2.1 Spatial Strategy: Is the spatial strategy supported by the SA and the HRA?

The spatial strategy of the Local Plan builds on that established by the Core Strategy (2012), which was further developed through the Detailed Sites and Policies DPD (2016), particularly the premise of ensuring a mixed use borough at the forefront of London's growth as a World City. The spatial vision set out in the Local Plan seeks the delivery of sustainable development that fosters a resilient, vibrant, dynamic, cohesive and ambitious borough on a path of convergence with the rest of London, and that optimises the opportunities for transformation and regeneration, building on:

- the area’s natural and historic heritage;
- locational advantages, including extensive infrastructure investment (past, present and planned), excellent and improving transport connections;
- strong employment hubs (Stratford Metropolitan Centre, the ExCel international exhibition centre, London City Airport, University of East London, Prologis Industrial Estate etc.);
- a wealth of development land (particularly within the ‘Arc of Opportunity’) and wider sub-regional growth; and
- a young, diverse population.

The adopted spatial strategy has benefited from continued support from the development industry, residents, members and partner organisations, as evident from implementation monitoring and engagement feedback (see OA pg.4-9, SD06). The review takes forward the options scoped through the Issues and Options Paper (I&O, EB28a EB28b) including:

- the need to maintain transformative regeneration momentum, and take advantage of new opportunities such as Beckton Riverside;
- the need to ensure that the push for higher density development is sustained by complementary jobs and infrastructure growth, through application of the ‘good growth’ principle;
- the need to clarify intentions on certain points by ensuring that the spatial portrait, vision and spatial objectives are embedded in policy (e.g. principles of ‘convergence’, ‘resilience’, ‘mixed and balanced communities’ and ‘homes not at the expense of jobs’ relocated to policy; development opportunities in ‘Urban Newham’ further clarified as an essential ‘web of opportunity’), and by ensuring consistency with thematic policies (e.g. spatial strategy supports principles of ‘Managed Transition’ and ‘Agent of Change’).

Throughout the course of the draft Local Plan’s development, the document was tested at various stages against an extensive and robust Integrated Impact Assessment (IIA) (SD04) in accordance with legal requirements (see Council’s statement on Matter 1.1). This supporting IIA incorporates the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA), alongside an Equalities Impact
Assessment and a Health Impact Assessment and has continued to show that the spatial strategy’s principle of mixed use delivery that meets need, complemented by qualitative principles such as ‘convergence’, ‘mixed and balanced communities’, ‘good growth’ and ‘Agent of Change’, performs well in balancing different sustainability objectives and mitigating impacts in the round (rather than an in-silo focus on a single matter at a time).

The IIA process identified 13 objectives against which draft policies and site allocations have been assessed, prior to submission. The Submission IIA’s (SD04) assessment of the Spatial Strategy & Strategic Framework (i.e. policies S1-6) is set out under Appendix 3, pages 76-79. It demonstrates that no unacceptable impacts have been identified, and where some potential issues or key dependencies have been identified, mitigation and enabling measures have been built into the Plan to ensure, through application of all relevant policies, delivery of sustainable development.

The HRA has also considered the Plan’s spatial strategy and where relevant, issues have been flagged in Strategic Site allocations. Given the way the HRA assesses potential in-combination effects of the closest European site (the Epping Forest SAC), there has been no need for Spatial Policies to reflect specific mitigation requirements. The Council notes that the majority of growth within the borough will occur in the Arc of Opportunity which, in the main, falls outside relevant zones of influence.
2.2 Reasonable alternatives: Have reasonable alternatives been considered in the SA? Is there a clear audit trail from the consideration of option to the preferred strategy in the Plan?

The SA built into the IIA (SD04) has undertaken a thorough assessment of all reasonable alternatives within the scope of a plan review (i.e. where broad policy parameters are built upon), as set out in the Issues and Options Papers (I&O, EB28a EB28b).

The submission version of the IIA outlines under ‘Stages B to D: Developing & Refining Options / Consulting on the draft IIA’ the document’s evolution (pg.24-30). Given the limited scope of the IIA, an Options Appraisal (OA, SD06) was also prepared at Pre-Submission Reg.19 consultation stage and refined for submission to the Secretary of State. This provides the audit trail, by outlining the background and reasoning behind the preferred strategy in the Plan, taking into consideration all relevant matters (evidence base, IIA results, engagement, and consistency).

Importantly, whilst monitoring work shows that the adopted policies are working well, the OA (following on from I&O) sets out the reasons why a ‘do nothing’ approach – the key alternative to each spatial and thematic policy, including the allocation of sites and the designation land - was not the preferred option. Instead, the document demonstrates the where and why opportunities have been taken to strengthen, amend or extend policy. Using a select number of examples of a few key sites and theme areas, the table below sets out how and where reasonable alternatives have been (thoroughly) considered, to allow the preferred option to be appropriately defined. This table is not an exhaustive list and all documents should be read in the round to understand this process for each policy and site allocation.

<table>
<thead>
<tr>
<th>Key matter</th>
<th>Options set out in I&amp;O Paper</th>
<th>I&amp;O IIA assessment of options</th>
<th>Additional options considered following Reg.18 consultation responses?</th>
<th>OA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tall Buildings Strategy</td>
<td>I&amp;O Part 1, pg.20-28 (Option 2)</td>
<td>Pg. 70-72</td>
<td>Yes</td>
<td>Pg. 11-14</td>
</tr>
<tr>
<td>Housing delivery, including issues of mix</td>
<td>I&amp;O Part 1, pg.38-47</td>
<td>Pg. 76-79</td>
<td>No</td>
<td>Pg. 31-47</td>
</tr>
<tr>
<td>New strategic allocation: S01-Beckton Riverside</td>
<td>I&amp;O Part 2, pg.12</td>
<td>Appendix, Pg. 9-16</td>
<td>No</td>
<td>Pg. 95-99</td>
</tr>
<tr>
<td>Revised strategic allocation: S11-Parcelforce</td>
<td>I&amp;O Part 2, pg.20</td>
<td>Appendix, Pg. 68-74</td>
<td>No</td>
<td>Pg. 106-107</td>
</tr>
<tr>
<td>Revised strategic allocation: S18-Limmo</td>
<td>I&amp;O Part 2, pg18</td>
<td>n/a</td>
<td>Yes</td>
<td>Pg. 109-110</td>
</tr>
</tbody>
</table>

Overall, the Council is satisfied that it has demonstrated adequately – through the IIA and OA’s development - that all reasonable alternatives have been considered during the production of the Local Plan, as part of a process of review. The preferred strategy has been arrived at in a transparent manner and is adequately supported by the accompanying documents.
2.3 Mitigation: Which adverse effects identified by the SA and HRA require significant mitigation, and how is the Council addressing these issues, for example in relation to the Epping Forest Special Area of Conservation (SAC)?

As per the Council’s email dated 30th May 2018, the HRA is the subject of further work in light of the April 2018 European court judgement People over Wind & Sweetman v Coillte Teoranta; as such this question will be responded to once the final wording of the HRA is agreed with Natural England (in advance of hearings).