

## **Appendix F**

### **Sustainability Statement Thamesmead and Abbey Wood OAPF**

**December 2020**

# Sustainability Statement

## 1. Introduction

- 1.1 This Sustainability Statement, also known as a post adoption statement for the purposes of the Environmental Assessment of Plans and Programmes (EAPP) Regulations 2004, confirms that the Thamesmead and Abbey Wood Opportunity Area Planning Framework (T&AW OAPF)) has been published on [insert publication date] along with this Sustainability Statement and can be found on the Greater London Authority's web-site [www.london.gov.uk](http://www.london.gov.uk).
- 1.2 In accordance with the requirements of Article 9(1) of the European Directive 2001/42/EC1 (known as the Directive on Strategic Environmental Assessment (SEA), the EAPP Regulations 2004 and Government guidance on sustainability appraisal this statement outlines the sustainability considerations that have been integrated into the T&AW OAPF prior to their publication, the reasons for choosing the preferred policies and measures for monitoring the T&AW OAPF . Appendix 1 sets out the specific environmental aspects considered during the development of the T&AW OAPF, as required by the European Directive on SEA and EAPP Regulations 2004. Appendix 2 sets out the specific considerations in relation to equalities to demonstrate the Mayor and the GLA have met their requirements under the GLA Act 1999, as amended and the Equality Act 2010.
- 1.3 The following information reflects the outcomes of the Integrated Impact Assessment (IIA) including the sustainability appraisal that was undertaken, and comprises the final step of the assessment process as part of the implementation, monitoring and formal publication process of the T&AW OAPF.
- 1.4 The IIA was prepared in-house and was produced in an integrated way to meet the requirements of strategic environmental assessment, health impact assessment, equalities and community safety legislation. The result was an Integrated Impact Assessment Report, which enabled the Mayor both to meet the requirements of the European Directive on Strategic Environmental Assessment, and to meet his duties under the Greater London Authority (GLA) Acts 1999 and 2007, equalities and other legislation to take account of a range of matters including:
- Economic development and wealth creation;
  - Social development;
  - Improvement of the environment;
  - Community safety;
  - Health inequality and promoting Londoners' health; and
  - Equality of opportunity, elimination of discrimination and the promotion of good community relations.
- 1.5 This integrated approach reflects the Greater London Authority's agreed methodology for impact assessment of strategies and policies, and has been used consistently in assessing the draft London Plan.

## **2. Thamesmead and Abbey Wood OAPF**

- 2.1 The T&AW OA is designated in Table A1.1 of the current London Plan (2016) as an Opportunity Area (OA) with an indicative capacity of 3,000 new homes and 4,000 jobs. The T&AW OA designation states that:
- 2.2 *“The residential environment and capacity of Thamesmead should be enhanced through estate renewal integrated with strategic opportunity sites for new housing, social and recreation facilities together with improved open space and Metropolitan Open Land. Access to the riverside and adjacent spaces in Tripcock Park should be enhanced, together with measures to secure better use of landscape assets such as the Ridgeway and improved local connections through the South East London Green Chain. In view of the low-lying nature of parts of the Area, particular attention should be given to flood risk management. There is scope to enhance employment capacity in the White Hart Triangle and other industrial sites, including waste management and logistics provision.”*
- 2.3 The current London Plan sets out public transport schemes and improvements to increase the capacity of public transport in London (Table 6.1). This includes work towards potential extension of the DLR east of Gallions Reach post-2022.
- 2.4 The Intend to Publish London Plan (2019) identifies an opportunity for T&AW OA to accommodate 8,000 new homes up to 2041 (Table 2.1). This is an uplift of 5,000 new homes from the current London Plan. The T&AW OA designation states that alongside the opening of the Elizabeth line at Abbey Wood, major investments in transport infrastructure such as the proposed DLR extension from Gallions Reach are needed to support high density development and provide access to areas of significant employment growth, such as the Royal Docks.
- 2.5 Paragraph 2.1.4 of the Intend to Publish London Plan sets out that OAPFs can represent the first stage in a plan-led approach to providing significant quantities of additional jobs and homes, improvements to transport and other infrastructure, and better access to local services. The Mayor recognises that there are different models for taking these forward depending on the circumstances and development needs of each OA, and for translating these frameworks into policy in Development Plan documents and Supplementary Planning Documents. Whatever model is used, the Intend to Publish London Plan sets out that frameworks must be prepared in a collaborative way with local communities and stakeholders.

