

Royal Borough of Greenwich Local Plan

Integrated Impact Assessment (Regulation 18 Consultation Draft)

December 2025

Table of Contents

Reference:	Section:	Page number:
1	Introduction	2
1.1	The Draft Local Plan	2
1.2	What is an Integrated Impact Assessment	4
2	IIA Scoping	8
2.1	Baseline information and data	8
2.2	Relevant Plans, Programmes and Strategies	9
2.3	IIA Objectives	9
2.4	Links to the Corporate Plan	10
3	Approach to the IIA	12
3.1	IIA Framework	12
3.2	Methodology and scope	14
3.3	Approach to Habitats Regulations Assessment	15
3.4	Approach to Health Impact Assessment	16
3.5	Approach to Equalities Impact Assessment	16
4	Reasonable Alternatives	18
4.1	Options considered	18
4.2	Appraisal of options	19
4.3	Reasons for choosing the preferred option	20
5	Assessment Results	22
5.1	Spatial Area Policies	22
5.2	Housing Policies	24
5.3	Economy Policies	25
5.4	Town Centre Policies	27
5.5	Design and Heritage Policies	28
5.6	Environment Policies	30
5.7	Climate Emergency Policies	31
5.8	Transport Policies	32
5.9	Key findings from the Habitats Regulation Assessment	34
5.10	Key findings from the Health Impact Assessment	34
5.11	Key findings from the Equalities Impact Assessment	35
6	Monitoring	36
7	Next Steps	38
Appendix 1	Scoping Report	
Appendix 2	Effects of Local Plan Policies	
Appendix 3	Habitats Regulations Assessment Screening	
Appendix 4	Health Impact Assessment	
Appendix 5	Equalities Impact Assessment	

1 Introduction

1.1 The Draft Local Plan

The Royal Borough of Greenwich is preparing a new Local Plan to cover the period 2022 to 2037. Once adopted, it will replace planning policies in the adopted Core Strategy (2014) and the site allocations saved from the Unitary Development Plan (2006). The Local Plan will, together with the London Plan and the 'made' Lee Neighbourhood Plan, form the statutory development plan for the Royal Borough.

The draft Local Plan sets a vision that Royal Greenwich will be a borough of thriving, inclusive, and resilient communities, where high-quality homes, vibrant town centres, sustainable transport, economic investment and green and blue infrastructure are delivered. It aims to shape a future that celebrates our heritage, champions design excellence, and leads the way in climate action.

To deliver this vision, the draft Plan sets out sixteen objectives:

Sustainable growth: We will unlock the full potential of development sites to deliver well-designed, inclusive, and connected places. Through strategic investment and optimising densities, we will enable sustainable growth, strengthen local identity, and create thriving communities supported by infrastructure, jobs, and green spaces.

Deliver adaptable and inclusive homes for all: We will ensure the delivery of high-quality, adaptable homes that meet the diverse needs of residents across all life stages, including older people, and people with disabilities. This includes promoting wheelchair-accessible and supported housing and encouraging innovative building types.

Promote balanced, mixed, and affordable communities: We will promote the development of balanced and inclusive communities by significantly increasing the supply of genuinely affordable homes and ensuring a diverse mix of housing types, tenures, and sizes. This includes prioritising family-sized homes to reduce overcrowding in Royal Greenwich. We will work to ensure that both new and existing residents can access suitable, high-quality homes and remain rooted in their communities.

Align housing growth with infrastructure capacity: We will ensure that new housing development is supported by sufficient infrastructure capacity, including transport, education, health, and green spaces, to maintain high living standards and equitable access to services and amenities.

Enable safe and sustainable travel: We will improve active and sustainable transport choices by enhancing walking and cycling routes, integrating public transport options, and supporting the transition to low-emission travel. This includes prioritising accessibility, healthy streets and connectivity across the borough.

Deliver inclusive and well-connected places: We will create places that are welcoming, accessible and safe for all users, and are enhanced through high-quality

placemaking, improved public realm and connectivity with new development that strengthens the distinct character and identity of Royal Greenwich.

Create attractive, usable places for people to live healthy lives: We will create accessible, attractive and sustainable green and open spaces which residents enjoy using and can use easily within their daily lives. Existing spaces will be protected and enhanced, and green and blue infrastructure will be plentiful and high quality, providing residents and visitors with a choice of different types and sizes of spaces to relax and play in.

Protect our ecosystems: Levels of biodiversity will be maximised across the borough, enriching our habitats, protecting key flora and fauna species and encouraging them to thrive.

Equip for climate resilience: We will promote climate-resilient design in all development and encourage urban greening as a form of transformative adaptation.

Reaching Net Zero: We will ensure development supports the aspiration to reach net zero and significantly reduce carbon emissions. New buildings will be designed and constructed to the highest standards of energy efficiency, incorporating low-carbon technologies and sustainable design principles, and improving Whole Life Carbon and the Circular Economy.

Facilitate Economic Investment and Resilience: We will facilitate inward investment and deliver a resilient and inclusive economy by strengthening and protecting existing employment sites, enabling job growth and providing opportunities for the local supply chain.

Business Growth and Workspace Provision: We will support business growth by delivering high-quality, affordable, and flexible workspace in our town centres and designated employment areas.

Promote vibrant and diverse town centres: We will support the adaptive reuse and revitalisation of our town centres; by encouraging thriving town centres which provide high-quality new homes and a mix of daytime and evening retail, leisure, community, culture and service uses that meet the evolving needs of residents, businesses, and visitors.

Promote high-quality design across all development: We will ensure new development is of exemplary design quality, responding positively to local character, context, and identity, encouraging innovation in architecture while respecting our rich historic environment.

Celebrate, protect and enhance Greenwich's unique heritage assets: We will promote awareness and appreciation of the borough's rich heritage, safeguard the integrity of the Maritime Greenwich World Heritage Site, and protect and enhance our conservation areas, listed buildings, locally significant heritage assets and strategic views of historic landmarks and landscapes.

Promote heritage-led regeneration: We will support the adaptive reuse of historic buildings to support sustainable development and cultural vitality, as well as

encourage the use of heritage as a catalyst for placemaking and economic growth, especially in town centres and waterfront areas.

1.2 What is an Integrated Impact Assessment

An Integrated Impact Assessment (IIA) brings together a number of assessments of the social, environmental and economic impacts of planning under a single framework. It fulfils the statutory requirements for the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of all plans and programmes. It also fulfils the requirements for a Health Impact Assessment and an Equalities Impact Assessment. The Habitats Regulation Assessment (HRA) is undertaken as a parallel process to the IIA, with findings of the HRA screening integrated into the IIA as appropriate. The integrated approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work, particularly as the various types of impact assessment deal with many of the same issues.

Sustainability Appraisal (SA)

Section 19(5)¹ of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More commonly, section 39(2)² of the Act requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development”. The appraisal should include an assessment of the likely significant impacts (economic, social and environmental) of the plan. The SA should incorporate a Strategic Environmental Assessment for the purposes of The Environmental Assessment of Plans and Programmes Regulations 2004.

National Planning Policy Framework 2024 Paragraph 33ⁱⁱⁱ states that

“Local Plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

The Strategic environmental assessment and sustainability appraisal Planning Practice Guidance (PPG) on Strategic environmental assessment and sustainability appraisal at paragraph 006³ encourages that “work (on the sustainability appraisal process) to start at the same time that work starts on developing the plan” Paragraph 013 of the PPG includes a flowchart which shows the relationship between the Local Plan preparation and Sustainability Appraisal, as shown in Figure 1.

¹ Planning and Compulsory Purchase Act 2004 Section 19(5): [Planning and Compulsory Purchase Act 2004](#)

² Planning and Compulsory Purchase Act 2004 Section 38(2): [Planning and Compulsory Purchase Act 2004](#)

³ Strategic environmental assessment and sustainability appraisal Planning Practice Guidance (PPG) paragraph 006: [Strategic environmental assessment and sustainability appraisal - GOV.UK](#)

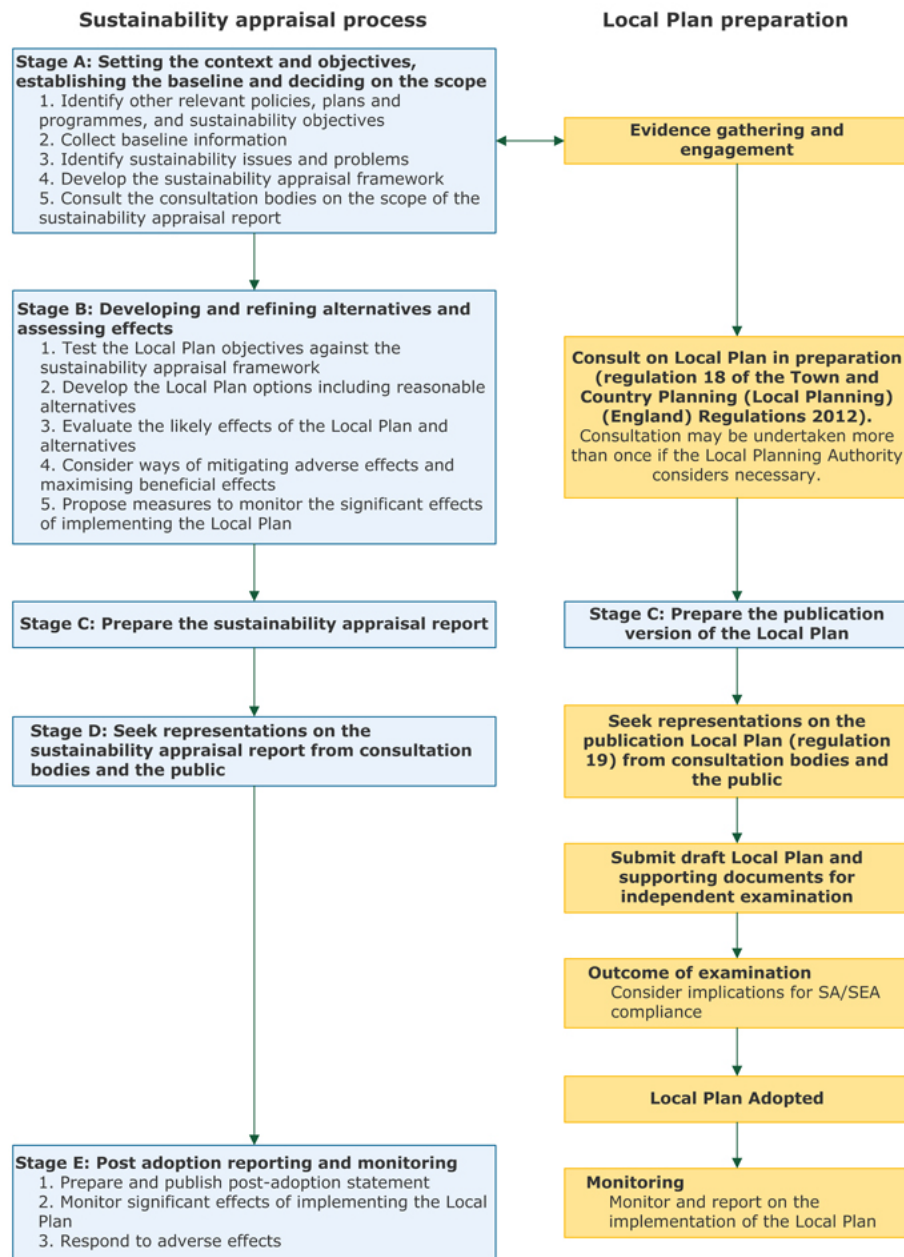


Figure 1: Sustainability Appraisal process

Stage A, (setting the context and objectives, establishing the baseline and deciding on the scope) forms the IIA Scoping Report, summarised in Section 2 of this document and attached in full as Appendix 1. Stage B (developing and refining alternatives and assessing effects) is reported in this IIA document. Both the Scoping Report and the IIA are published alongside the draft Local Plan.

Strategic Environmental Assessment (SEA)

Annex 1 of the SEA Directive states that the assessment should include information on the likely significant effects on the environment, including on issues such as;

- i. biodiversity;
- ii. population;
- iii. human health;
- iv. fauna;

- v. flora;
- vi. soil;
- vii. water;
- viii. air;
- ix. climatic factors;
- x. material assets;
- xi. cultural heritage, including architectural and archaeological heritage;
- xii. landscape;
- xiii. the inter-relationship between the issues referred to in subsections (i) to (xii)

Habitats Regulation Assessment

The IIA will incorporate a Habitats Regulations Assessment (HRA) to meet Regulation 63 of the Conservation of Habitats and Species Regulations 2017. An HRA is a process used to evaluate whether a proposed plan could significantly affect a protected habitats or species of European significance. Its purpose is to ensure that any development does not harm the integrity of these sites or undermine their conservation objectives.

Health Impact Assessment (HIA)

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

The physical environment is shaped by planning decisions which can facilitate or deter a healthy lifestyle, affect the quality and safety of the environment, encourage or discourage employment and training opportunities, enhance or harm social networks and nurture or neglect opportunities for a rich community life. An HIA identifies actions that can enhance positive effects on health, reduce or eliminate negative effects, and reduce health and social inequalities that may arise through planning decisions. It considers how and to what extent proposed policies are likely to affect the health of people.

While there is not statutory requirement to undertake a Health Impact Assessment, the Royal Borough is committed to embedding public health considerations into planning policy and relevant strategies.

Equalities Impact Assessment (EqIA)

The Royal Borough has a statutory duty to consider the equality impacts of its decisions. An Equalities Impact Assessment (EqIA) is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. The Act extended the previous duties to cover the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race - including ethnic or national origins
- Colour or nationality
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

Carrying out an EqlA supports good decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups.

2 Scoping

Scoping: setting the context and objectives, establishing the baseline and deciding on the scope, forms the first stage in the preparation of the Integrated Impact Assessment (IIA). Through the scoping stage, a set of IIA objectives has been developed and an IIA Framework established, which is used to assess the effects and impacts of the draft policies in the Local Plan.

The Scoping Report is attached as Appendix 1 to the IIA, with the key findings summarised below.

2.1 Baseline information and data

Collecting baseline information is an important part of the scoping process for the IIA and sets out the current conditions in Royal Greenwich. This key information is a starting point to help identify the key sustainability issues and problems, establishing the current economic, social and environmental context. It provides the baseline for assessment and future monitoring of the Local Plan policies.

