needs to show how this will be handled in new development.

Contaminated land requirements should also mean that these areas have suitable remediation prior to redevelopment, thereby helping to protect the health of local residents and water pollution impacts.

10 Waste

Incorporating space in new development for the separation and storage of recyclable wastes is essential in helping reduce it being sent to landfill and to protect minimum resources.

This approach could be improved by addressing the large amounts of waste that will be created through the demolition and clearance of existing buildings. There should be a requirement to ensure that as much of this waste as possible is reused on-site as part of redevelopment to avoid wasting resources and the need to transport and landfill of bulky wastes.

11 Energy efficiency

Requirements here suggest that energy use in new buildings be taken into account and renewable sources used wherever possible in line with London wide targets. The standard also recognises the importance of helping to mitigate against climate change and this is associated with reducing energy use from carbon resources.

13 High quality urban design

This standard recognises the importance of design in adapting to climate change impacts; this can help create better quality places to live. It may have been suitable to include the use of planting and landscaping in reducing heat island effects through natural shading.

15 Water

The approach includes the need to reduce the use of water on site, including reducing potable water by installing grey water systems within new development.

Summary and recommendations

This approach will have clear benefits in terms of helping deliver development that creates less impact on the environment, particularly in terms of natural resources (although not solely which could be reflected in a change to the title of the standard).

It may be useful to set out any policy backing that the criteria of the standards may have to increase the effectiveness of implementation. It may also be suitable in considering waste to include requirements to ensure the best use is made demolition waste by ensuring it is recycled as aggregate in new development. For climate change additional information on adaptation may be beneficial.

Development standard 4: Sustainable transport

Aim:

The approach here is to set out the ways in which it is expected that regeneration and redevelopment will help encourage people to move away from car use, promoting alternative modes.

3 Pollution; 5 Social and community services; 7 Health; 14 The need to travel

This standard should help encourage people away from being reliant on their car to access services by limiting parking. This may have positive environmental impacts relating to reducing car use and in addition may help encourage developers to ensure that their development is accessible by a variety of modes and thereby helping promote equitable access.

Summary and recommendations

This approach forms a useful part of a strategy to reduce car dependence; however it is only one component of such an approach. As this is a standard of development it may be suitable to cover other sustainable transport modes including access to London's public transport network.

Development standard 5: Powerlines

Aim:

The approach here is to address the issue of powerlines as there is current investigation into the potential to remove these to improve the character of the area.

13 High quality urban design

This standard specifically relates to the possibility of improving the character of the area through investigating the possibility of removing overhead powerlines. This may also impact on the use of the land that is currently under these.

Summary and recommendations

This approach should have general positive effects, although actually depends on the feasibility of removing these lines, and if funds could be better spent elsewhere.

Process matters

Delivering development

This process matter was, originally a development process than the way that development will be implemented. .

Deliverability and viability: In order to realise any of the expected sustainability benefits of the masterplan and SPD approach it is vital that the proposed schemes are viable and the sources of funding have been identified.

Section 106 Obligations: Securing suitable contributions from new development can bring a wide variety of sustainability benefits for the area. These contributions help to secure some of the land value from redevelopment areas and put this towards schemes that will benefit the local communities, it may have been suitable to include contributions towards biodiversity and preserving any local built and historic heritage. Therefore effectively and successfully implementing this approach is essential for sustainable development.

When choosing the most appropriate approach it will be important to taken an approach that will ensure the approach is equitable and can be implemented fairly across all suitable new development.

Phasing: The diagram here shows how the various proposed development will be phased, although there are no timeframes given. Although the purpose of this is to retain flexibility it may be misleading, particularly as there may be greater overlap in the implementation of these schemes. In the place of phasing it may be more useful in terms of improving clarity and aiding proper implementation to set out the priorities for schemes, such as those necessary as part of housing decanting, and those schemes that will be implemented later as they are constrained by other matters such as Cross-Rail delivery.

Review and monitoring: Checking for successful implementation is essential in ensuring the SPD is helping the effective implementation of the masterplan framework approach. This allows for review and redrafting as necessary.

Engaging our communities

Aim:

This section sets out approach that should allow the community to have an opportunity to make effective input into development proposals.

5 Social and community needs

By allowing the community a chance to engage on development proposal it should help meet this objective of sustainable development, it should be ensured that all have the opportunity to engage and every effort is made to get a representative view from all parts of the community.

Summary and recommendations

Engaging the community is essential in ensuring new development is welcomed to as great an extent as possible by the community as a whole.