### **3. Integrated Impact Assessment**

3.1 The EAPP Regulations 2004 require this Sustainability Statement to set out how the environmental considerations have been integrated into the T&AW OAPF. The IIA not only considered the environmental aspects of the proposals but also the Mayor's other duties as outlined below.

3.2 The Mayor has legal duties to consider the following:

- Economic development and wealth creation (GLA Act 1999, as amended);
- Social development (GLA Act 1999, as amended);
- Protection and improvement of the environment (European Directive 201/42/EC on SEA, The Environmental Assessment of Plans and Programmes Regulations 2004, GLA Act 1999, as amended);
- Health inequality and promoting Londoners' health (GLA Act 1999, as amended);
- Community safety (Crime and Disorder Act 1998, Police and Justice Act 2006); and
- Equality of opportunity, elimination of discrimination and the promotion of good community relations (GLA Act 1999, as amended, Equality Act 2010).

3.3 The GLA adopts an integrated approach to demonstrate how these duties have been considered in the form of an Integrated Impact Assessment. This enables any common themes to be considered together.

#### *Habitats Regulation Assessment*

3.5 Regulation 102 of the Conservation of Habitats and Species Regulations 2010, which implements Article 6(3) of the Habitats Directive (92/43/EEC) requires an appropriate assessment also known as a Habitats Regulation Assessment (HRA) to be undertaken in respect of any plan or project which is likely to have a significant effect on a European site of nature conservation, either individually or in combination with other plans or projects.

3.6 A separate Habitats Regulation Assessment screening report was prepared to support the T&AW OAPF. It concluded the distance between the OA and the sites (9km and 12km respectively), their position north of the river and beyond central London, and the amount of open space within and close to the OA all lead to an assessment that the Thamesmead and Abbey Wood OAPF will not have a likely significant effect on any European Site. In addition, individual schemes within the OA will be subject to wider London Plan and more specific policies set out in the OAPF on air quality, water management, sustainable transport and open space enhancements that aim to minimise adverse effects of development.

## **IIA Scoping report**

- 3.7 The role of the scoping report is to set the framework for the IIA by identifying the sustainability objectives and framework as well as providing background to and identifying trends in the themes and geography of the proposals. The T&AW OAPF IIA Scoping Report was prepared in-house and was developed with a range of input across the GLA, including the GLA Diversity and Social Policy Team, the Housing Team, Transport for London (TfL) and the Demography and Policy Analysis team.

### *Statutory Engagement*

- 3.8 As required by the Regulations, the statutory consultees (Natural England, the Environment Agency, English Heritage, Highways Agency, and Historic England) were invited to comment on the Scoping Report prior to the formal consultation of the IIA, alongside the draft T&AW OAPF. A draft Scoping Report was published between 29 October 2019 – 3 December 2019 for a 5-week consultation period.

- 3.9 The Environment Agency responded, stating that:

*'We generally support the approach proposed for this IIA. There are some areas, which we recommend could be developed further, or some additional points included. We feel that, environmental net-gain and the Thames Estuary 2100 Plan, could be two mechanisms to enable good growth in this opportunity area and offer a response and help adapt to the impacts of a changing climate. These should be strongly represented in the IIA and the forthcoming OAPF, with a focus on implementation.'*

- 3.10 The Environment Agency also recommended that the Scoping Report and forthcoming OAPF include additional programmes and strategies as detailed in their response table (incl. Riverside Strategies and Thames Estuary 2100). This included reference to the principle of 'net gain' in line with the draft London plan and 25 year Environment Strategy. It also suggested a link between environment and health in the key issues of the baseline.

- 3.11 Highways England responded, stating that:

*'Having examined the Thamesmead and Abbeywood OAPF IIA Scoping Report, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32) as this document generally sets out the background data, together guidance and recommendations for the area's enhancement. Accordingly, Highways England does not offer any comments on the consultation at this time.'*

- 3.12 Natural England responded, stating that it *'does not consider that this Scoping report highlights any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.'*

- 3.13 Historic England recommended that the Scoping Report identified:

- Crossness Conservation Area
- Heritage at Risk assets

- the need for an area-wide framework to assess and evaluate the significance of archaeology in the OA

- 3.16 Following the receipt of these comments additional text was included in the IIA Scoping Report to take account of comments received. In particular, reference was added on the principle of 'net gain' and the Thames Estuary 2100 plan. In addition, text was added to the Historic Environment section noting the need for policies that seek to protect and enhance local historic assets, and for an archaeological framework assess and evaluate the significance of archaeology in the OA.