Baseline data was collated under the headings of economic issues, social issues and environmental issues, and initial policy areas were identified to tackle these. Broad conclusions are outlined below.

Royal Greenwich faces persistent economic challenges including a low job density, a high proportion of residents in part-time employment, and a business base dominated by micro-enterprises which are vulnerable to economic fluctuations. Some of the borough's retail centres show elevated vacancy rates, despite some recent increases in footfall. The cultural and tourism sectors, concentrated in a few hubs, are growing. Policy requirements identified are to increase local employment opportunities, support small businesses, promote cultural and tourism assets and revitalise town centres.

Housing pressures are acute, with increasing demand arising from rapid population growth. Social and health inequalities are evident in the Borough with high levels of deprivation in some wards and uneven access to health services. There are demographic changes with more older people. Public transport accessibility varies, limiting access to services and opportunities in some areas. Policy requirements identified are the need to expand the provision of affordable and supported housing, improve access to essential services and address inequalities and support community wellbeing across the borough.

Environmental pressures include poor air quality, noise pollution, and water stress. Flooding and other risks associated with climate change, such as extreme heat, are a concern. Royal Greenwich has significant areas of open space, but this is unevenly distributed spatially across the borough. Policies should promote climate-adaptive design, high energy efficiency standards, active travel, urban greening and biodiversity net gain.

2.2 Relevant Plans, Programmes and Strategies

A review of plans, programmes and strategies was carried out to ensure that any relevant information contained within the documents has been taken on board for the preparation of the draft Local Plan. The documents reviewed, which includes those from an international level down to a local level, are not replicated here but can be seen within the Scoping Report itself.

2.3 IIA Objectives

Examination of the baseline information and the review of plans, programmes and strategies informed the setting of the IIA objectives below:

IIA Objective 1: Encourage sustainable transport and enhance connectivity

Improve public transport links, encourage active travel and improve connectivity to reduce reliance on private vehicles. Encourage the transition to low and zero emission vehicles and support the use of sustainable freight solutions.

IIA Objective 2: Enhance the public realm

Use spaces and streets more effectively, integrating a Healthy Streets approach and prioritise kerbside space according to need. Improve the safety and functionality of streets and public spaces, prioritise sustainable transport modes and active travel and ensure accessibility for all.

IIA Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

Secure a reliable supply of safe, sustainable, and well-maintained housing for all, across a range of housing types and tenures addressing specific local needs.

IIA Objective 4: Build resilient and inclusive communities

Deliver vibrant, safe, and sustainable neighbourhoods with affordable and accessible homes and accessible quality community infrastructure.

IIA Objective 5: Respect the Royal Borough's open spaces

Conserve and enhance the borough's natural habitats, biodiversity and water bodies. Ensure that public spaces meet community needs, promote active lifestyles, and foster social cohesion. Address open space deficiencies and seek opportunities for further greening.

IIA Objective 6: Accelerate sustainable, climate resilient development

Drive the transition to net zero by promoting energy efficiency in existing buildings through retrofit programmes, requiring high standards of sustainable construction, deploying renewable energy and low carbon / district heating networks. Incorporate mitigation and adaption measures to reduce and respond to the impacts of climate change.

IIA Objective 7: Improve environmental resilience and resource efficiency

Enhance the borough's resilience by reducing and managing flood risk, improving air quality, increasing biodiversity, reducing waste and driving a circular economy.

IIA Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

Sustain and enhance Royal Greenwich's built environment and townscape, ensure design is of an exemplary standard and respect local distinctiveness

IIA Objective 9: Revitalise town centres, high streets and cultural assets

Create vibrant, prosperous and well-maintained town centres, high streets and shopping parades. Encourage a vibrant and safe night-time economy, encourage creative, cultural, and heritage offerings to attract visitors and support local businesses.

IIA Objective 10: Support and promote inclusive economic growth and boost employment opportunities

Promote sustainable, resilient and inclusive economic growth and regeneration. Protect and make efficient use of existing industrial spaces and ensure they can adapt to meet the evolving and diverse needs of modern businesses to support the local and regional economy. Encourage infrastructure investment to support economic growth. Support local businesses and empower residents to access quality, secure jobs and training.

IIA Objective 11: Improve the quality of life, safety and health and wellbeing of communities

Improve the lives of residents and reduce health inequalities through access to safe, secure affordable homes as well as employment, healthcare and community facilities. Create an environment that promotes physical and mental well-being and ensure that neighbourhoods are vibrant, safe, and attractive, with opportunities for active living.

2.4 Links to the Corporate Plan

The Royal Greenwich Corporate Plan: 'Our Greenwich Annual Plan 2024-2026' sets out the Council's vision and identifies a series of missions within five priority areas: people, places, economy, communities and organisation. The table below shows how these missions can be linked to the IIA objectives.

'Our Greenwich' Priorities	'Our Greenwich' Missions	IIA Objectives
People	People's health supports them in living their best life.	2, 4, 6, 7, 11
	People will not experience discrimination.	3, 4, 11
	Those in financial need can access the right to support, advice and opportunities to improve their situation.	3, 10, 11
	Children and young people can reach their full potential	3, 4, 5, 11
	Everyone in Greenwich is safer & feels safer	2, 4, 11
Place	People in Greenwich have access to a safe and secure home that meets their needs.	3, 4, 11
	It is easier, safer and greener to move around the borough and the rest of London.	1, 2, 6, 7

	Development delivers positive change to an area for existing and new communities.	4, 9, 10, 11
	Neighbourhoods are vibrant, safe and attractive with community services that meet the needs of local residents.	2, 4, 5, 11
	Greenwich plays an active role in tackling the climate crisis and improving environmental sustainability, in line with our commitment of being carbon neutral by 2030.	6, 7
Economy	Everyone has the opportunity to secure a good job.	10,11
	Town centres, high street and shopping parades are vibrant, prosperous, well-maintained places that meet the needs of local people.	9, 2, 4
	Our economy attracts new high value business whilst strengthening its foundations.	9, 10
	The voluntary, community and socially motivated sectors in Greenwich are strengthened and able to provide more support to the most in need.	4, 11
Communities	Our Council is better at listening to communities and communities feel they are heard.	4, 11
	We develop networks with communities, key partners and businesses to meet need and address challenges together.	4, 10, 11
	We design our services around the needs of our residents.	3, 4, 11
Organisation	Our council is an adaptive organisation, enabling it to navigate the increasing number of challenges it faces while remaining financially stable.	10
	Our Council works in the most efficient and effective ways possible.	10
	Our Council is a great place to work, with a diverse workforce who have the right skills and are motivated and empowered to deliver.	10, 11

3 Approach to the IIA

3.1 IIA Framework

The IIA Assessment Framework provides the methodology to consistently analyse and evaluate the environmental, social and economic impacts, and the health and equalities implications of the policies within the Royal Greenwich Local Plan.

Sub-criteria questions have been developed to help in analysing the issues to be considered for each objective, with those questions particularly relevant for assessing the health and equalities implications identified with a * for the Equalities Impact Assessment (EqIA) and a * for the Health Impact Assessment (HIA).

IIA Objective	Sub criteria for assessment Including EqIA*/HIA* considerations
1: Encourage sustainable transport and enhance connectivity	<ul style="list-style-type: none"> a) Will it improve public transport accessibility for all users? ** b) Will it reduce the reliance on private vehicles and promote using low carbon ways of travel? * c) Will it support infrastructure for low/zero emission vehicles? d) Will it improve sustainable freight efficiency? e) Will it enhance connectivity between homes, jobs, services and green spaces in the Royal Borough? **
2: Enhance the public realm	<ul style="list-style-type: none"> a) Will it improve the design, safety and accessibility of streets and public spaces? ** b) Will it ensure that kerbside is allocated to reflect local needs? c) Will it promote inclusive access for all residents? ** d) Will it enhance the character and identity of places and communities through public realm improvements? e) Will it help people connect, build a stronger community, and create a sense of belonging? ** f) Will it encourage active travel and social interaction? *
3: Boost the supply of high-quality housing of all types and tenures to address a range of needs	<ul style="list-style-type: none"> a) Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability? ** b) Will it increase housing supply for all? c) Will it encourage sustainable housing developments to be of an appropriate density, high quality and well designed? d) Will it support housing that is energy efficient and climate resilient? *

4: Build resilient and inclusive communities	<ul style="list-style-type: none"> a) Will the policy support development of neighbourhoods with access to education, healthcare and community facilities? ** b) Will it promote social inclusion and reduce inequalities across the Royal Borough? ** c) Will it encourage community participation in shaping sustainable development? d) Will it improve safety and resilience to social, economic and environmental challenges?
5: Respect the Royal Borough's open spaces	<ul style="list-style-type: none"> a) Will it protect and enhance parks, green spaces and habitats? b) Will it improve open space accessibility for recreation and wellbeing? * c) Will it protect and enhance biodiversity and ecology? d) Will it promote urban greening through tree planting and landscaping? e) Will it ensure equitable access to green spaces across all communities? **
6: Accelerate sustainable, climate resilient development	<ul style="list-style-type: none"> a) Will the policy promote a high standard of sustainable construction and design? * b) Will it support retrofitting of existing buildings within the borough to improve energy efficiency? c) Will it promote renewable energy and low carbon heating systems? d) Will it support the reduction of carbon emissions in line with net zero targets? * e) Will climate adaptation measures be supported?
7: Improve environmental resilience and resource efficiency	<ul style="list-style-type: none"> a) Will the policy reduce and manage flood risk through sustainable measures? * b) Will it improve water and air quality in the borough? * c) Will it support the enhancement of biodiversity, ecology and habitats? d) Will it contribute to the reduction of waste and support recycling and a circular economy? e) Will it encourage efficient use of land, energy and materials? f) Will it ensure environmental improvements benefit all communities equally? *
8: Sustain and enhance the Royal Borough's culture and built heritage	<ul style="list-style-type: none"> a) Will the policy protect and enhance heritage assets and conservation areas? b) Will it ensure that new development respects the local character of the Royal Borough?

	<ul style="list-style-type: none"> c) Will it promote high quality design that reflects the Royal Borough's identity? * d) Will it promote access to cultural spaces for wellbeing? *
9: Revitalise town centres, high streets and cultural assets	<ul style="list-style-type: none"> a) Will this policy support regeneration of town centres and high streets? b) Will it encourage a diverse mix of commercial uses? c) Will it promote a safe and vibrant night-time economy? ** d) Will it enhance the public realm in commercial and cultural areas? e) Will it support cultural industries? *
10: Support and promote inclusive economic growth and boost employment opportunities	<ul style="list-style-type: none"> a) Will the policy protect and optimise employment land for businesses? b) Will it support and encourage local businesses? c) Will it improve access to training, education and employment for all residents? ** d) Will the appropriate infrastructure be improved to support economic growth?
11: Improve the quality of life, safety and health and wellbeing of communities	<ul style="list-style-type: none"> a) Will it improve mental and physical wellbeing through safe environments? * b) Will it promote safe, inclusive and vibrant neighbourhoods for all residents? * c) Will it reduce health inequalities across the Royal Borough? **

3.2 Methodology and Scope

Each of the policies within the draft Plan have been assessed in the IIA, as well as the overall development strategy. It was not considered necessary to assess each of the site allocations individually, since development will need to be in accordance with the policies in the plan, which have been assessed. Although the spatial strategy relies on the bulk of new development being delivered on allocated sites, the Plan also envisages further windfalls on both large and small sites, and plans for this through its policies. In addition, planning applications for major developments need to be accompanied by a site specific Health Impact Assessment and proposals likely to have significant environmental effects are required to be accompanied by an Environmental Impact Assessment (EIA).

Professional judgement has been used to assess the effect of each policy in the draft Local Plan on meeting the IIA objectives, using the sub-criteria questions within the IIA framework, using the rating system below.

Significance of the effects	Description of the effect
++ Major Positive	Likely to deliver significant and lasting benefits across a large area of the Royal Borough, positively impacting a large number of people and environmental factors. The effects are likely to be direct and a substantial magnitude.
+ Minor Positive	The anticipated beneficial effects are likely to be limited to smaller areas of the Royal Borough, smaller groups of people and environmental factors. These factors may be direct or indirect, temporary or reversible. The effects of are likely to be considered as minor.
0 Neutral	Neutral effects are anticipated where the policy under the assessment is unlikely to result in any meaningful change to the existing or future baseline situation.
- Minor negative	Minor negative effects are expected to be limited to smaller areas of the Royal Borough, limited to small groups of people and environmental factors. These factors may be direct or indirect, temporary or reversible.
-- Major negative	Likely to affect the whole or larger area of the Royal Borough, impacting a large number of people and environmental factors. This also applies to nationally or internationally important assets. The effects are likely to be direct, irreversible, permanent and of a substantial magnitude.
? Uncertain	The significant criterion is applied in cases where there is insufficient information to support a conclusive assessment. It is also used when evaluation options that present both positive and negative effects and where it is unclear where the positive or negatives outweigh each other.

3.3 Approach to Habitats Regulations Assessment

The Habitats Regulations Assessment (HRA) for the Royal Greenwich Local Plan (2022–2037) has been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017, which transpose the requirements of the European Habitats Directive (92/43/EEC) into UK law. The HRA process follows a staged methodology, beginning with a screening assessment to determine whether the Local Plan is likely to have significant effects on any European or Ramsar sites, either alone or in combination with other plans or projects. This initial screening is based on objective information and considers potential impact pathways such as recreational pressure, air quality, water abstraction, and water quality.

Given that there are no European or Ramsar sites within the Royal Borough of Greenwich, the assessment focused on sites located within a 15km buffer zone from the borough boundary, in line with precedent set by the London Plan HRA and government guidance. Sites within 20km were initially listed for completeness, but only those within 15km were assessed in detail. The screening process involved identifying relevant designated sites, reviewing their qualifying features and vulnerabilities, and evaluating whether the Local Plan's proposed growth and policies could result in adverse effects. The assessment drew on existing evidence, including the London Plan HRA, visitor surveys, air quality data, and water resource management strategies, to ensure a robust and precautionary approach.

The Habitats Regulations Screening Assessment is attached in full as Appendix 3, with the key findings summarised in section 5.10.

3.4 Approach to Health Impact Assessment

Within the IIA Framework, many of the sub-criteria questions have a direct or indirect impact on health. The following have been identified as being the most relevant.