Appendix 3

Sustainability appraisal of proposals

Area 1: Rathbone Market and Barking Road

The regeneration proposals for this area are to create a new district centre this could have a variety of sustainability benefits. The mix of uses in one location should help to provide accessible services that are a walkable distance from the majority of people's homes in the regeneration area. This will have dual benefits of helping equitable access and in helping to reduce car use.

High density development is proposed here that will make good use of land in this accessible location. Supporting residential development in this area may also help to support these services. A new high quality district centre may also help raise the image of the area, encouraging investment in this part of Newham and bringing high quality urban design.

However residential development in this area will be exposed to poor quality area in and noise pollution from the nearby A13. This could result in adverse impacts on residents' health and well-being. Development will therefore have to be implemented to avoid and mitigate against these impacts.

Given the relative lack of any historic heritage in the whole SPD area it may be particularly important to retain this wherever it is found. The approach to development of this site includes the need to respect the historic environment and built heritage in this area.

It may be suitable to include a requirement that development here includes areas of public open space and landscape planting. This will help to create a more pleasant environment and reduce potential urban heat island impacts associated with a warming climate.

Area 2: Land between A13 and Tant Avenue

This area will be mainly new housing and open space. This will help meet objectives relating to housing needs in the area. The provision of open space can have a variety of sustainability benefits including on health and wellbeing, community cohesion and the quality of the urban environment. In addition, depending on the use and proposed planting there can be benefits for biodiversity including the creation of new habitat areas and meeting Biodiversity Action Plan targets. The space will also play a useful role in buffering the A13 reducing noise and air quality impacts.

There may be adverse impacts on the community character and cohesion in the process of decanting and relocating residents that this scheme entails.

Improvements to pedestrian and cycling links through the area may also help to promote alternatives to car use, which can also improve the health of residents and promote more equitable access to services.

Area 3: Keir Hardie School and land to the east

This is the redevelopment of a school site to make best use of the land. This will include a level of housing, helping to meet the diverse needs of existing and future residents. In implementing this approach it is essential to ensure the overall capacity of the school and its outdoor areas remains at levels to meet the needs of the local community.

This proposal allows the opportunity for the reorganisation of the site that should allow for vulnerable uses, such as homes and the primary school, to be moved away from areas of poor air quality and noise pollution along the A13.

Improvements to pedestrian and cycling links through the area may also help to promote alternatives to car use, which can also improve the health of residents and promote more equitable access to services.

Area 4: Land adjacent to Ashburton Grove Woods and Freemasons Road

This is an area of residential redevelopment to be replaced by new housing and a greater amount of open space. The benefits of the approach are that it should improve the quality of the urban environment, creating more modern housing to meet the needs of residents. In addition this would allow new pedestrian routes to be opened up through the area making access to services on Freemasons Road more direct and promoting walking.

The site proposals do not seek to protect the existing employment uses on site, with a potential to impact on achieving a sustainable local economy and retaining accessible local employment and businesses.

There may be adverse impacts on the community character and cohesion in the process of decanting and relocating residents that this scheme entails.

Area 5 & 18: Land to north of Coolfin Avenue and Boreham Avenue

This is two parcels of land that are to be redeveloped on either side of the proposed new Activity Street. To the north existing housing will be replaced with new housing at higher densities to take into account the housing land lost to the new park.

The new park can have a variety of benefits, including as a recreational resource, play space, a community meeting space, an area to reduce flood impacts, and depending on landscape and planting choices an area that can bring biodiversity enhancements to the area and help achieve Biodiversity Action Plan targets. Care will need to be taken that the park is a safe space for all residents and risks of crime are minimised.

There may also be some new commercial or community uses on ground floor of the Activity Street that passes through the area, which may help expand the retail and service centre of Custom House. All design is proposed as being of high quality appropriate to its park setting.

The new street running through this area may increase traffic flow in this location that is predominantly residential. Therefore attention needs to be paid to managing this, with pedestrian priority if necessary, to protect health and safety and ideally to encourage people away from using their cars.

The decanting of residents and their relocation to new homes may adversely impact on the character of the area, and the health and well-being of some residents.

Area 6 and 19: Custom House and east of Freemasons Road

Proposals for this site are as a mixed use neighbourhood centre, this will include shops, offices, workshop space and restaurants and bars. It is hoped that this area can be enhanced to capitalise on its location near the Excel centre aided by new crossings to the DLR station. This should help meet sustainability objectives relating to accessible services for all and helping to reduce car use by ensuring pedestrian links are safe and direct.