### **The Integrated Impact Assessment**

#### *The Integrated Impact Assessment findings*

- 3.17 A full IIA report was prepared and used the assessment to also prepare an Equalities Impact Assessment, Health and Well-being Impact Assessment and Community Safety Impact Assessment. The Sustainability Appraisal assessed the preferred proposed OAPF components against the sustainability objectives. These objectives included environmental considerations such as biodiversity, air quality and climate change as well as equalities considerations plus health and well-being and accessibility and mobility. Following are the key findings from the IIA Report on the main proposals.

#### *Make the best and most efficient use of land so as to support sustainable patterns and forms of development*

The proposal in the OAPF are likely to be beneficial on several effects. The Places section is clear about the potential opportunities for integrating new development with existing and potential transport infrastructure. This includes intensifying land use around transport nodes and realising opportunities for wider environmental improvements. The importance of new development integrating with existing communities is also emphasised, ensuring that higher density development does not adversely impact on different groups of people. Emphasis is also placed on new development acknowledging the importance of local cultural and historic assets, as well as incorporating resilience principles. In addition, the industrial strategy seeks to intensify uses, making better use of land including providing residential development. The provision of residential development could limit the attractiveness of industrial floorspace provided in mixed-use schemes, although policies in the London Plan are designed to mitigate this risk.

#### *Maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of employment land and safeguard protected industrial capacity*

Several components of the OAPF are likely to have positive effects on this objective. The Places section proposes visions for the future of five places in the OA area. Some of these emphasise the importance of retaining existing industrial floorspace in accordance with draft London Plan policy. Potential new local connections and environmental improvements would also make it easier for existing and future residents to access local job opportunities.

The proposed bus transit and DLR extension would better connect local employment centres to neighbourhood centres creating new opportunities for businesses. This could also contribute to the creation of mixed-use developments in the OA providing employment opportunities to local residents including those in the most deprived areas. Traffic congestion has an adverse effect on the local economy and businesses and the transport proposals of chapter 3 promote a shift from car use to the most space-efficient modes of transport. This would contribute to reducing traffic congestion and help to provide a reliable and resilient network making bus journeys and freight trips quicker and more efficient.

In addition, the spatial strategy facilitates employment by promoting the intensification of SIL to provide more floorspace and local jobs. The strategy promotes new town centre uses, which would provide more job opportunities in the local area.

*Ensure the provision of environmental, social and physical infrastructure is managed and delivered to meet population and demographic change in line with sustainable development and to support economic competitiveness*

The Social and Community Infrastructure section presents an assessment of uses that support each growth scenario. It sets out requirements for specific infrastructure – including schools, leisure and energy. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities. This is likely to ensure that the relevant social infrastructure is accounted for and therefore, is likely to have a positive effect on the sustainability objective.

The public transport proposals in Thamesmead would deliver physical infrastructure which increases connectivity in the area. They would create an integrated public transport network giving greater access to key services and enabling growth in areas which are currently isolated.

The Places section further emphasises the importance of integrating the Healthy Streets approach into future change. This includes promoting cycling, walking and public transport, and implementing projects that improve environmental quality. The Healthy Streets approach aims to contribute to improved physical and mental health and reduce health inequalities. Potential local and strategic connections and improvements are identified, resolving historic severances caused by infrastructure and poor urban design.

Ensure the education and skills provision meets the needs of the area's existing and future labour market and improves life chances for all

The Social and Community Infrastructure section includes an estimated requirement for new facilities linked to the two growth options, and identifies broad locations, and expansion of existing schools. It also references the need for early years provision to be provided as part of mixed-use development. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities

The transport proposals do not directly contribute to education provision but would provide better connectivity and accessibility to local amenities in the OA and beyond the OA. This includes, schools, adult education centre and education services in general, which would benefit young people.

Safeguard and enhance the area's cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen and build strong and inclusive communities in Thamesmead

The Spatial strategy identifies the potential for Thamesmead town centre to provide cultural and social uses that serve the local community which would have potential benefits for faith groups, older people, women with young children and children who all tend to have meetings, coffee mornings and play groups in these centres, encouraging social interaction

Ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities

The Spatial Strategy includes a section on managing flood risk. The entire OA is in Flood Zone 2-3 and sits within the Thames Estuary 2100 action zone. The flood risk sections advises that land may have to be set aside for future flood defenses. This may reduce the amount of land available for development. An Integrated Water Management Strategy has been prepared with recommendations for addressing constraints in the area. The section on Green Infrastructure identifies the contribution that the area's green spaces and water bodies can make to mitigating climate change. It also encourages greening the public realm to create shade and natural cooling.