Objective	Sub-Criteria
1	Will it improve public transport accessibility for all users?
1	Will it reduce the reliance on private vehicles and promote using low carbon ways of travel?
2	Will it improve the design, safety and accessibility of streets and public spaces?
2	Will it encourage active travel and social interaction?
3	Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability?
3	Will it support housing that is energy efficient and climate resilient?
4	Will the policy support the development of neighbourhoods with access to education, healthcare and community facilities?
4	Will it promote social inclusion and reduce inequalities across the Royal Borough?
5	Will it improve open space accessibility for recreation and wellbeing?
6	Will it support the reduction of carbon emissions in line with net zero targets?
7	Will the policy reduce and manage flood risk through sustainable measures?
7	Will it improve water and air quality in the borough?
8	Will it promote access to cultural spaces for wellbeing?
9	Will it promote a safe and vibrant night time economy?
10	Will it improve access to training, education and employment for all residents?
11	Will it improve mental and physical wellbeing through safe environments?
11	Will it reduce health inequalities across the Royal Borough?

The Health Impact Assessment considers how the draft Local Plan policies address these criteria and links to the priorities set out in the Royal Greenwich's Health and Wellbeing Strategy 2023-2028.

The Health Impact Assessment is attached in full as Appendix 4, with the key findings summarised in section 5.10.

3.5 Approach to Equalities Impact Assessment

The EqIA is built into the IIA Framework. While many of the sub-criteria questions have an indirect impact on equalities, the following have been identified as being the

most relevant.

Objective	Sub-Criteria
1	Will it improve public transport accessibility for all users?
1	Will it enhance connectivity between homes, jobs, services and green spaces in the Royal Borough?
2	Will it improve the design, safety and accessibility of streets and public spaces?
2	Will it promote inclusive access for all residents?
2	Will it help people connect, build a stronger community, and create a sense of belonging?
3	Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability?
4	Will the policy support the development of neighbourhoods with access to education, healthcare and community facilities?
4	Will it promote social inclusion and reduce inequalities across the Royal Borough?
5	Will it ensure equitable access to green spaces across all communities?
6	Will the policy promote high standards of sustainable construction and design?
7	Will it ensure environmental improvements benefit all communities equally?
8	Will it promote high quality design that reflects the Royal Borough's identity?
9	Will it promote a safe and vibrant night-time economy?
9	Will it support cultural industries?
10	Will it improve access to training, education and employment for all residents?
11	Will it promote safe, inclusive and vibrant neighbourhoods for all residents?

In addition, the Council has devised its own EqlA framework which has been used to assess which, if any of the protected groups will be affected by the draft policies in the plan.

The Equalities Impact Assessment is attached in full as Appendix 5, with the key findings summarised in section 5.11.

4 Reasonable Alternatives

Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004, requires that where an environmental assessment is required, it should “identify, describe and evaluate the likely significant effects on the environment of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”

Paragraph 35 of the NPPF sets out that for plans to be found sound, they should provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”.

The Local Plan’s broad strategy for growth is to achieve an ambitious target of 42,360 new homes over the plan period, with a stepped trajectory reflecting the borough’s capacity and infrastructure readiness.

4.1 Options considered

In developing the preferred spatial strategy, three options, related to the role that different parts of the Royal Borough would play in accommodating the same level of growth were considered:

- **Alternative Spatial Strategy 1: Strategic Place-Based Approach**

This strategy proposes a place-based approach, with housing growth strategically distributed across eight distinct spatial areas, each with its own character and development context. Development would be aligned with local character, transport accessibility and strategic priorities. High density development would be focussed in Opportunity Areas, closely tied to infrastructure capacity. Outside of these areas, housing growth would be optimised with design-led intensification and windfall and small sites development.

- **Alternative Spatial Strategy 2: Lower-Density Dispersed Growth**

This strategy proposes an equitable distribution of housing growth across the eight spatial areas to meet the London Plan housing target with lower density development borough-wide. This would be achieved through development of greenfield sites and intensification of underutilised land in suburban areas, reducing pressure for development in Opportunity Areas and town centres.

- **Alternative Spatial Strategy 3: Hyper-Dense Urban Intensification**

This strategy locates new development only in the Royal Borough’s Opportunity Areas and around major transport nodes, meeting the London Plan housing target on fewer sites but with even higher densities and taller buildings. This would be achieved through the delivery of super-density zones, where vertical mixed-use development combines multiple uses in very tall buildings to create vibrant urban hubs.

4.2 Appraisal of options

	Alternative 1: Strategic Place-Based Approach	Alternative 2: Lower-Density Dispersed Growth Approach	3: Hyper-Dense Urban Intensification
1: Sustainable Transport and Connectivity	Supports public transport and active travel across a wide area.	May increase car dependency and reduce viability of public transport.	Supports public transport and active travel but only in limited locations.
2: Public Realm	Enables context-sensitive improvements to streets and public spaces.	May not support cohesive street design.	Can enhance streetscapes if well-designed, but risks overcrowding.
3: Housing	Responsive to local needs; supports diverse and inclusive supply.	Will deliver new homes, but may struggle to meet diverse needs or affordability targets.	High delivery potential, especially for affordable housing, but potentially longer delivery timescales and lack of choice in location.
4: Communities	Promotes resilient, well-served neighbourhoods.	Risk of fragmented neighbourhoods with limited access to infrastructure.	Can create vibrant, inclusive neighbourhoods if social infrastructure keeps pace, but in limited locations.
5: Open Spaces	Protects and enhances green infrastructure based on local priorities.	Risk of encroachment onto and loss of green space.	Protects green spaces outside of intensified areas. Increased pressure on greenspace in hubs.
6: Climate Resilience	Allows sustainable development.	Less efficient land use may hinder net-zero goals.	Efficient land use supports net-zero goals; high potential for sustainable construction.
7: Environment	Supports localised environmental improvements.	Could increase emissions due to sprawl.	Environmental benefits in unaltered areas but air quality and waste management needs to be carefully addressed in hubs.
8: Heritage	Strong alignment with preserving and enhancing local distinctiveness.	May dilute local distinctiveness.	Impact of very tall buildings on heritage assets, including the World Heritage Site. Adverse impact on townscape and views.
9: Town Centres and Culture	Enables tailored revitalisation of high streets and cultural assets.	Growth in smaller centres could increase their vitality but potential to affect the retail hierarchy.	Strong potential for intensified hubs but other areas could affect vitality of other centres.
10: Economic Growth	Encourages inclusive regeneration.	Limited potential for clustering jobs.	Supports clustering of jobs, innovation, and infrastructure investment in hubs, but lack of jobs in other local areas.
11: Health and Wellbeing	Promotes safe, attractive, and healthy environments.	Access to services will be mixed.	Can promote active living, but risks stress and inequality if poorly managed.

A further growth option was identified but was not considered to represent a reasonable alternative. It was not therefore subject to testing through the IIA, but is included below for information:

- **A non-stepped approach, with development spread equally across the plan period.**

A significant amount of Royal Greenwich's housing target will be delivered in the medium to long term. This is because a large proportion of housing delivery will be on large, complex site allocations, many of which require associated infrastructure delivery to facilitate high density housing development.

Some of the largest of the borough's site allocations are on sites anticipated to be subject to strategic level investment to optimise housing delivery aligned with London's housing needs, including sites within Thamesmead which require strategic transport investment to enable the extension of the DLR to Thamesmead.

A non-stepped approach would assume unrealistic delivery timescales for these developments and is therefore not considered to be a reasonable alternative strategy.

4.3 Reasons for choosing the preferred option

The Strategic Place-Based Approach aligns strongly with the IIA objectives. With its context sensitive approach, tailoring growth to each area's capacity and identity, it avoids the pitfalls of both sprawl and over-intensification. This approach promotes inclusive regeneration, protects open spaces, and enables targeted investment in town centres and cultural assets. It will deliver inclusive, high-quality, and sustainable growth across Royal Greenwich.

The Lower Density Dispersed Growth Approach does not align well with the IIA objectives. By distributing development more evenly across the borough, this strategy risks increasing car dependency and reducing access to essential services. There is a significant threat of encroachment onto green spaces, which could undermine environmental quality and climate resilience. The dispersed pattern of growth is less efficient in terms of land use, potentially hindering progress towards net-zero carbon goals. Additionally, this approach may dilute local character and distinctiveness, and limit opportunities for cohesive community development.

The Hyper-Dense Urban Intensification approach shows a mixed performance against the IIA objectives. Concentrating growth within existing urban areas at much higher densities enables highly efficient land use and offers strong potential to deliver large numbers of new homes, while supporting public transport and active travel. This focus can foster vibrant, inclusive communities, provided that social infrastructure keeps pace with population growth. However, there is a risk that housing choice may become limited, with areas outside the main hubs evolving into predominantly residential neighbourhoods with limited local activity. While this approach helps protect green spaces beyond the intensification zones, it can place significant pressure on urban open spaces, increasing the risk of overcrowding and potentially having adverse impacts on health and wellbeing. Excessively tall buildings can

adversely affect important views and harm neighbouring heritage assets.

Based on the assessment against the Integrated Impact Assessment (IIA) objectives, the Strategic Place-Based Approach (1) performs best overall. It outperforms both the Lower-Density Dispersed Growth (2) and Hyper-Dense Urban Intensification (3) approaches, offering a balanced delivery that supports housing, economic growth, and infrastructure, while respecting local character and environmental constraints.

5 Assessment Results

This section presents a summary of the key findings from the assessment of the Policies against the sustainability objectives. The full analysis is contained within Appendix 2.

The results are presented in chapter groupings as the policies in each chapter of the Local Plan are strongly connected and are therefore best considered together. Only the objectives on which an impact has been identified are discussed.

5.1 Spatial Area Policies

This section of the Local Plan sets out detailed policies for each of eight distinct spatial areas in the Royal Borough. The policies set out the strategic approach to growth in each area. Each spatial policy is followed by the relevant site allocations for each character area; as explained in section 3.2, these site allocations are not subject to individual assessment. The areas are:

- P1 Greenwich, Westcombe Park and Blackheath
- P2 Greenwich Peninsula
- P3 Charlton
- P4 Woolwich
- P5 Thamesmead and Abbey Wood
- P6 Plumstead and Shooters Hill
- P7 Eltham, Avery Hill, Coldharbour and New Eltham
- P8 Kidbrooke and Middle Park

It should be noted that developments within, and outside of, the site allocations, will need to conform with all relevant policies in the Local Plan. Developments within the spatial areas will therefore contribute to meeting many of the objectives but the assessments summarised here, and provided in full within Appendix 2, relate purely to the wording of the draft Spatial policies.

No impacts have been identified on Objective 6: 'Accelerate sustainable, climate resilient development'. No negative impacts have been identified across any of the Spatial Area policies.

Objective 1: Encourage sustainable transport and enhance connectivity

There are positive contributions towards meeting this objective from 6 of the 8 spatial area policies, (P1, P2, P3, P4, P5 and P6), due to their supporting higher density development in highly accessible locations, reducing car dependency and seeking enhanced walking and cycling infrastructure. Charlton and Thamesmead and Abbey Wood make a more significant contribution due to supporting new and improved public transport in the form of a riverside bus route in Charlton and an extension of the DLR and a rapid bus transit in Thamesmead and Abbey Wood.

Objective 2: Enhance the public realm

There are positive contributions towards meeting this objective from 6 of the 8 spatial area policies, (P1, P3, P4, P5, P7 and P8), due to their emphasis on high quality design, placemaking, improved streetscapes and public space enhancements.

Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

This is the strongest area of contribution, with all spatial area policies having a positive impact on meeting this objective due to their role in the delivery of new housing, in a range of tenures, in a scale appropriate to their character. The most significant impacts are from Greenwich, Westcombe Park and Blackheath, Greenwich Peninsula, Charlton, Woolwich and Thamesmead and Abbey Wood which are wholly or partly within Opportunity Areas and greater growth is envisaged.

Objective 4: Build resilient and inclusive communities

There are positive contributions towards meeting this objective from 5 of the 8 spatial area policies, (P2, P3, P4, P5 and P7), due to their emphasis on providing well-designed, sustainable and inclusive neighbourhoods. Charlton makes a more significant contribution due to supporting vibrant mixed-use quarters including community infrastructure and a new school; Woolwich makes a more significant contribution due to supporting estate regeneration and an evening and night-time economy that fosters community cohesion.

Objective 5: Respect the Royal Borough's open spaces

There are positive contributions towards meeting this objective from 5 of the 8 spatial area policies, (P1, P2, P3, P5 and P8), due to their emphasis on safeguarding open spaces and the delivery of new and enhanced green and blue infrastructure.

Objective 7: Improve environmental resilience and resource efficiency

Only Greenwich, Westcombe Park and Blackheath contributes positively towards meeting this objective, due to reference to the ecological management of open spaces.

Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

All spatial area policies have a positive impact on meeting this objective due to their emphasis on respecting local character, heritage assets and cultural identity. The most significant impacts are from the Greenwich, Westcombe Park and Blackheath policy due to detailed requirements for the preservation and enhancement of heritage assets including the World Heritage Site, and from the Woolwich policy which reinforces Woolwich's role as a cultural hub and supports regeneration that responds sensitively to heritage designations.

Objective 9: Revitalise town centres, high streets and cultural assets

This is a very strong area of contribution with all spatial area policies having a positive impact on meeting this objective due to reinforcing existing centres with a vibrant mix of uses and supporting the creation of new centres in North Greenwich, Charlton and Kidbrooke Village. The most significant impacts are from the Greenwich, Westcombe Park and Blackheath policy which supports several centres providing bespoke policy direction for each centre's growth and distinctiveness; the Woolwich policy which reinforces the Town Centre's role as the borough's civic, cultural, retail, leisure, and employment hub and supports a diversified evening and night-time economy and the Thamesmead and Abbey Wood policy which supports the rejuvenation of the Thamesmead town centre around a new DLR station, as a vibrant hub for retail, leisure, employment and community life.

Objective 10: Support and promote inclusive economic growth and boost employment opportunities

There are positive contributions towards meeting this objective from 5 of the 8 spatial area policies, (P1, P2, P3, P4 and P5), due to their emphasis on protecting employment land and encouraging a mix of development to support new jobs. Greenwich Peninsula and Charlton make a more significant contribution: the Greenwich Peninsula policy supports the creation of 15,000 new jobs and the delivery of employment space for the cultural and creative industries; the Charlton policy supports the delivery of 1,000 new jobs, the safeguarding and intensification of existing employment land for a range of industrial, logistics and waste management uses and nurtures the creative and cultural economy.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

There are positive contributions towards meeting this objective from 6 of the 8 spatial area policies, (P1, P2, P3, P4, P5 and P7), due to their emphasis on encouraging active travel, improving public transport infrastructure and supporting inclusive and sustainable development to provide homes and jobs.