Development here will include buildings up to six storeys and a boulevard and a new public square. All of which should help to create an improved environment and may

encourage the continued enhancement of the area, the services available and the encourage new businesses to locate here thereby aiding economic growth of the area and job availability. Lower storey buildings would also make up part of the area and include family homes

New open space, particularly a tree lined boulevard as proposed, should help provide a high quality open space with natural shading that could help reduce urban climate change impacts.

Area 7: Land between Silvertown Way and Rathbone Street

This is currently a large residential area where the process of removing residents has begun, plans are to see this area cleared and redeveloped with a large proportion of residential development. The scale of the development means that there is scope for a range of homes to meet a diverse range of needs.

The scheme also includes a new civic heart that could include offices, educational resources, a food store and hotel. This could bring accessible services to this area, reducing the need to travel by car, and helping those who do not drive have equitable access to the services they need.

Development here could be of 10+ storeys near the A13 roundabout. This has the potential for a landmark building in the area, although clearly very high quality design principles will be required here to ensure that this building adds character to the area and represent the regenerated area in a positive light.

Development along the main roads that border this site will need to take account of the issues of poor air pollution and noise impacts to and be protected from the potential adverse health and wellbeing impacts this location.

There may be adverse impacts on the community character and cohesion in the process of decanting and relocating people from this large residential neighbourhood that this scheme entails.

Area 8: Silvertown Way West

This site forms an 'island' of industrial uses cut off from residential uses by the Silvertown Way and the rail line. The southern part of the site is to be retained purely for employment, as is set out in UDP Policy. This is welcomed in terms of achieving sustainable development as it is vital to protect employment in the area. The northern part of the site is designated for mixed uses, and it is hoped that this will include useful services, and jobs, for local residents. In conjunction with other development in the area it is development here will have to be a high quality and design to contribute to the character of this site and its location on a narrow strip of road between the Silvertown Way and rail line.

Improving the connections of this site to the surrounding area can bring benefits in terms of reducing car use and ensuring there is equitable access to the site for all.

Area 9: Limmo Site

This site is currently empty with very little access, with the railway to the east and River Lea to the west. This site is identified in the UDP as a Major Opportunity Zone for a mix of uses including residential land open space. However development proceeding is constrained by the Crossrail project where the site may be required for materials storage and a ventilation shaft.

The site currently has poor access with parts having a very low rating under Transport for London's accessibility scale. It would be beneficial if more information was given as to how it is proposed to link the site better with its surroundings, including residential areas. At present there is no indication of how this site would link to the Development Principle 6 that seeks to ensure new regeneration proposals help open up waterside areas to residents as part of the green infrastructure and as a recreational resource.

Development here will need to be of a high quality as the site is very prominent from the west.

Protecting the wharf uses on site will be important to retain the links of the area to its heritage, and not harm the potential for water based freight transport in order to help reduce reliance on long distance road transport and its associated negative sustainability impacts.

This site has been vacant for a number of years and it is highly likely that it supports a range of plants and wildlife. Redevelopment of this site must need to take this into account and ensure development does not harm the biodiversity and the range and type of species identified, including any locally protected habitats or identified BAP habitats of importance.

Area 10a: Wharfside Road

Area 10b: land between Bidder Street and Stephenson Street

Part of these two sites are identified as Major Opportunity Zones in UPD policy and could be a high quality flagship development for employment, retail, leisure and cultural and community uses. This could have benefits in terms of providing accessible services to the area, although currently pedestrian access is not good particularly to Area 10a, and it is relatively cut off from residential communities. Therefore in order to ensure the area is not only really viably access by car there will need to be substantial improvements to pedestrian links, such as through the redeveloped site 20 to central Canning Town.

Part of the site is protected employment land, with the Mayer Pardy Wharf protected from development. Retaining local employment is essential in ensuring continued economic growth and accessible local jobs.

Redevelopment would include the river walkway to provide a recreational resource for local residents, with potential health benefits.

Development here could be of up to 10 storeys that has the potential for a landmark building in the area, although clearly very high quality design principles will be required here to ensure that this building adds character to the area and represent the regenerated area in a positive light.

Area 11: East of Rathbone Street

Much of this site is currently in use as the River Christian Centre with a church and community centres. Surrounding land uses are all residential. Retention and upgrading of community facilities is planned on the site and this is vital to retain this important resource in the area. Any redevelopment will need to ensure it is replacing facilities with like for like or better, with no loss to the wider community.

New homes on part of the site will help upgrade the housing stock in this location to better meet peoples' needs.

Protection of the existing building may help retain the character of the site and retaining the same quantity of green space should also help in protecting residential amenity with a variety of sustainability benefits.