Help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050

The inclusion of the objective and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. The spatial



strategy encourages a greater range of uses in local centres which would reduce the need to travel

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in CO2 emissions.

*Manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system*

The Spatial Strategy recognises the need for utilities to be provided in a timely manner, and states that discussions have taken place with utility providers to estimate requirements for the OA. It proposes delivery coordination to minimise disruption and mitigate impacts of future growth. The strategy references work being done on energy masterplanning with Bexley to create a heat network, using the Riverside Resource Recovery facility. This could also tackle fuel poverty which affects people in older, poorer housing stock. 10 per cent of households in London are fuel poor and national evidence demonstrates that there is greater proportion of BAME households in fuel poverty and a significant proportion of households that are fuel poor include children. Whilst short term energy supply has been secured, the Development Infrastructure Funding Study identified a shortfall in capacity in the long term, and the upgrades required to meet capacity. The energy section encourages new developments to adopt energy efficient designs and be net zero carbon. The Spatial Strategy and Vision and Principles section is likely to have a positive effect on this objective, while the Places is likely to have a neutral effect.

*Manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community*

The Places and Spatial Strategy has a positive effect on managing the risk of flooding. The Spatial Strategy section on flood risk identifies that the area is in zone 2-3, and that the Thames Estuary 2100 Plan sets out an action plan for tidal flood risk management. This is further emphasised in the Places section. The strategy promotes the production of a Riverside Strategy that could set out requirements for updating flood defences and promotes use of SUDS.

*To protect, connect and enhance the area's natural capital (including important habitats species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network*

The section on Veridion Park SIL identifies environmental considerations and adjacencies with the allocated SINC. Development would need to be carefully managed to protect the SINC. Southmere lake is identified as an opportunity to provide water play areas for childfree. The section on Green Infrastructure notes that Thamesmead has extensive areas of green space and water bodies. It seeks to protect and enhance these existing assets

and sets out a set of principles for development. The map identifies areas of existing assets, improvements to green routes, SINCs and Open Space, as well as potential for urban greening which would have a positive effect on this objective. The strategy seeks to strengthen and enhance SINCs and the natural habitat. This could have a positive effect as development and the loss of vacant land has the potential to displace existing biodiversity.

*Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure*

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in harmful air pollution which impacts human health and the environment. As highlighted in the IIA of the draft MTS and the London Plan, because the most vulnerable tend to be the most exposed, reduced air pollution would also reduce health inequalities in general. By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.

*Tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050*

The proposals in the OAPF are likely to have positive effects with the exception of the Places section which is likely to have a neutral effect. The inclusion of the OAPF objectives on climate change and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. By promoting the Healthy Streets approach, the Places section could contribute indirectly towards the sustainability objective by encouraging a modal shift towards sustainable transport and a corresponding improvement in local air quality.

#### **4. Influence of the IIA and consultation responses**

- 4.1 One of the purposes of IIA is to promote sustainable development through the better integration of economic, social and environmental considerations into the preparation, adoption and monitoring of plans. The work on the T&AW OAPF and its associated IIA has ensured that all relevant sustainability and equality considerations have been addressed in the development of policies, including through a Sustainability Appraisal that considered alternative proposal options.

- 4.2 Statutory consultation has ensured that this work has been carried out robustly. Following the formal public consultation, small alterations to the draft T&AW OAPF were recommended by GLA officers in response to comments received.

#### **Consultation responses to the T&AW OAPF**

- 4.3 There are statutory requirements to consult on the proposals as well as the IIA that informed the proposals. The draft T&AW OAPF was open for consultation for 12 weeks from December 2019. The EAPP Regulations 2004 require this Sustainability Statement to set out how any opinions received have been taken into account.

#### *Consultation responses*

- 4.8 Following is a short summary of the wider responses relevant to the IIA considerations received during the consultation of the T&AW OAPF. All the comments received during the T&AW OAPF consultation are published on the GLA web-site.
- 4.9 Approximately 28 responses from a range of boroughs, developers, amenity groups, public bodies and other stakeholders were received on the draft T&AW OAPF. In addition, a T&AW OAPF specific consultation website was set up which attracted over 3,100 unique visitors and 417 contributions from local people (over 1,670 unique comments). Most comments were supportive of the Mayor's objectives for the Thamesmead and Abbey Wood OA.