5.2 Housing Policies

This section of the Local Plan aims to deliver high-quality, inclusive, and sustainable homes that meet the diverse needs of Royal Greenwich's residents across all life stages. It promotes affordability, accessibility, and design excellence through the following policies:

- H1 Meeting housing needs
- H2 Affordable housing
- H3 Housing mix
- H4 Build to Rent
- H5 Large-scale purpose-built shared living
- H6 Purpose-built student accommodation
- H7 Sub-divisions and conversions to Houses in Multiple Occupation (HMOs)
- H8 Supported and specialist accommodation
- H9 Small sites
- H10 Gypsy and Traveller accommodation
- H11 Housing quality

No impacts have been identified on objectives 2 'Enhance the Public Realm' or 10 'Support and promote inclusive economic growth and boost employment opportunities'. There are no negative impacts across any of the policies.

Objective 1: Encourage sustainable transport and enhance connectivity

Policies H1, H4, H5, H6, H7 contribute positively towards meeting this objective by promoting new housing development in well-connected areas, thereby reducing the reliance on private vehicles.

Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

This is the strongest area of contribution with all policies making a positive contribution, and most making a significant contribution towards the housing

objective, by increasing supply, improving affordability, and ensuring housing meets diverse needs.

Objective 4: Build resilient and inclusive communities

Most of the housing policies contribute positively by promoting social inclusion, reducing inequalities, and supporting mixed and balanced neighbourhoods.

Objective 5: Respect the Royal Borough's open spaces

Policies H4, H5, H6 contribute positively by requiring the provision of new amenity space and improving access to existing open spaces through location requirements.

Objective 6: Accelerate sustainable, climate resilient development

Policy H11 contributes positively to this objective by promoting energy-efficient and climate-resilient housing design.

Objective 7: Improve environmental resilience and resource efficiency

Policies H9 and H11 contribute positively towards meeting this objective; Policy H9 by protecting biodiversity on small sites and H11 by promoting sustainable waste management.

Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

Policies H7 and H9 contribute positively by ensuring development respects local character and identity.

Objective 9: Revitalise town centres, high streets and cultural assets

Policies H1, H4, H5 and H6 direct residential development to highly accessible locations, which includes town centres and high streets. Such development contributes positively to the revitalisation of town centres.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

This is a strong area of contribution with all policies making a positive contribution, and many making a significant contribution towards the housing objective, principally since access to a safe and appropriate home is strongly linked to health and wellbeing.

5.3 Economy Policies

This section of the Local Plan aims to foster a resilient and inclusive economy which supports a diverse range of businesses and provides meaningful employment opportunities for all residents through the following policies:

- E1 Inclusive Economy
- E2 Protected industrial land
- E3 Non--Designated Employment Sites
- E4 Delivering inclusive growth
- E5 Local employment, skills and training
- E6 The visitor economy.

No impacts have been identified on objectives 2 'Enhance the public realm' or 5 'Respect the Royal Borough's open spaces'. There are no negative impacts across

any of the policies.

Objective 1: Encourage sustainable transport and enhance connectivity

Several policies contribute positively to this objective by encouraging development in well-connected areas. Policies E1, E3, and E4 promote the location of business floorspace in town centres and designated employment areas, which supports sustainable travel patterns and reduces reliance on private vehicles. E2 adds value by supporting sustainable freight movement, aligning with broader transport efficiency goals.

Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

Policies E2, E3 and E4 contribute positively to this objective. Policies E2 and E3 safeguard land for industrial / employment uses, indirectly leaving land available elsewhere for residential development. Both policies allow for co-location or redevelopment in certain contexts, supporting housing provision. Policy E4 provides for live/work units and ensures that they are appropriately sited and managed.

Objective 4: Build resilient and inclusive communities

There is a consistent positive contribution across policies E1, E3, E4, E5 and E6. These policies promote social inclusion and community resilience by supporting local employment and access to training and workspace. They help reduce economic inequalities, particularly through targeted support for disadvantaged groups.

Objective 6: Accelerate sustainable, climate resilient development

Only Policy E2 contributes to this objective, and the effect is mixed. While it supports carbon reduction through land optimisation and sustainable freight, industrial processes may also increase emissions. The policy's impact on climate resilience depends on industrial uses.

Objective 7: Improve environmental resilience and resource efficiency

Only Policy E2 contributes to this objective. Directing industrial / employment uses to safeguarded areas, indirectly results in environmental benefits to communities away from these areas from reduction in potential emissions and vehicle movements.

Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

Policy E6 makes a major positive contribution by preserving local heritage and identity. It protects pubs and cultural assets, reinforces the borough's cultural distinctiveness and supports heritage-led regeneration.

Objective 9: Revitalise town centres, high streets and cultural assets

Policies E4 and E6 both contribute significantly. E4 supports affordable workspace in retail centres, encouraging commercial diversification and attracting creative industries. E6 enhances town centre vibrancy through cultural and visitor-related uses, strengthening the night-time economy and improving public realm quality.

Objective 10: Support and promote inclusive economic growth and boost employment opportunities

This is the strongest area of contribution across all policies. E1, E2, E3, E4, E5, and E6 all support job creation, business resilience, and inclusive growth. They promote affordable workspace, protect employment land, and encourage local supply chain

engagement. Collectively, these policies underpin the borough's economic strategy and regeneration ambitions.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

Policies E1, E2, E3, and E4 contribute minor positive effects by linking employment opportunities to improved wellbeing. E6 makes a contribution through the provision of public toilets. E5 stands out with a major positive effect, with targeted employment and training reducing inequalities.

5.4 Town Centre Policies

This section of the Local Plan aims to promote vibrant, inclusive and resilient town centres that serve as the heart of community life, supporting a diverse mix of uses and contributing to the borough's economic, cultural and social wellbeing through the following policies:

- TC1 Supporting the Network and Hierarchy of Centres
- TC2 Managing Edge-of-Centre and Out-of-Centre Uses
- TC3 Culture, Evening and Night-Time Economy Uses
- TC4 Markets, Events and Pop-Up Spaces
- TC5 Meanwhile Uses
- TC6 Hot Food Takeaways and Gambling Uses
- TC7 Social and Community Infrastructure

No impacts have been identified on objectives 5 'Respect the Royal Borough's open spaces', 6 'Accelerate sustainable, climate resilient development' and 7 'Improve environmental resilience and resource efficiency'. There are no negative impacts across any of the policies.

Objective 1: Encourage sustainable transport and enhance connectivity

Policy TC1 contributes positively towards meeting this objective. It supports sustainable transport by promoting well-distributed town centre facilities and services, enabling 15-minute neighbourhoods and reducing reliance on private vehicles. It encourages mixed-use development in areas well-served by public transport.

Objective 2: Enhance the public realm

The majority of the policies contribute towards meeting this objective. Policies TC1, TC3, TC4, TC5 and TC7 promote activation of the public realm through events, markets, and meanwhile uses, and improve safety and accessibility. Policy TC6 reduces the adverse impacts from clustering of hot food takeaways and gambling venues.

Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

Policy TC1 is the only policy to make a positive contribution towards the delivery of housing, through supporting residential and mixed-use developments in town centres and encouraging the conversion of underused upper floors for housing.

Objective 4: Build resilient and inclusive communities

All policies contribute positively towards building resilient and inclusive communities

through a variety of measures including the provision of community infrastructure, activation of public spaces, and a reduction of harmful uses. Policy TC7 makes a major contribution by enhancing access to social and community infrastructure.

Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

Policy TC1 is the only policy to make a positive contribution towards this objective, which it does by supporting proposals that enhance the unique character and heritage of centres.

Objective 9: Revitalise town centres, high streets and cultural assets

This is the strongest area of contribution with all policies making a positive contribution and most having a significant impact. Policies aim to revitalise town centres, support a diverse mix of uses and events and enable vibrant day and night-time economies.

Objective 10: Support and promote inclusive economic growth and boost employment opportunities

Policies TC1, TC2 and TC3 promote town centres as economic hubs, supporting local businesses, and enabling diverse commercial activities. Policies TC4 and TC5 supporting local enterprise.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

The majority of the policies contribute towards health and wellbeing. Policy TC6 makes a major contribution by reducing access to unhealthy food and restricting gambling venues, improving public health. Policies TC1, TC3, TC4, and TC5 contribute through public realm improvements and the activation of spaces improving community safety.

5.5 Design and Heritage Policies

This section of the Local Plan aims to secure high-quality, inclusive and sustainable design across all development, while celebrating and protecting Royal Greenwich's rich historic environment. It promotes heritage-led regeneration and placemaking through the following policies:

- DH1 Principles for High Quality Design
- DH2 Tall Buildings
- DH3 Public Realm
- DH4 Heritage Assets
- DH5 Maritime Greenwich World Heritage Site
- DH6 Strategic and Local Views
- DH7 Shopfronts, Advertisements and Signage
- DH8 Thames Policy Area

No impacts have been identified on objective 10 'Support and promote inclusive economic growth and boost employment opportunities'

Objective 1: Encourage sustainable transport and enhance connectivity

Policies DH1 and DH8 make a positive contribution to meeting this objective. Policy DH1 promotes walkable environments and active travel infrastructure. Policy DH8

supports sustainable transport using the River Thames for passenger services and for freight movement and the provision of a continuous riverside footpath and cycleway.

Objective 2: Enhance the public realm

All policies contribute towards meeting this objective through measures such as improved accessibility, safety, placemaking, and heritage-sensitive design. Policy DH3 makes a major contribution with public realm considered a fundamental component of development to be enhanced across the Borough.

Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

Policies DH1 and DH2 make major positive contributions by supporting increased housing supply through design-led intensification and tall buildings. Policy DH5 has a minor negative effect due to restrictions on development within heritage areas.

Objective 4: Build resilient and inclusive communities

Policies DH1, DH2 and DH3 contribute towards the delivery of safe and sustainable neighbourhoods through the promotion of inclusive, safe, and accessible spaces, by supporting social cohesion, and through the enhancement of community infrastructure through design and public realm improvements.

Objective 5: Respect the Royal Borough's open spaces

The majority of policies contribute towards meeting this objective. Policies DH1, DH3, DH4, DH5, DH6, and DH8 promote urban greening, protect historic parks and gardens, and enhance access to open spaces and riverside areas.

Objective 6: Accelerate sustainable, climate resilient development

Policy DH1 makes a major positive contribution by requiring climate-adaptive design and sustainable construction. Policy DH2 contributes through requirements for energy-efficient design and flood risk mitigation.

Objective 7: Improve environmental resilience and resource efficiency

Policy DH1 makes a major positive contribution to meeting this objective through encouraging efficient use of land and optimising density, and by promoting resource efficiency and flood mitigation. Policies DH3 and DH8 contribute through requirements such as sustainable materials, climate adaptation, flood mitigation and biodiversity enhancements. Policy DH2 has a mixed effect; positive in enabling the efficient use of land and requirements for sustainable construction; negative in the possible impacts on sunlight and daylight and adverse wind effects.

Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

This is the strongest area of contribution, with all policies making a positive contribution to meeting the objective. Policies DH4 and DH5 have a major positive effect ensuring development respects and preserves existing heritage assets, whilst supporting positive placemaking that highlights the borough's rich history. The remainder of the policies make a minor contribution to the objective by enhancing local character and conserving heritage assets.

Objective 9: Revitalise town centres, high streets and cultural assets

Policies DH2, DH3 and DH7 contribute towards meeting this objective, by increasing

footfall through residential development in town centres, and by public realm and other improvements supports that positively impact on the character, appearance, safety and vitality of town centres.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

Policy DH3 makes a major positive contribution through public realm improvements and the promotion of the Healthy Streets approach which encourages active travel and is fundamental to the wellbeing of communities. Policies DH1 and DH8 make a lesser contribution supporting safe access to green and riverside spaces.

5.6 Environment Policies

This section of the Local Plan aims to foster a resilient and sustainable environment that enhances community wellbeing, supports biodiversity, and builds climate resilience through the following policies:

- EN1 Green and Blue Infrastructure
- EN2 Open Space
- EN3 Biodiversity
- EN4 Air Quality
- EN5 Local Environmental Impacts
- EN6 Flood Risk and Sustainable Drainage
- EN7 Strategic Waste Management

No impacts have been identified on objectives 3 'Boost the supply of high-quality housing of all types and tenures to address a range of needs', 8 'Sustain and enhance the Royal Borough's culture and built heritage', 9 'Revitalise town centres, high streets and cultural assets', or 10 'Support and promote inclusive economic growth and boost employment opportunities'. There are no negative impacts across any of the policies.

Objective 1: Encourage sustainable transport and enhance connectivity

Only EN7 contributes positively to this objective, by promoting movement of waste by rail and river and supporting London's self-sufficiency in waste management, thereby reducing the need for long-distance waste transport.

Objective 2: Enhance the public realm

Policies EN1 and EN2 contribute towards this objective by promoting new urban planting in public spaces and by supporting the delivery of new or improved open space, improving accessibility.

Objective 4: Build resilient and inclusive communities

Policies EN1, EN2, and EN3 contribute positively to meeting this objective. EN1 and EN2 support inclusive, resilient communities through improved access to green infrastructure and open spaces. EN3 enhances community wellbeing by protecting biodiversity and natural habitats, which are integral to local identity.

Objective 5: Respect the Royal Borough's open spaces

Policies EN1, EN2, and EN3 contribute positively to meeting this objective. EN2 strongly protects and enhances designated and non-designated open spaces. EN1

and EN3 support urban greening, biodiversity, and the multifunctional use of open spaces, including for food growing and recreation.

Objective 6: Accelerate sustainable, climate resilient development

The majority of the policies contribute positively to climate resilience objectives. Policies EN1 and EN3 support carbon uptake and urban cooling through planting and biodiversity. EN2 enhances resilience through open space protection. EN4 promotes sustainable design to reduce emissions. EN6 makes a major contribution by requiring sustainable drainage systems to manage flood risk.