Area 12: Silverton Way east

This is an employment site on the opposite side of the road to site 8. The site is protected for employment uses which is essential in retaining local accessible employment, and services for residents. It may be suitable to improve the use of the site and to upgrade buildings and industrial units as necessary to improve employment provision.

Area 20: Manor Road Park

This site is severely constrained due to location on the busy road junction, that it borders the rail line and that is traversed by powerlines. If it is found feasible powerlines could be removed the site could be redeveloped as residential uses, meeting the housing needs of local residents, and with improved pedestrian links is well located for Canning Town centre and links to employment and mixed uses at site 10a and 10b.

The site currently contains an under used green space and redevelopment could enhance this for community use with also potential benefits for biodiversity and the urban character of the area. In terms of sustainable development it would be preferable to retain all of the existing open space, using landscaping, re-modelling and long-term management of the site to make it a more attractive place for people to use. Open space can have many sustainability benefits, from reducing the impacts of climate change to promoting well-being and bringing about enhancements and meeting BAP targets.

Enhancement Areas

These areas identified through masterplan framework as areas that are predominantly proposed for enhancement as open spaces and community facilities.

In terms of the sustainability benefits of these areas it will be important to consider the wide variety of sustainability benefits these sites can bring. This includes:

- for formal recreation include team sports; for informal recreation and as play space that will help improve local residents health, and can also aid in building community cohesion.
- location for planned outdoor events and festivals to encourage community cohesion and sense of local identity.
- as a biodiversity resource, with planting and management to encourage a range of plants and animals, including helping to meet specific Biodiversity Action Plan targets.
- to contribution to the urban character, including views and the setting of buildings.
- locations that can incorporate landscaping and open space for flood and storm water managements as part of sustainable drainage schemes.
- as a buffer between people and road to reduce air and noise pollution

- to help reduce the heat island effects of the urban environment by providing natural shading and soft surfaces that do not reflect light, helping reduce high summer temperatures particularly in relevant due to a warming climate.

In addition care will have to be taken not to reduce the overall amount of open space and parks the public have access to. Also these parks need to be managed in the long-term (with appropriate funds in place) to avoid the potential for negative qualities these areas can be associated with such as crime including vandalism, anti-social behaviour and fear of crime.

Appendix 4: Comments received on the consultation draft SA Report

Respondent	Ref	Comment	Response
English Heritage	SA1	PPG15 and PPG16 should be identified as key documents to be taken into account in the preparation of the SPD in the <i>Other Plans, Policies and Programmes</i> section. In addition, English Heritage recommends the European Landscape Convention, which was ratified by the United Kingdom government in 2006, also be included. It is the first international convention for the management and protection of landscapes and the text is available at: http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm . Local plans relating to the historic environment could also be included, for example Conservation Area Appraisals and Management plans that fall within the area.	This is a matter is relevant to the Scoping Report. Although it is noted and the messages arising from these documents will help inform the SA.
English Heritage	SA2	Baseline data also needs to be gathered for the historic environment to form the evidence base for Canning Town and Custom House SPD. We welcome inclusion of data on buildings and monuments at risk, however the full range of heritage assets should also be considered. For example, an understanding of historic buildings, areas and their setting; historic parks and gardens; archaeology; heritage landscapes and the wider historic environment, such as those elements that may not be statutorily protected, yet help define the Boroughs local distinctiveness. The appropriate information sources that should be consulted, in respect of the historic environment, are as follows: <ul style="list-style-type: none"> • Greater London Sites and Monuments Record (archaeology, including Scheduled Ancient Monuments and Archaeology Priority Areas); • The Schedule of Buildings of Architectural and Historic Interest (listed buildings); • The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance); • The borough's list of Locally Listed Buildings (or equivalent); • The Register of Historic Parks and Gardens • The London Buildings at Risk Register www.english-heritage.org.uk/BAR; • The HELM website www.helm.org.uk; and • The Heritage Counts website www.heritagecounts.org.uk 	This is a matter is relevant to the Scoping Report. Although none of the proposed development sites in the SPD contain any registered, listed or designated areas of historic built or archaeological heritage.