The general comments on the draft T&AW OAPF include:

- Transport and Growth – General support for the transport and local connections package proposed. 68% of respondents on the consultation website felt 'positive' or 'somewhat positive' about the proposed transport options. 18% felt neutral and the remaining 14% felt 'somewhat negative' or 'negative'. Safety at night, and better walking and cycling were highlighted as key concerns. Multiple stakeholders, including developer and landowner groups, were supportive of the higher growth scenario (DLR and bus transit). The commercial case for development coming forward as part of the intermediate bus transit scenario was queried. Responses also requested that the OAPF make clearer that new development will need to be of a higher density than the existing context.  
*GLA comment: The intermediate and high growth scenarios were relabelled to provide a clearer narrative that the OAPF plans for the DLR extension, and that in the interim a bus transit could provide improved public transport particularly in North and West Thamesmead and for those that are far from train stations. The delivery of bus transit could have the potential to kick-start some investment and development in the OA. Additional precedents and design guidance were added in the OAPF to demonstrate the level of development envisaged in the OA and to guide future development.*

- DLR route alignment – Responses received asked for clarity on the DLR extension route alignment and the process through which this will be determined. *GLA comment: The OAPF was amended to show the latest DLR route alignment from Gallions Reach station via Beckton Riverside to Thamesmead. Additional reference on next stages for the proposed transport schemes was added to the delivery chapter.*
- OA boundary and ‘potential areas of change’ boundary – Several respondents queried the boundary of the OA and recommended an extension towards Belvedere in the east, and south of Abbey Wood station. The MOL west of Thamesmead Waterfront and the safeguarded river crossing site were requested to be included in the ‘potential areas of change’. *GLA comment: No changes to boundaries in the OAPF were made.*
- Open and green space – The need for better maintenance, accessibility, and amenities in open space was recognised by local communities and stakeholders. Responses were received that recommended the OAPF align more closely with Peabody’s Green and Blue Infrastructure study. *GLA comment: Additional references were provided in response.*
- Social and community uses – Multiple responses raised concerns that there would not be sufficient community provision to support the level of new homes. In particular, a lack of community provision for young people and the elderly, and in the evening, weekends and outdoors were raised. *GLA comment: A strategic assessment of social functions needed to support growth and how these can be physically provided in the OA has been undertaken with RB Greenwich and LB Bexley, and will need to be kept under review with detailed assessments by the LPA.*
- Town Centre and Employment – Concerns were raised on the general lack of information on town centre improvements. The poor mix of shops and lack of access to amenities, leisure activities and services were also raised as concerns for the area. *GLA comment: Additional commentary on town centre and employment improvements were provided in response.*
- Culture and Heritage - Positive comments on the Lakeside Centre improvements were received. The need for more affordable and volunteering activities was raised by local communities. *GLA comment: Additional references on culture and heritage were provided in response.*

## 5. Monitoring

- 5.1 The European Directive 2001/42/EC on SEA requires monitoring of the significant environmental effects of implementing the Plan. The monitoring of the T&AW OAPF will be an integral aspect of a more comprehensive approach to the monitoring and implementation of the London Plan which will bring together monitoring the delivery of each plan policy through the publication of an Annual Monitoring Report and a regularly updated Implementation Report.

5.2 Being guidance to the London Plan the indicators for T&AW OAPF follow those set out in Chapter 8 of the London Plan. For further information see the most recent London Plan Annual Monitoring Report (AMR) which is available on the GLA website<sup>1</sup>.

5.4 In addition, there are other actions undertaken to monitor the effectiveness of the T&AW OAPF on an annual basis. For example, the London Development Database collects information on planning applications in London and can provide a number of statistics regarding new development. Other agencies such as the Department of Environment, Food and Rural Affairs and the Environment Agency as well as the London boroughs collect data on flooding, noise, air pollution and water quality.

## 5. Conclusion

5.1 The T&AW OAPF seeks to support the sustainable development of London. The proposals in the T&AW OAPF have been assessed by the IIA process to be a sustainable response to some of the pressures facing London, whilst making the best use of available resources. The IIA Report concludes that:

‘The assessment of the draft T&AW OAPF has found the framework to be broadly positive when considered against the IIA sustainability objectives and when compared to the alternative of not preparing an OAPF. The OAPF has been assessed as performing strongly against the objectives for housing supply, quality, choice and affordability, sustainable land use, design, accessibility, connectivity. and economic competitiveness and employment. While there are some neutral effects, such as those in relation to air quality, greenhouse gas emissions and water resources, no negative effects were identified through the assessment.’

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<sup>1</sup> <http://www.london.gov.uk/priorities/planning/research-reports/monitoring-london-plan>

## **Appendix 1 – Environmental considerations in the development of the T&AW OAPF**

The European Directive 2001/42/EC1 on Strategic Environmental Assessment requires plans and programmes that are considered to have significant effects on the environment to be assessed for their environmental impact. The SEA Directive has been transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004.