Objective 7: Improve environmental resilience and resource efficiency

This is the strongest area of contribution, with all policies making a positive contribution, and the majority a major positive contribution. The policies will increase greening, improve air quality, help to manage pollution, support environmental resilience and enhance biodiversity

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

All policies except EN7 contribute positively. EN4 and EN5 make major contributions by reducing exposure to air and environmental pollution. EN1, EN2, EN3, and EN6 support mental and physical wellbeing through access to green space, improved environmental quality, and flood-safe development.

5.7 Climate Emergency Policies

This section of the Local Plan sets out a comprehensive and ambitious approach to tackling the climate emergency through planning policy. It aims to ensure that all new development in Royal Greenwich contributes to achieving net zero carbon emissions and enhances climate resilience through the following policies:

- CE1 Climate Resilient and Net Zero Design Principles
- CE2 Operational Carbon and Energy Balance
- CE3 Decentralised Energy
- CE4 Whole Life Carbon and Circular Economy
- CE5 Retrofitting and Existing Buildings

No impacts have been identified on objectives 1 'Encourage sustainable transport and enhance connectivity', 2 'Enhance the public realm' and 10 'Support and promote inclusive economic growth and boost employment opportunities'. There are no negative impacts across any of the policies.

Objective 3: Housing

Policies CE1 and CE2 contribute positively to this objective. Both policies will ensure that new housing is sustainable; Policy CE1 promotes sustainable and climate-resilient housing design and Policy CE2 supports energy-efficient housing.

Objective 4: Build resilient and inclusive communities

Several policies contribute positively to meeting this objective. Policies CE2 and CE3 improve energy security and affordability for households, supporting community resilience. Policy CE4 encourages the use of local reclaimed materials, reducing

reliance on imports and supporting local identity and Policy CE5 encourages retrofitting, helping to retain community landmarks thereby enhancing local identity.

Objective 5: Respect the Royal Borough's open spaces

Only Policy CE1 contributes positively to enhancing open spaces by promoting urban greening as a climate resilient design principle.

Objective 6: Accelerate sustainable, climate resilient development

This is the strongest area of contribution across all policies. All five policies make major positive contributions towards sustainable, climate resilient development and drive the transition to net zero. They promote high standards for sustainable construction, energy efficiency (including retrofit), renewable energy generation, heat networks and the circular economy.

Objective 7: Improve environmental resilience and resource efficiency

There is a consistent positive contribution across all policies, with support for environmental resilience through energy efficiency, reduced emissions and the circular economy. Policies C4 and C5 also contribute through the reduction of construction waste.

Objective 8: Sustain and enhance the Royal Borough's culture and built heritage

Policy CE5 is the only policy to contribute, making a significant contribution through the preservation of historic assets through sensitive retrofitting.

Objective 9: Revitalise town centres, high streets and cultural assets

Policy CE5 is the only policy to contribute, supporting sustainable retrofitting that is sensitive to the fabric of existing buildings, protecting the character of high streets and cultural assets.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

Policies CE1 and CE2 contribute by creating indoor environments that have good thermal efficiency, reducing health risk to residents from extreme heat or cold. Increased comfort for occupants also improves mental health and general wellbeing. In addition the contribution towards reducing the use of fossil-fuels and associated pollutants has longer term health benefits to the wider population.

5.8 Transport Policies

This section of the Local Plan aims to deliver a safe, sustainable and inclusive transport network that supports active travel, reduces car dependency, and enhances public realm and connectivity across the borough through the following policies:

- T1 Active Travel and Cycle Parking
- T2 Car Parking
- T3 Roads and Streets
- T4 Public Transport Improvements
- T5 Freight
- T6 Parking Standards for Disabled People and the Physically Impaired

No impacts have been identified on objective 8 'Sustain and enhance the Royal Borough's culture and built heritage'.

Objective 1: Encourage sustainable transport and enhance connectivity

This is the strongest area of contribution across all policies, with five of the six policies having a significant positive impact towards meeting the objective. Policies T1, T2, T3 and T4 make a major positive contribution by improving public transport, promoting active travel and reducing car dependency. Policy T5 supports sustainable freight movement. Policy T6 has a mixed impact, it improves accessibility for disabled people but may encourage car use.

Objective 2: Enhance the public realm

Policies T1 and T3 make major positive contributions towards this objective by enhancing walking environments and street design. Policy T2 has a mixed impact, the reduction of the dominance of the car should improve car dominance, however, it may lead to illegal parking which can impact negatively on the public realm.

Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs

Policy T4 makes a positive contribution to the supply of new housing, since public transport improvements allow for higher density development.

Objective 4: Build resilient and inclusive communities

Policies T1, T3 and T6 make minor positive contributions towards creating sustainable communities by improving safety, accessibility, and inclusion.

Objective 5: Respect the Royal Borough's open spaces

Policies T1 and T3 make minor positive contributions towards this objective by improving access and promoting urban greening.

Objective 6: Accelerate sustainable, climate resilient development

Five of the six policies contribute positively to this objective, Policies T1, T2, T3, T4 and T5 all support modal shift which in turn reduces carbon emissions.

Objective 7: Improve environmental resilience and resource efficiency

Five of the six policies have a positive contribution towards meeting this objective since the modal shift to public transport and active travel and the promotion of sustainable freight will lead to improved air quality. Reduced areas of parking, will reduce surface water runoff and improve land efficiency. Policy T6, however, has a negative impact since it could lead to increased car use.

Objective 9 Revitalise town centres, high streets and cultural assets

Policy T4 makes a minor positive contribution towards this objective since improvements to public transport will create a more pedestrian friendly environment in town centres.

Objective 10: Support and promote inclusive economic growth and boost employment opportunities

Policy T5 contributes a minor positive effect to this objective through supporting safeguarding of wharves, railheads and the aggregates zone which are important for certain sectors of the local economy.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

Policy T1 makes a significant positive impact through encouraging active travel which is beneficial for both physical and mental health. Policies T3 and T6 contribute minor positive effects by improving safety and accessibility.

5.9 Key findings from the Habitats Regulations Assessment

The HRA Screening Report assessed the potential impacts of the Royal Greenwich Local Plan (2022–2037) on European and Ramsar sites within a 15km radius of the borough boundary. Three sites were identified for detailed consideration: Epping Forest SAC, Lee Valley SPA/Ramsar, and Wimbledon Common SAC.

The assessment concluded that due to the significant distance from Royal Greenwich, lack of direct transport links, and the Local Plan's emphasis on sustainable transport and local open space provision, the proposed development is unlikely to result in significant recreational pressure, air quality deterioration, or water resource impacts on these sites.

For each site, the screening found no likely significant effects arising from the Local Plan. Recreational impacts were considered minimal due to the Royal Borough's location outside the core catchment areas, and air quality impacts were mitigated by the Plan's policies promoting reduced car use. Water resource concerns were addressed through Thames Water's management and infrastructure resilience. As a result, the HRA process concluded at the screening stage, with no requirement for Appropriate Assessment.

The full Habitats Regulations Assessment Screening is attached as Appendix 3.

5.10 Key findings from the Health Impact Assessment

In undertaking the Health Impact Assessment, a set of key questions was formulated to assess how policies contribute to health outcomes. These questions were mapped against the priorities of the Royal Greenwich Health and Wellbeing Strategy and the policy areas of the draft Local Plan. Each policy area was assessed against the key health questions to identify which draft policies support specific health outcomes. Detailed commentary was provided for each policy chapter, highlighting the specific ways in which policies contribute to physical and mental wellbeing.

The Health Impact Assessment demonstrates that the draft Local Plan policies have the potential to significantly enhance the health and wellbeing of Royal Greenwich's residents. By aligning with the Royal Borough's Health and Wellbeing Strategy and addressing key social determinants of health, such as housing, transport, environment, and access to services, the Plan promotes inclusive, resilient communities.

The integration of health considerations across policy areas ensures that future development contributes positively to physical and mental wellbeing, reduces health inequalities, and supports equitable outcomes for all. Continued monitoring of health

impacts will be essential to ensure these benefits are realised throughout the implementation of the Plan.

The full Health Impact Assessment is attached as Appendix 4.

5.11 Key findings from the Equalities Impact Assessment

In undertaking the Equalities Impact Assessment, a structured framework was developed to assess how draft Local Plan policies may impact groups protected under the Equality Act 2010. Each policy area was reviewed against protected characteristics, to identify the extent and nature of potential impacts. Impacts were categorised as 'high', 'medium', 'low', or 'none', and supported by detailed commentary for each policy chapter.

The assessment was informed by the Integrated Impact Assessment (IIA), which identified relevant sub-criteria linked to equality outcomes. These criteria were mapped against the Local Plan's policy areas to evaluate how policies contribute to inclusive and equitable development.

The Equalities Impact Assessment demonstrates that the draft Local Plan policies are broadly supportive of promoting equality and inclusion across Royal Greenwich. Positive impacts were identified across all policy areas, particularly for age, disability and socio-economic background. Indirect benefits were noted for race, religion or belief, and caring responsibilities. Limited direct references were found for gender, sexual orientation, gender identity, and pregnancy/maternity, although general inclusivity measures offer indirect support. While no negative impacts were identified, the assessment highlights opportunities to strengthen inclusion through more explicit references to gender, LGBTQ+ inclusion, and maternity needs.

The integration of equality considerations across policy areas ensures that future development contributes positively to inclusive growth, social cohesion, and equitable outcomes. Ongoing engagement with communities and monitoring of equality impacts will be essential to ensure these benefits are realised throughout the implementation of the Plan.

The full Equalities Impact Assessment is attached as Appendix 5.

6 Monitoring

The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.

Potential indicators for monitoring the sustainability effects of implementing the Local Plan are set out below.

IIA Objective	Potential Monitoring Indicator
1: Encourage sustainable transport and enhance connectivity	<ul style="list-style-type: none"> • Healthy Streets Scorecard Result
2: Enhance the public realm	<ul style="list-style-type: none"> • Number of developments successful at award schemes • Number of developments achieving Secured by Design
3: Boost the supply of high-quality housing of all types and tenures to address a range of needs	<ul style="list-style-type: none"> • Housing permissions / completions • Affordable housing permissions / completions • Housing size (no. of beds) • Build to Rent permissions / completions • Large purpose built shared living permissions / completions • Purpose built student accommodation permissions / completions • Conversion to HMO permissions / completions • Net additional pitches for Gypsies and Travellers
4: Build resilient and inclusive communities	<ul style="list-style-type: none"> • Amount of floorspace delivered for community uses.
5: Respect the Royal Borough's open spaces	<ul style="list-style-type: none"> • Net change in open space provision
6: Accelerate sustainable, climate resilient development	<ul style="list-style-type: none"> • Total energy use and renewable energy generation in new major developments • Number of qualifying developments meeting or exceeding a Space Heating Demand (SHD) of 15 kWh/sqm GIA/yr. • Number of qualifying developments meeting or exceeding the Energy Use Intensity (EUI) targets set out in the Plan
7: Improve environmental resilience and resource efficiency	<ul style="list-style-type: none"> • Average air pollutant levels • Changes to biodiversity status of SINCs • % developments achieving >10% BNG
8: Sustain and enhance the Royal Borough's culture and built heritage	<ul style="list-style-type: none"> • Number of buildings on Historic England's Buildings at Risk Register

9: Revitalise town centres, high streets and cultural assets	<ul style="list-style-type: none"> • Town Centre vacancy rates
10: Support and promote inclusive economic growth and boost employment opportunities	<ul style="list-style-type: none"> • Employment / unemployment rate • Contributions to GLLaB • Affordable workspace delivered • Gains / losses in employment floorspace
11: Improve the quality of life, safety and health and wellbeing of communities	<ul style="list-style-type: none"> • Life expectancy • Obesity rates in adults and children • Planning applications for hot food takeaways

This will be refined alongside the next iteration of the Local Plan at Regulation 19 Publication stage. As the Local Plan is implemented and the likely significant effects become more certain, the Council may narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.

It is the intention that monitoring results will be reported through the Council's Authority Monitoring Report (AMR).

7 Next Steps

This Integrated Impact Assessment Report has been prepared to accompany the Regulation 18 consultation for the Royal Greenwich Local Plan.

Consultees are invited to comment on the Scoping Report and Integrated Impact Assessment as set out in Section 1 of this document. Consultation responses received will be considered and if necessary, the scope of the assessment will be reviewed and the IIA framework refined.

Local Plan policies may be amended following the consultation and these revised policies will be subject to a further Integrated Impact Assessment which will be published alongside the Regulation 19 consultation for the Local Plan.

Appendix 1: Scoping Report

Royal Borough of Greenwich Local Plan

Scoping Report Consultation Draft

December 2025

Table of Contents

Reference:	Section:	Page number:
1	Introduction	3
1.1	What is the Scoping Report	3
1.2	The Integrated Impact Assessment Approach	3
2	Baseline Information	8
2.1	Economic Conditions	8
2.2	Social Conditions	19
2.3	Environmental Conditions	28
3	Relevant Plans, Programmes and Strategies	47
4	Sustainability Objectives	51
5	The IIA Assessment Framework	53
6	Next Steps	57

List of Figures

- Figure 1:** Sustainability Appraisal Process
- Figure 2:** Most common sectors of job postings in Royal Greenwich
- Figure 3:** Relative size of industry sectors in the UK, by number of enterprises
- Figure 4:** Industry sectors by gross value-added output in Royal Greenwich
- Figure 5:** Opportunity Areas within Royal Greenwich
- Figure 6:** Strategic Industrial Locations (SIL) within Royal Greenwich
- Figure 7:** Employment Floorspace by Spatial Region
- Figure 8:** Map of Royal Greenwich's Retail Centres
- Figure 9:** Eltham Retail Transaction Amount Index
- Figure 10:** Woolwich Retail Transaction Amount Index
- Figure 11:** Deprivation deciles for areas in Royal Greenwich
- Figure 12:** Life expectancy at birth by Borough for men and women
- Figure 13:** Trends in housing prices in Royal Greenwich since 2014
- Figure 14:** Location of Royal Greenwich's Conservation Areas
- Figure 15:** Strategic and Local Views within Royal Greenwich
- Figure 16:** Metropolitan Open Land and Community Open Space
- Figure 17:** Areas of Deficiency in access to open space
- Figure 18:** Sites of Importance for Nature Conservation
- Figure 19:** Biodiversity Hotspots
- Figure 20:** Air Quality Focus Areas
- Figure 21:** Climate Risk map for Royal Greenwich
- Figure 22:** Flood Zones within Royal Greenwich
- Figure 23:** Noise level contours for London City Airport
- Figure 24:** PTAL levels for Royal Greenwich
- Figure 25:** National Cycle Network Routes in Royal Greenwich
- Figure 26:** TfL Cycle Routes in Royal Greenwich

Introduction

1.1 What is the Scoping Report?

A new Local Plan is being prepared for Royal Greenwich. This will cover the period 2022-2037 and will set out Royal Greenwich's vision, strategy and policies and allocate sites for development. The policies within the draft Local Plan have been shaped by previous engagement and consultation with stakeholders through a "Big Themes" consultation in 2023 and a "Call for Sites" exercise in 2024, and a number of evidence base documents on a variety of issues. The new Local Plan will replace the existing Core Strategy, adopted in 2014, and form the Development Plan for the Borough alongside the London Plan.