English Heritage	SA3	English Heritage would also encourage LB of Newham to undertake historic 'characterisation' of regeneration areas in the Borough as part of the character assessment, and to inform how future change can be managed in the historic environment. Your in-house conservation staff would be able to advise you on this, as well as the Greater London Sites and Monuments Record (http://www.english-heritage.org.uk/server/show/nav.8900).	This is noted and may be a matter for the forthcoming LDF preparation.
English Heritage	SA4	<i>Sustainability Framework</i> English Heritage notes and welcomes that a specific sustainability objective on the historic environment has been included (Objective 18). Regarding the criteria set out in Appendix 1, LB of Newham could consider including a question as to whether it will enhance access to the historic environment and also contribute to better understanding of the historic environment. Although we welcome inclusion of buildings and monuments at risk as indicators, there should be indicators to reflect the full range of heritage asset. For example the number of Conservation Areas and number of Conservation Areas with up-to-date appraisals and management plans are potential indicators. English Heritage would encourage LB of Newham to carry out an assessment of existing buildings and character in the regeneration area as there may be potential to designate a conservation area, for example in the area of Barking Road.	This is a matter for relevant to the Scoping Report. Although there are no conservation areas in the SPD area. The potential to designated a conservation are is noted and may be a matter to be addressed by LB if Newham, although not necessary for the SPD.
English Heritage	SA5	<i>Key Sustainability Issues in Canning Town and Custom House</i> English Heritage would encourage LB of Newham to include management of the historic environment as a key sustainability issue that needs to be taken into consideration when preparing the Canning Town and Custom House SPD. The historic environment is a key component of the existing urban environment and enhancement of this resource should be identified as a means to improve quality and local distinctiveness of the area. For example there are a number of important surviving nineteenth and early twentieth century buildings and policies put forward in the SPD should aim to retain and restore these assets in an area that has already been subject to substantial change.	This is noted and will be matter to be addressed through SPD preparation.
English Heritage	SA6	<i>SA of Development Principles and Standards (Appendix 2)</i>	This is noted and changes to the SPD and the

		Overall English Heritage is disappointed with the sustainability appraisal of the principles and standards in this document. The historic environment has been poorly considered (in fact it was not identified once) in terms of sustainability implications. This highlights the need to strengthen the evidence base for this SPD and its SA, which includes analysis of the historic resource in the area, assessment of its significance, identification of threats and also the opportunities presented through regeneration.	SA have raised the importance of historic and local heritage in the area.
English Heritage	SA7	In the 'Process Matters' section it is worth noting that planning obligations (through section 106 agreements) in relation to the historic environment are also a valuable and widely used tool to ensure development proposals are acceptable in planning policy terms.	A reference has been made to the potential to include the built and historic environment in the matters for which planning contributions may be sought.
English Heritage	SA8	<i>SA of Proposals (Appendix 3)</i> An understanding of the historic environment and the sustainability issues associated with the proposals has not been demonstrated adequately by LB of Newham in the SA. For example the appraisal of Area 1 (Rathbone Market and Barking Road) was disappointing considering the number of historic assets of both national and local significance, which has not been considered. Again this highlights the need for baseline data on the historic environment in these areas and a through assessment of the issues and opportunities for regeneration. In the identified 'enhancement areas' English Heritage would urge LB of Newham to consider the sustainability benefits that could be gained through enhancement of the historic environment. This includes historic buildings, areas and their setting; historic parks and gardens; archaeology; heritage landscapes and the wider historic environment that helps define the Boroughs local distinctiveness.	The inclusion of the historic environment is a matter that will need to be addressed through the SPD. Additional comments have been included in the SA of this area proposal to highlight the importance of protecting the built environment.
English Heritage	SA9	<i>Summary of SA of development principles/ standards and proposals</i> The wider benefits of the historic environment should be emphasised in these sections, which if enhanced, could bring improvements to the regeneration of Canning Town and Custom House. English Heritage has published guidance on heritage led regeneration called <i>Regeneration and the Historic Environment</i> . English Heritage would encourage LB of Newham to consider how the historic environment contributes to the vibrancy and vitality of the area and the Borough as a whole. It has a vital role to play in providing sense of place and identity, and enhancement of this resource is a key component of maintaining local	Additional wording has been incorporated to raise the importance of local distinctiveness and character in the built environment, and how this can help in community cohesion.

		<p>character/ distinctiveness in the Borough, particularly in those areas undergoing substantial change. In the proposals put forward for specific areas it is vital these are based on a clear understanding of the historic environment and that policies are developed from a sound evidence base, which has not been demonstrated in the draft SA.</p>	
		<p><i>Identification of impacts and opportunities for mitigation</i> A number of the benefits identified in section 8, may not benefit the historic environment (in fact there could be a negative impact), and it is currently not evident in the draft SA that this has been analysed. Under the EC Directive concerning SEA (2001/42) it is a statutory requirement that impacts on cultural heritage are thoroughly assessed.</p>	<p>An additional section on the built heritage seeks to ensure that historic and built heritage is identified and respected where ever it is found. This includes the need to consider whether additional areas of importance to local heritage or future heritage should be identified and appropriately respected.</p>