This Sustainability Statement or post-adoption statement is prepared in accordance with s16 of the Environmental Assessment (IIA) of Plans and Programmes Regulations 2004. This Appendix to the overall sustainability statement specifically addresses the requirements of s16(4) of the Regulations.

### **(a) how environmental considerations have been integrated into the plan or programme;**

Environmental considerations were considered through the development of the Integrated Impact Assessment for the T&AW OAPF, which includes a Strategic Environmental Assessment, as part of the Sustainability Appraisal element of the IIA.

The Sustainability Appraisal assessed the potential impacts of the proposals on the Sustainability Objectives. The Sustainability Objectives specific to the environment included biodiversity, flood risk and climate change adaptation, climate change mitigation and energy, water quality and water resources, waste, air quality. Where the proposals related to the sustainable use of land the objective relating to regeneration and land-use is also relevant.

See the full IIA Scoping Report for full details on the Key Sustainability Objectives and the Sustainability Appraisals.

### **(b) how the environmental report has been taken into account;**

Many of the proposals in the OAPF will have a potential direct or indirect effect on the environment. The IIA appraisal was considered in total in the further development of the policies. For example, further cross references were included between policies to ensure development, especially in areas likely to experience higher densities considered the lifetime neighbourhoods policies to create liveable and diverse communities.

The IIA findings included:

#### *Make the best and most efficient use of land so as to support sustainable patterns and forms of development*

The proposal in the OAPF are likely to be beneficial on several effects. The Places section is clear about the potential opportunities for integrating new development with existing and potential transport infrastructure. This includes intensifying land use around transport nodes and realising opportunities for wider environmental improvements. The importance of new development integrating with existing communities is also emphasised, ensuring that higher density development does not adversely impact on different groups of people. Emphasis is also placed on new development acknowledging the importance of local cultural and historic assets, as well as incorporating resilience principles. In addition, the industrial strategy seeks to intensify uses, making better use of land including

providing residential development. The provision of residential development could limit the attractiveness of industrial floorspace provided in mixed-use schemes, although policies in the London Plan are designed to mitigate this risk.

*Maintain, strengthen and support the local economy, recognising the existing and historical economic base with regard to logistics, manufacturing and the Thames Estuary Production Corridor vision and build upon this as a priority. To enhance the existing economy by improving conditions for business to thrive. To plan for efficient use of employment land and safeguard protected industrial capacity*

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The Social and Community Infrastructure section presents an assessment of uses that support each growth scenario. It sets out requirements for specific infrastructure – including schools, leisure and energy. This would support a greater choice of schools and educational opportunities for all, which is particularly important for low-income communities, ethnic minority groups, disabled residents or those with existing health conditions, and Gypsy and Traveller communities. This is likely to ensure that the relevant social infrastructure is accounted for and therefore, is likely to have a positive effect on the sustainability objective.

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*Ensure that the area adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks through regeneration and development opportunities*

The Spatial Strategy includes a section on managing flood risk. The entire OA is in Flood Zone 2-3 and sits within the Thames Estuary 2100 action zone. The flood risk sections advises that land may have to be set aside for future flood defenses. This may reduce the amount



of land available for development. An Integrated Water Management Strategy has been prepared with recommendations for addressing constraints in the area. The section on Green Infrastructure identifies the contribution that the area's green spaces and water bodies can make to mitigating climate change. It also encourages greening the public realm to create shade and natural cooling.

*Help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050*

The inclusion of the objective and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. The spatial strategy encourages a greater range of uses in local centres which would reduce the need to travel

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in CO2 emissions.

*Manage and reduce demand for energy, achieve greater energy efficiency, utilise new and existing energy sources effectively, and ensure a resilient smart and affordable energy system*

The Spatial Strategy recognises the need for utilities to be provided in a timely manner, and states that discussions have taken place with utility providers to estimate requirements for the OA. It proposes delivery coordination to minimise disruption and mitigate impacts of future growth. The strategy references work being done on energy masterplanning with Bexley to create a heat network, using the Riverside Resource Recovery facility. This could also tackle fuel poverty which affects people in older, poorer housing stock. 10 per cent of households in London are fuel poor and national evidence demonstrates that there is greater proportion of BAME households in fuel poverty and a significant proportion of households that are fuel poor include children. Whilst short term energy supply has been secured, the Development Infrastructure Funding Study identified a shortfall in capacity in the long term, and the upgrades required to meet capacity. The energy section encourages new developments to adopt energy efficient designs and be net zero carbon. The Spatial Strategy and Vision and Principles section is likely to have a positive effect on this objective, while the Places is likely to have a neutral effect.