This scoping report has been prepared as the first stage of the preparation of the Integrated Impact Assessment (IIA) for the Royal Greenwich Local Plan. It sets out baseline data and identifies key issues which provide the context for the Local Plan. The report proposes a set of objectives against which the council will appraise the environmental, social and economic sustainability impacts, and equalities and health effects of the policies in the draft Local Plan and develops an IIA Framework.

The IIA framework is the methodology with which the impacts and effects of the Local Plan policies are being analysed, compared and critically assessed on a systematic basis. This scoping report aims to provide sufficient information on the approach being taken and seeks feedback to help inform the later stages of the preparation of the IIA.

1.2 The Integrated Impact Assessment Approach

Under Section 19 (5) of the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) is required for all development plan documents, which include local plans. An SA should incorporate a Strategic Environmental Assessment for the purposes of the EU Strategic Environmental Assessment Directive EC/2001/42 and the UK Environmental Assessment of Plans and Programmes Regulations 2004.

An Integrated Impact Assessment fulfils the statutory requirements for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). It will also provide the basis for the council to consider the equalities impacts to enable it to comply with the Public Sector Equalities Duty (section 149 of the Equality Act 2010). Although not a statutory requirement, a Health Impact Assessment will also be included in the IIA, as good practice, to help the council ensure policies reduce health inequalities where possible. Finally, the IIA will incorporate a Habitats Regulations Assessment (HRA) to meet Regulation 63 of the Conservation of Habitats and Species Regulations 2017.

The integrated approach avoids the need to undertake and report on separate assessments, reducing duplication of assessment work and helping those considering and commenting on the council's proposals to understand the proposed policies and their potential effects. As many of the issues considered in the assessments overlap in practice, integrating the assessments in this way ensures an inclusive approach that informs the development of plan policies.

The IIA is an iterative process that allows for the consideration of the impacts of emerging policies and for alterations and mitigations of any adverse impacts that may be identified.

Sustainability Appraisal (SA)

Section 191 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. Section 392 of the Act requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development”. The appraisal should include an assessment of the likely significant impacts (economic, social and environmental) of the plan. The SA should incorporate a Strategic Environmental Assessment for the purposes of the EU Strategic Environmental Assessment Directive EC/2001/42.

National Planning Policy Framework 2024 Paragraph 333 states that “Local Plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements”. National Planning Policy Guidance (NPPG) paragraph 0064 encourages that “work (on the sustainability appraisal process) to start at the same time that work starts on developing the plan” Paragraph 013 of the NPPG includes a flowchart which shows the relationship between the Local Plan preparation and Sustainability Appraisal. (Figure 1)

Strategic Environmental Assessment (SEA)

Annex 1 of the SEA Directive states that the assessment should include information on the likely significant effects on the environment, including on issues such as;

- (i) biodiversity;
- (ii) population;
- (iii) human health;
- (iv) fauna;
- (v) flora;
- (vi) soil;
- (vii) water;
- (viii) air;
- (ix) climatic factors;
- (x) material assets;
- (xi) cultural heritage, including architectural and archaeological heritage;
- (xii) landscape;
- (xiii) the inter-relationship between the issues referred to in subsections (i) to (xii)

Paragraph 165 of the National Planning Policy Framework states that “A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and

¹ Legislation.gov.uk - [Planning and Compulsory Purchase Act 2004](#)

² Legislation.gov.uk - [Planning and Compulsory Purchase Act 2004](#)

³ National Planning Policy Framework 2024 - [National Planning Policy Framework - 3. Plan-making - Guidance - GOV.UK](#)

⁴ National Planning Practice Guidance - [Strategic environmental assessment and sustainability appraisal - GOV.UK](#)

should consider all the likely significant effects on the environment, economic and social factors.”

The Scoping Report responds to stage ‘A’ (See Figure 1) of the SA and SEA process.

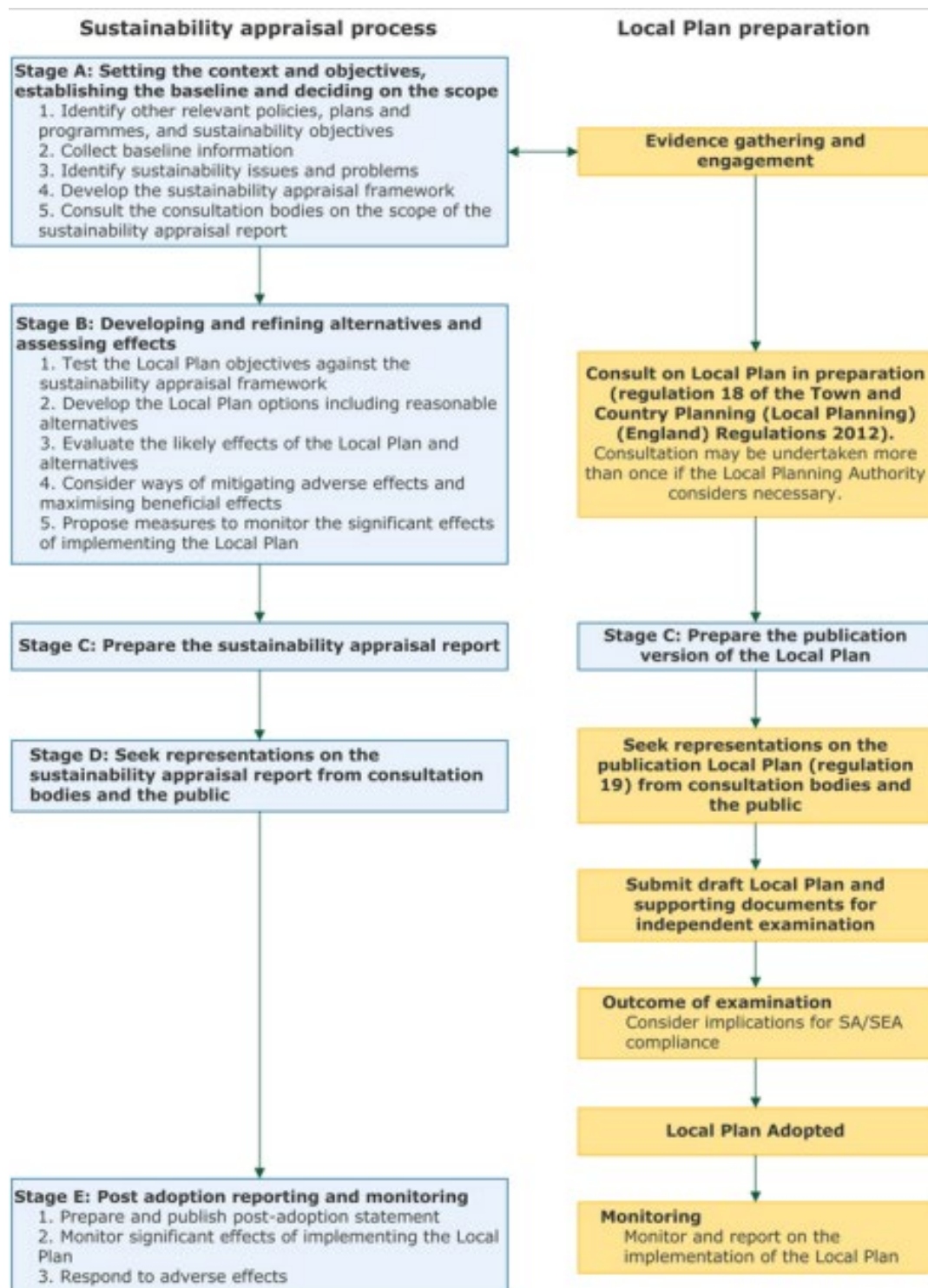


Figure 1: Sustainability Appraisal Process (National Planning Policy Guidance) (Source NNPG)

Equalities Impact Assessment (EqIA)

The Royal Borough has a statutory duty to consider the equality impacts of its decisions. An Equalities Impact Assessment (EqIA) is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. The Act extended the previous duties to cover the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race - including ethnic or national origins
- Colour or nationality
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation.

The equalities duty has three aims. It requires public bodies to have due regard to the need to:

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

Having 'due regard' for advancing equality involves having regard to the need to:

1. Remove or minimise disadvantages suffered by people due to their protected groups;
2. Take steps to meet the needs of people from protected groups where these are different from the needs of other people; and
3. Encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The Equality Act 2010 also provides rights for people not to be directly discriminated against or harassed because they have associations with someone who has a protected characteristic.

Health Impact Assessment (HIA)

While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIAs at a policy level in a variety of policy documents and they are increasingly being seen as best practice. The purpose of an HIA is to ensure that where possible, policies actively promote healthy living for the local population, reduce health inequalities and do not actively damage health. This is particularly important in light of the Health and Social Care Act 2012 which transferred statutory responsibility for local population health improvement to local authorities, and the Royal Greenwich Health and Wellbeing Strategy 2023-2028.

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

The physical environment is shaped by planning decisions which can facilitate or deter a healthy lifestyle, affect the quality and safety of the environment, encourage or discourage employment and training opportunities, enhance or harm social networks and nurture or neglect opportunities for a rich community life. An HIA identifies actions that can enhance positive effects on health, reduce or eliminate negative effects, and reduce health and social inequalities that may arise through planning decisions. It considers how and to what extent proposed policies are likely to affect the health of people in Royal Greenwich and recommends changes to improve outcomes.

Royal Greenwich's Health and Wellbeing Strategy 2023-2028⁵ sets out its priorities to improve the health and wellbeing of Royal Greenwich's residents, the priorities up to 2028 are as follows:

- **Start well:** Children and young people get the best start in life and can reach their full potential.
- **Be well:** Everyone is more active and can access nutritious food.
- **Feel well:** There are fewer people who experience poor health as a result of addiction dependency. Fewer adults are affected by poor mental health and fewer children and young people are affected by poor mental health.
- **Stay well:** For everyone to access the services they need on equitable footing. Effective integrated community teams based in neighbourhoods provide the right to support when and where it is needed. Reduce unfair and avoidable differences in health & wellbeing.
- **Age well:** Health and care services support people to live fulfilling and independent lives and carers are supported.

These priorities will be considered in the context of the aspects of the built environment most likely to influence health in Royal Greenwich.

Habitats Regulation Assessment

The IIA will incorporate a Habitats Regulations Assessment (HRA) to meet Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive'). The Directive seeks to provide legal protection of habitats and species that are of European significance. It should be noted that there are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs), or Ramsar sites within or immediately surrounding the Royal Borough of Greenwich. However, the HRA screening will still consider whether any policies or proposals in the plan that may have likely significant effects on any European sites further afield.

⁵ Royal Borough of Greenwich Health & Wellbeing Strategy 2023-2028 - [Health and wellbeing strategy 2023 to 2028 | Royal Borough of Greenwich](#)

Baseline Information

Collecting baseline information is an important part of the scoping process for the IIA and sets out the current conditions in Royal Greenwich. This key information is a starting baseline to help identify the key sustainability issues and problems, establishing the current economic, social and environmental context. It provides the baseline for assessment and then future monitoring of the Local Plan policies. The SEA Directive requires information on the evolution of baseline conditions to help identify whether conditions are already improving or worsening and the rate that they are changing at. As well as the baseline conditions, set out by issue, this section also therefore includes information on projections and trends - 'the likely future conditions' - where this information is available.

2.1 Economic Conditions

Employees

As of 2022, Royal Greenwich had 106,000 jobs, resulting in a jobs density (the ratio of total jobs to the population aged 16–64) of 0.53. This is considerably lower than both the London average (1.07) and the national average (0.87). Notably, Royal Greenwich's jobs density is less than half that of London. In the context of London as a whole, which had 6,455,000 jobs in 2022, Royal Greenwich accounts for only about 1.6% of the capital's total employment.

Of the 88,000 employee jobs in Royal Greenwich, 37.5% are part-time. This proportion is significantly higher than in London (25.8%) and Great Britain (31.2%), indicating that, in addition to a lower jobs density, Royal Greenwich has a greater share of part-time employment.

Job numbers in Royal Greenwich have increased over time, rising from 73,000 in 2002 to 82,000 in 2012, and reaching 106,000 in 2022. However, jobs density has only marginally increased from 0.50 to 0.53 over the same period. In contrast, London's jobs density grew from 0.89 in 2002 to 1.07 in 2022, demonstrating that job growth in London has outpaced that of Royal Greenwich. For comparison, neighbouring boroughs such as Newham saw jobs density rise from 0.43 in 2002 to 0.63 in 2022⁶.

The number of jobs in Greenwich is growing but this is roughly in line with population. Royal Greenwich's employment sector has fewer jobs per inhabitant than London, and more part-time jobs, suggesting significant levels of commuting out of Greenwich to reach full-time jobs.

Businesses

In 2024, Royal Greenwich was home to 9,840 VAT and/or PAYE-registered businesses⁷. Of these, 93% are classified as 'micro' enterprises (employing 0–9 people), a proportion slightly above the London average of 90%.

⁶ NOMIS jobs density [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk)

⁷ ONS, UK business: activity, size and location, [UK business: activity, size and location - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

Figure 2 illustrates the distribution of job postings by sector. The most common sectors for job postings in Royal Greenwich in August 2024 were education, construction, and health and social care, which together accounted for 53.1% of all job postings.

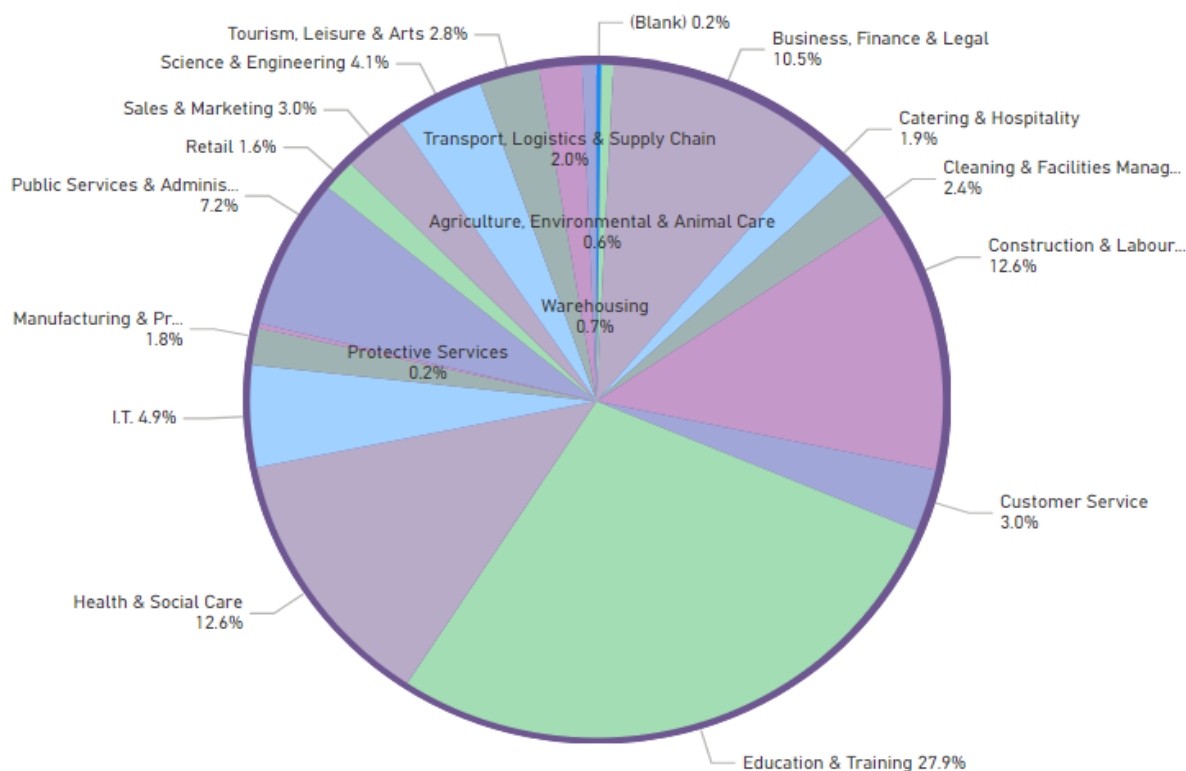


Figure 2: Most common sectors of job postings in Royal Greenwich

Figure 3 shows the relative size of industry sectors in Royal Greenwich, by number of enterprises. Analysis of the business base shows that the three most prevalent sectors by number of enterprises are professional, scientific and technical (17%), construction (15%), and information and communication (11%)⁸

⁸ ONS, UK business: activity, size and location, [UK business: activity, size and location - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/businessandindustry/sectors/activityandsize)

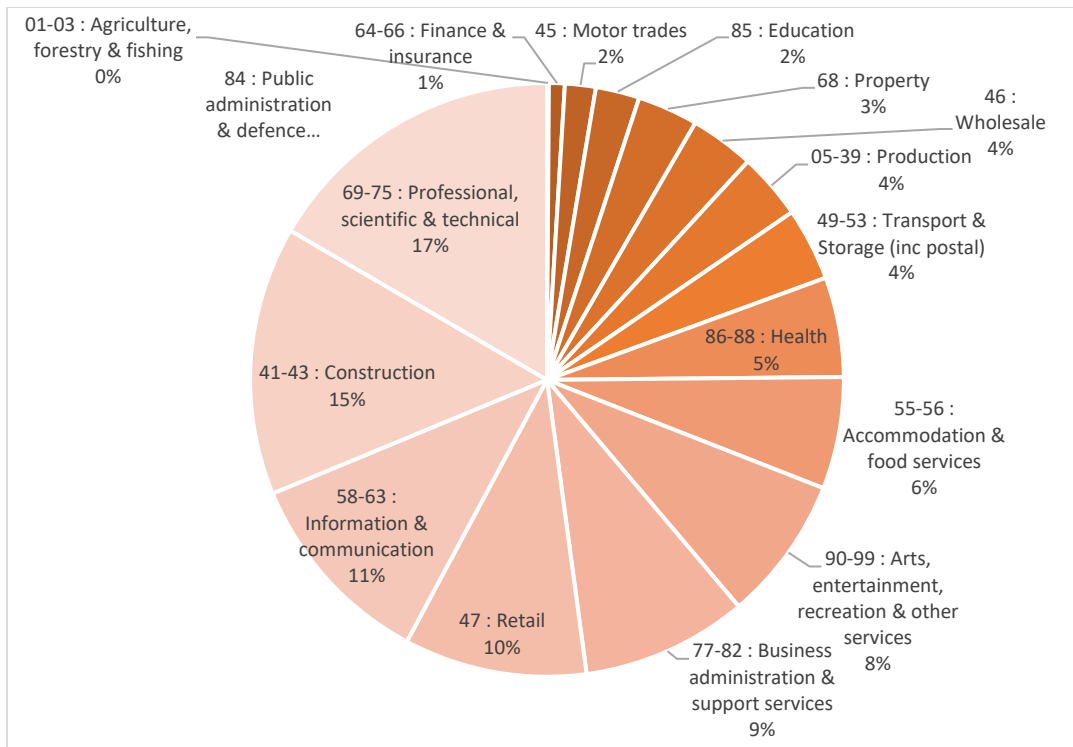


Figure 3: Relative size of industry sectors in the UK, by number of enterprises

Despite the dominance of these sectors by enterprise count, the largest contributor to economic output in Greenwich is the real estate sector. Other significant contributors include “foundational” sectors such as health and social care, construction, education, and public administration (see Figure 4).

Greenwich GVA Output by Sectors 2021

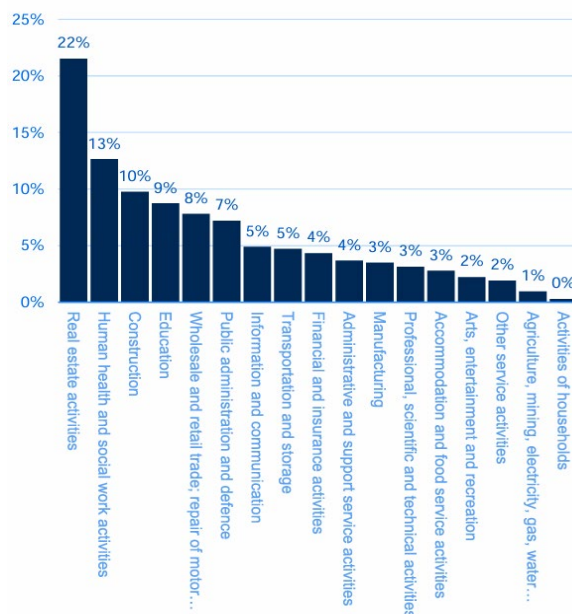


Figure 4 - Industry sectors by gross value added output, Greenwich⁹

⁹ Inclusive Economy Strategy for Royal Borough of Greenwich Evidence Base December 2023, [Inclusive Economy Strategy | Royal Borough of Greenwich](#)

In 2021, the Greenwich economy contributed £5.2 billion to the UK economy.¹⁰ Productivity in Royal Greenwich, measured as output per hour worked, was £37 in 2021, close to the national average of £38, though below the Greater London average of £51. The higher London figure is largely driven by the financial sector, which has a limited presence in Greenwich.¹¹

Business demography data indicates a net loss of 80 businesses (0.8% of the business base) in 2021, likely reflecting the impact of COVID-19-related restrictions. The five-year business survival rate in Greenwich is comparatively low: only 37% of businesses established in 2016 remained active in 2021, two percentage points below the London average and four below the England average.¹²

Employment Locations

The London Plan (2021) designated a number of Opportunity Areas within Royal Greenwich. These are areas where growth should be concentrated to bring about the highest numbers of new jobs and homes. The London Plan identifies an indicative capacity of 25,500 new jobs, and 43,500 new homes in Royal Greenwich's opportunity areas.¹³

As displayed within Figure 5 below, these are located in the north of the Borough at New Cross / Lewisham / Catford (mostly within LB Lewisham), Greenwich Peninsula, Charlton Riverside, Woolwich and Thamesmead / Abbey Wood (also within LB Bexley).

¹⁰ Inclusive Economy Strategy for Royal Borough of Greenwich Evidence Base December 2023, [Inclusive Economy Strategy | Royal Borough of Greenwich](#)

¹¹ Inclusive Economy Strategy for Royal Borough of Greenwich Evidence Base December 2023, [Inclusive Economy Strategy | Royal Borough of Greenwich](#)

¹² Inclusive Economy Strategy for Royal Borough of Greenwich Evidence Base December 2023, [Inclusive Economy Strategy | Royal Borough of Greenwich](#)

¹³ The Greater London Authority, London Plan. (2021). Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

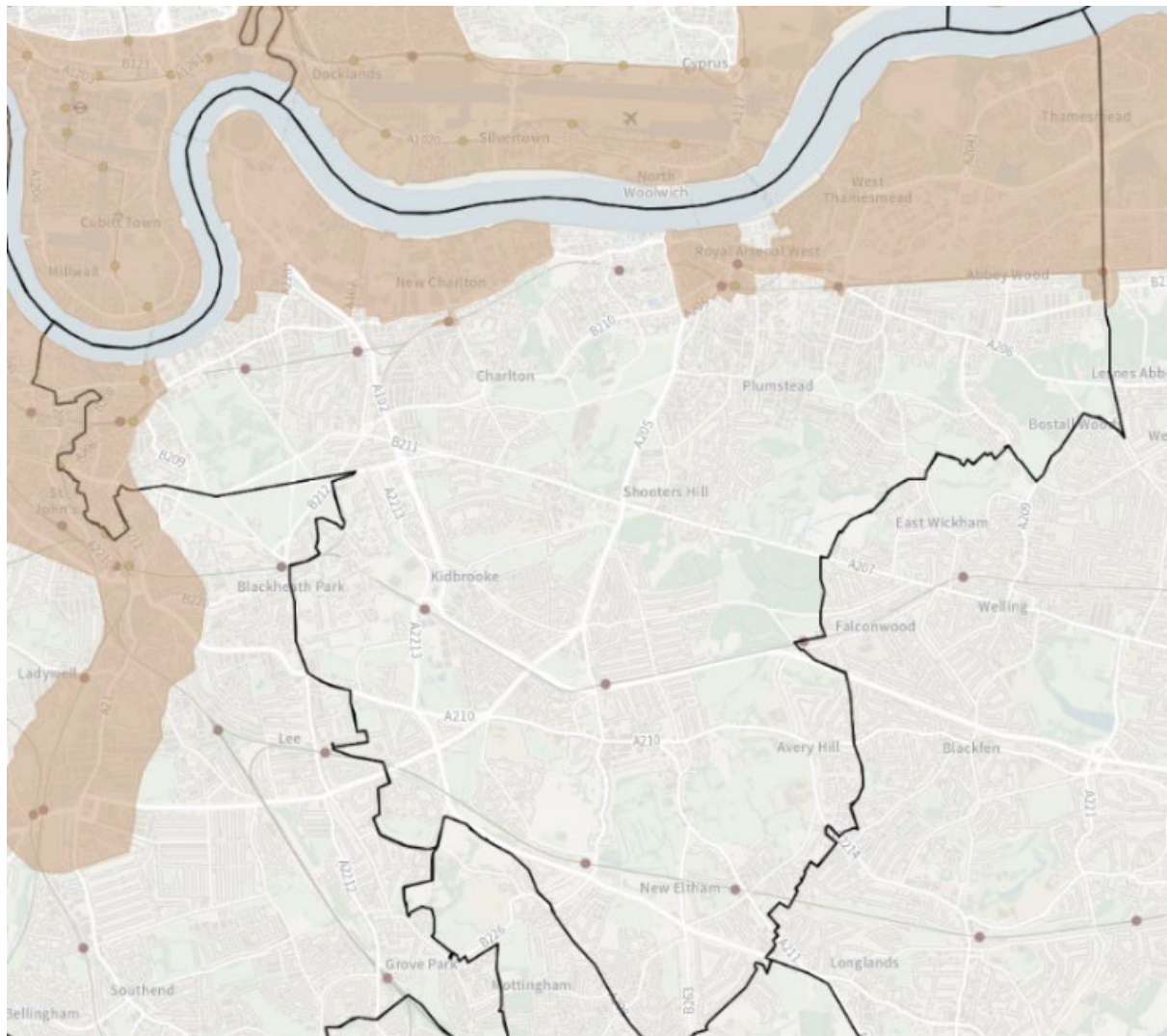


Figure 6 displays the Strategic Industrial Locations (SIL) designated in the Royal Borough of Greenwich, which are all located in the north of the borough. This designation aims to protect these areas as they provide high concentrations of industrial, logistics and other uses that support the functioning of London's economy.¹⁴ Royal Greenwich's SILs include both Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP). PILs are suitable for general industrial, warehousing, waste management use etc., while IBPs are particularly suitable for activities that need better quality surroundings including research and development and light industrial.