*Manage the risk of flooding from all sources and improve the resilience of property and infrastructure to flooding and reduce its effects and impacts on the community*

The Places and Spatial Strategy has a positive effect on managing the risk of flooding. The Spatial Strategy section on flood risk identifies that the area is in zone 2-3, and that the Thames Estuary 2100 Plan sets out an action plan for tidal flood risk management. This is

further emphasised in the Places section. The strategy promotes the production of a Riverside Strategy that could set out requirements for updating flood defences and promotes use of SUDS.

*To protect, connect and enhance the area's natural capital (including important habitats species and landscapes) and the services and benefits it provides linking it directly with the wider London green and blue network*

The section on Veridion Park SIL identifies environmental considerations and adjacencies with the allocated SINC. Development would need to be carefully managed to protect the SINC. Southmere lake is identified as an opportunity to provide water play areas for childfree. The section on Green Infrastructure notes that Thamesmead has extensive areas of green space and water bodies. It seeks to protect and enhance these existing assets and sets out a set of principles for development. The map identifies areas of existing assets, improvements to green routes, SINC's and Open Space, as well as potential for urban greening which would have a positive effect on this objective. The strategy seeks to strengthen and enhance SINC's and the natural habitat. This could have a positive effect as development and the loss of vacant land has the potential to displace existing biodiversity.

*Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality, and reduce exposure*

The transport proposals encourage existing and new residents to use sustainable modes which reduce reliance on cars. This could lead to a decrease in the number of cars on the local network, a reduction in traffic congestion and a reduction in harmful air pollution which impacts human health and the environment. As highlighted in the IIA of the draft MTS and the London Plan, because the most vulnerable tend to be the most exposed, reduced air pollution would also reduce health inequalities in general. By promoting the Healthy Streets approach, the Places section could contribute towards a modal shift towards sustainable transport and a corresponding improvement in local air quality.

*Tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050*

The proposals in the OAPF are likely to have positive effects with the exception of the Places section which is likely to have a neutral effect. The inclusion of the OAPF objectives on climate change and aim to coordinate delivery of district heating is more likely to result in the delivery of such a network and reduce carbon dioxide emissions. The mixed used nature of development is more likely to enable the use of waste heat from industrial and waste processes, reducing the need for gas heating. By promoting the Healthy Streets approach, the Places section could contribute indirectly towards the sustainability objective by encouraging a modal shift towards sustainable transport and a corresponding improvement in local air quality.

- (c) **how opinions expressed in response to—**
- (i) **the invitation referred to in regulation 13(2)(d);**
  - (ii) **action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;**

Section 3 and 4 of this statement summarises the relevant consultation responses in relation to the OAPF, the IIA and the Mayor's and the GLA's duties. Section 4 sets out how the consultation responses influenced the OAPF.

With regards to the IIA Scoping Report, the Environment Agency, stated it was generally supportive of the approach proposed for this IIA. However, there were some areas, which could be developed further, or some additional points included (e.g. those in relation to environmental net-gain and the Thames Estuary 2100 Plan).

proposed policy changes to accommodate growth had the potential to impact the environment. In line with its comments additional consideration was included in the IIA Scoping Report on the baseline information, potential mitigation measures and the cumulative effects. In line with its comments additional consideration was included in the IIA Scoping Report on the baseline information and the cumulative effects.

Highways England responded that it was satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32) as this document generally sets out the background data, together guidance and recommendations for the area's enhancement.

Natural England responded did not consider that the Scoping report highlights any likely risk or opportunity in relation to our statutory purpose.

Historic England recommended that the Scoping Report identified the Crossness Conservation Area, Heritage at Risk assets and the need for an area-wide framework to assess and evaluate the significance of archaeology in the OA.

Following the receipt of these comments additional text was included in the IIA Scoping Report to take account of comments received. In particular, reference was added on the principle of 'net gain' and the Thames Estuary 2100 plan. In addition, text was added to the Historic Environment section noting the need for policies that seek to protect and enhance local historic assets, and for an archaeological framework assess and evaluate the significance of archaeology in the OA.

- (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;**

n/a

- (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;**

The Sustainability Appraisal appraised the preferred options and alternative options for the proposed policies. The chosen policies were those that were appraised to have a likely overall positive effect against the sustainability objectives.

- (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.**

The monitoring of the T&AW OAPF will be an integral aspect of a more comprehensive approach to the monitoring and implementation of the London Plan which will bring together monitoring the delivery of each plan policy through the publication of an Annual Monitoring Report and a regularly updated Implementation Report.

Being guidance to the London Plan the indicators for T&AW OAPF follow those set out in Chapter 8 of the London Plan. For further information see the most recent London Plan Annual Monitoring Report (AMR) which is available on the GLA website .

In addition, there are other actions undertaken to monitor the effectiveness of the T&AW OAPF on an annual basis. For example, the London Development Database collects information on planning applications in London and can provide a number of statistics regarding new development. Other agencies such as the Department of Environment, Food and Rural Affairs and the Environment Agency as well as the London boroughs collect data on flooding, noise, air pollution and water quality

## Appendix 2 – Equalities considerations in the development of the T&AW OAPF

The Mayor and GLA have “general public sector duties” under equality and wider legislation. As set out in paragraph 1.2 and 1.3 of this Sustainability Statement, the IIA process included an Equalities Impact Assessment of the T&AW OAPF.

The public sector equality duty under Equality Act 2010 covers age, being or becoming a transsexual person, being married or in a civil partnership, being pregnant or having a child, disability, race including colour, nationality, ethnic or national origin, religion, belief or lack of religion/belief, sex, sexual orientation. These are the grounds upon which discrimination is unlawful and are referred to as ‘protected characteristics.’ The Duty requires the Mayor when exercising his functions to have ‘due regard’ to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An Equalities Impact Assessment was carried out as part of the wider IIA of the T&AW OAPF. *Equalities* was one of the key sustainability objectives that all the proposed alterations and their alternative options were appraised against. *Health and well-being* and *access and mobility* are key sustainability objectives linked to equalities. The appraisal of the proposed policies against these objectives was integrated into the outputs of the full IIA report.

The Assessment of Equalities Effect (Para XX to the IIA of T&AW OAPF) concludes that most of the proposals in the OAPF will overall have a generally positive effect on the GLA’s identified equality objectives. Neutral effects have been identified in relation to two equality objectives that is i) Materials and waste – The OAPF has a neutral effect in keeping materials at their highest value for as long as possible and reducing waste generated; ii) Noise and vibration –The OAPF is regarded as having a neutral effect on minimising noise and vibration levels and disruption to people and communities across the OA.

### Equalities responses to the draft FALP

- The greatest impact on equalities is likely to come from the social and community infrastructure strategy in the OAPF, which sets out a strategic estimation of the social infrastructure required to support a growing population. Transport and walking/cycling proposals in the OAPF would improve connectivity of the area significantly, making it easier and quicker for existing and future residents to travel to existing and proposed social infrastructure, such as in Thamesmead Town Centre, Waterfront and Southmere Lake. By providing sufficient infrastructure, such as sports and community facilities, and access to facilities that provide multiple services, this could promote social inclusion by providing areas for people to meet and interact. It is also noted that the location of these facilities has potential to cause an uneven impact on different groups depending on proximity to services.
- The housing uplift proposed is also likely to impact on equalities. All transport options would support the additional provision of housing. The DLR and bus transit would support the

highest housing growth. This should in turn support the greatest provision of affordable housing and specialist housing – benefiting young families, older people, disabled people, BAME groups. This option has the greatest potential to alleviate homelessness, which could benefit woman who are single parents or victims of domestic abuse and alleviate overcrowding which affects BAME families the most. Transport improvements can increase property values which could have a positive effect on those who already own their own homes but could increase costs for those wanting to buy or rent in the area. This would benefit older people who are most likely to own their own home but disadvantage young adults who are least likely to own their own home, but want to.

- There is the potential for differential impacts to occur on vulnerable groups, in particular:
  - Whilst the accessibility improvements promoted through the transport and movement strategy and linked local connections plan within the OAPF would improve connectivity for all residents within the OA, the planned improvements to public realm and the integration of stations with their surroundings would be of particular benefit to disabled people in terms of improving step free access;
  - An identified Gypsy and Traveller site is located within the OA. The OAPF refers to protecting the existing provision and encourages early engagement and inclusion in development proposals in its proximity with the Gypsy and Traveller community in order to provide opportunities for the community to actively participate and be involved in decision making; and,
  - The focus within the social and community infrastructure section of the OAPF on providing sufficient school places to meet rising demand would be of particular benefit to young people. This could minimise the need for young people resident within the OA to travel beyond the locality to attend school, which could have wider equalities benefits in terms of minimising travel costs.