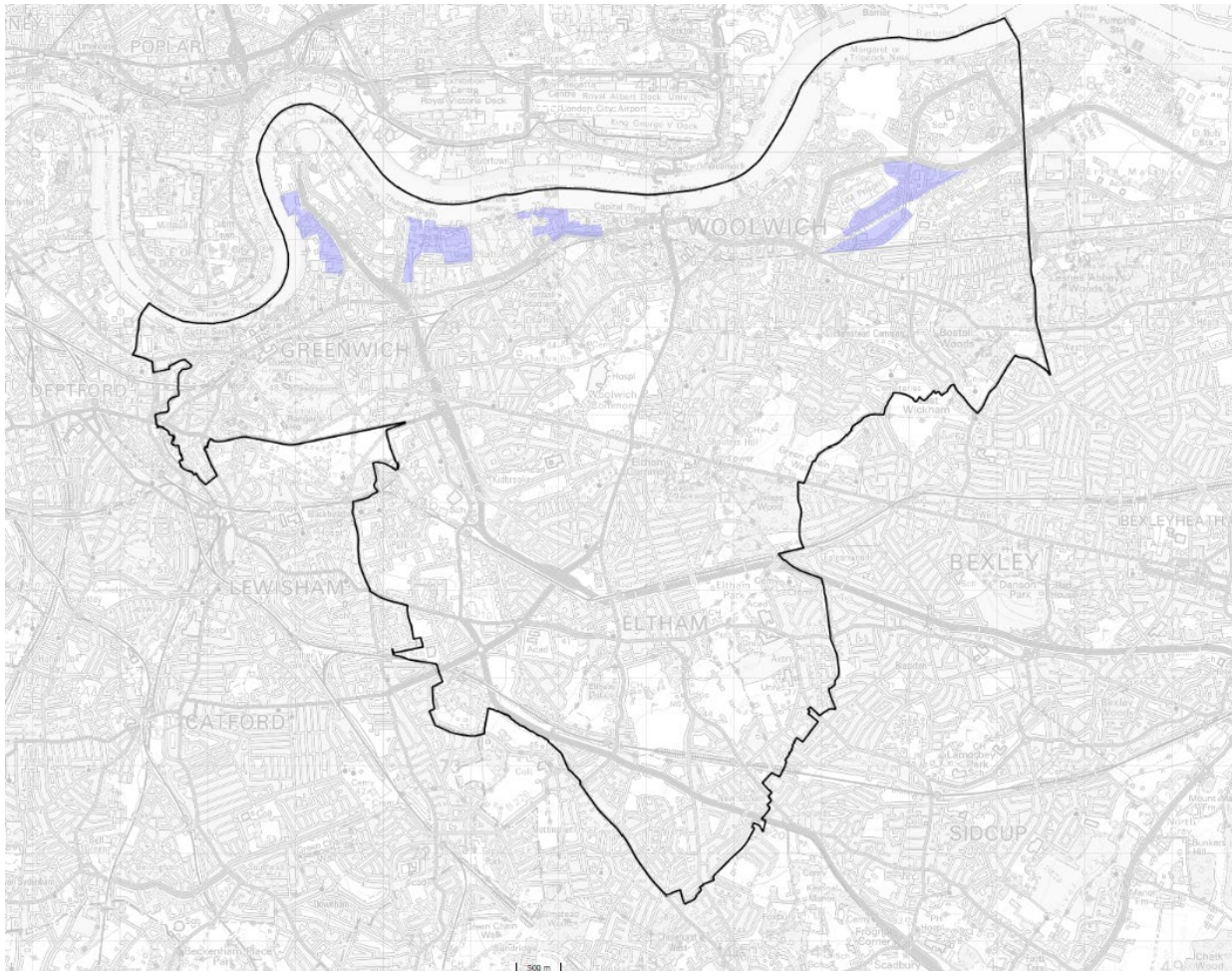


Figure 6: Strategic Industrial Locations (SIL) within RB Greenwich

Figure 7 below, re-iterates that the main locations for employment premises are within the north of the borough, particularly in Greenwich Peninsula, Charlton, Plumstead, Thamesmead and Woolwich¹⁵.

Greenwich's office market is growing. The number of office properties increased from 690 in 2013 to 930 in 2023 (a 35% increase), with the rateable value per metre squared of floorspace increasing from £102 to £130. By comparison in 2023 there were 6,190 rateable properties in all sectors in Royal Greenwich. There has been a steady increase in the percentage of properties in Greenwich which are offices, from 10.5% in 2001, to 13.8% in 2013, to 15.0% in 2023.¹⁶ The Employment Land Review concluded a continued need to plan for office provision.

¹⁵ Employment Land Review, 2025, Lichfields

¹⁶ Valuation Office Agency – note the 2024 numbers have been delayed so 2023 is the current most up to date data [Non-domestic rating: stock of properties, 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/non-domestic-rating-stock-of-properties-2024)

Spatial Region	Office E(g)(i)/(ii)		Light Industrial E(g)(iii)/ Industrial B2		Distribution B8	
	(sq.m)	(%)	(sq.m)	(%)	(sq.m)	(%)
Abbey Wood	2,280	1.1%	6,843	3.0%	7,700	1.1%
Charlton	9,634	4.6%	71,590	31.3%	425,070	59.2%
Eltham & South of the Borough	14,871	7.2%	2,731	1.2%	31,386	4.4%
Greenwich Peninsula	53,267	25.8%	58,729	25.6%	67,300	9.4%
Greenwich Riverside	50,047	24.2%	12,659	5.5%	28,144	3.9%
Plumstead	1,702	0.8%	5,776	2.5%	4,157	0.6%
Thamesmead	3,593	1.6%	50,327	22.0%	105,877	14.8%
Woolwich	71,848	34.7%	20,385	8.9%	47,898	6.7%
Total	207,240	100%	229,040	100%	717,530	100%

Source: VOA Survey (2022 Update)/Lichfields analysis (Totals rounded)

Figure 7: Employment Floorspace by Spatial Region

Town Centres and Retail

Figure 8 below, shows the location of the Royal Borough's two Major Centres, seven District Centres and ten Local Centres. These are where retail, employment and public transport are concentrated, creating a centre of activity for residential areas of the borough.

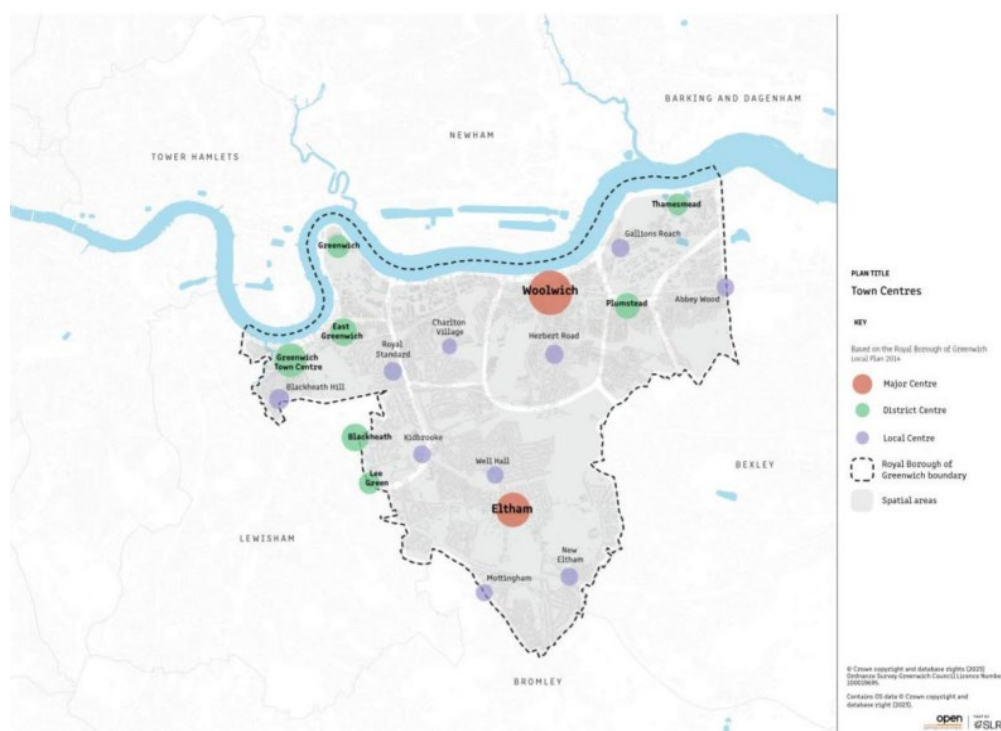


Figure 8: Map of RB Greenwich's Retail Centres

Additionally, there are 34 neighbourhood parades in the Royal Borough, which serve a more localised catchment, and are often accessible via walking or cycling.

In the final quarter of 2023/24, vacancy rates for retail units in Royal Greenwich's main town centres were as follows: 5.4% in Eltham, 13.8% in Woolwich, and 11.5% in Greenwich. These figures compare favourably to the UK average retail vacancy rate of 14.1% for the same period. However, the relatively high vacancy rate in Woolwich highlights the ongoing need for revitalisation, particularly in this key location.

Town centre footfall is another important indicator of vitality. In Eltham, trips through the town centre increased by approximately 61% between 2022 and 2024. Woolwich experienced a similar trend, with footfall rising by 56% over the same period. These increases are likely attributable to post-pandemic recovery, as 2022 figures were suppressed by Covid-19 restrictions. This increase is likely to be due to recovery from the Covid-19 pandemic, with artificially low figures in 2022, rather than an increase in vitality, given the increasing use of online retail by consumers, and the rising cost of living in the UK.

Retail transaction data provides further insight into economic activity. In Eltham, retail spend increased by over 50% (1.5 times the 2018 baseline) by late 2024 for both weekdays and weekends, despite a significant drop during the initial Covid-19 lockdown in March 2020. Transaction volumes followed a similar pattern, falling sharply in early 2020 but subsequently rising to around three times the baseline level by late 2024.

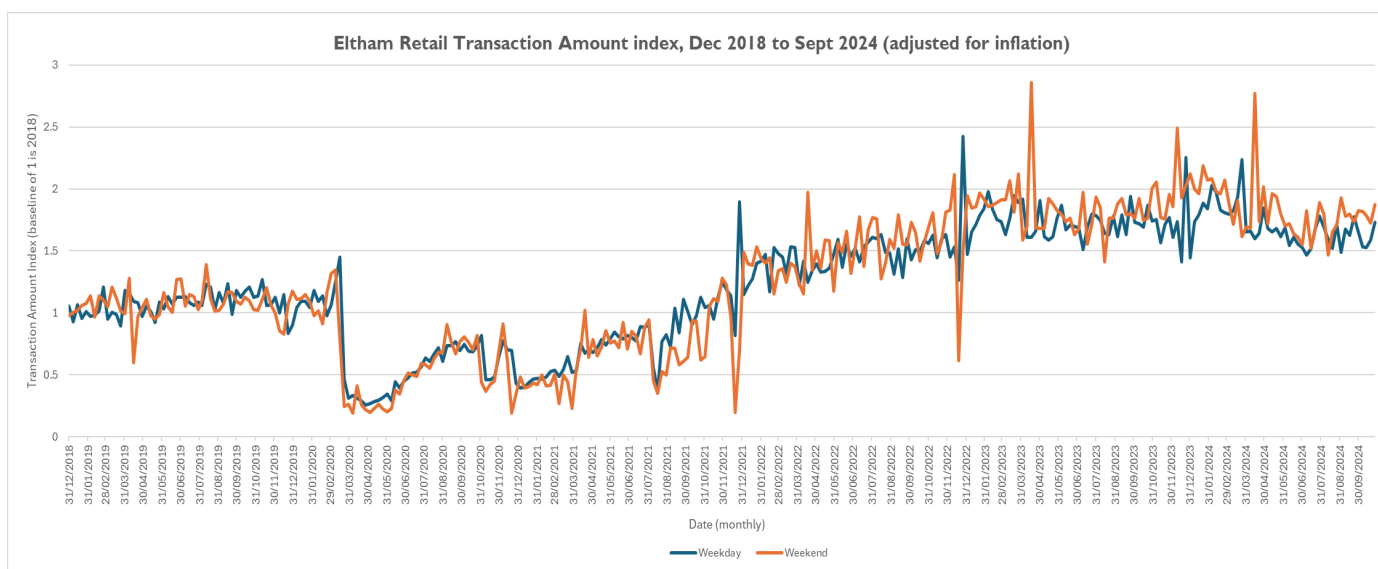


Figure 9: Eltham Retail Transaction Amount Index

The divergence between transaction counts (peaking at six times the baseline) and transaction values (peaking at nearly three times the baseline) suggests that while the number of transactions has increased substantially, the average value per transaction has remained relatively stable. This indicates that most transactions in Eltham are of low value, requiring a higher volume of sales to achieve equivalent growth in overall spend.

Woolwich town centre has exhibited a comparable pattern, with both transaction counts and spend dropping in early 2020 before recovering to exceed 2018 baseline levels. In Woolwich, the growth in transaction values (peaking at just over 2.5 times the baseline) is more closely aligned with the increase in transaction counts (peaking at around 3.5 times the baseline) than in Eltham. This suggests that retail transactions in Woolwich are generally of higher value, as a smaller increase in transaction numbers has resulted in a similar rise in total spend.

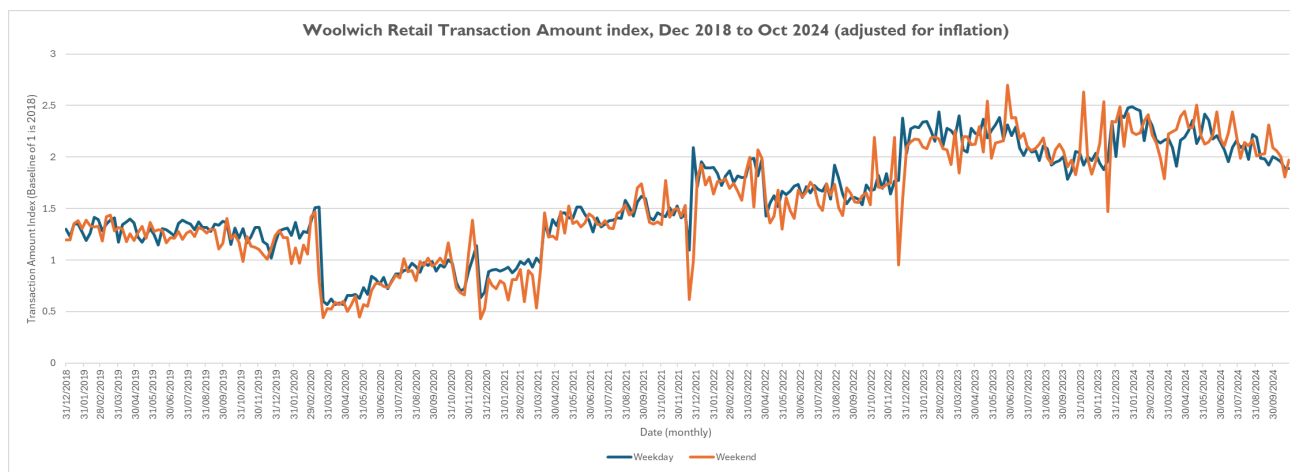


Figure 10: Woolwich Retail Transaction Amount Index

While these trends indicate a degree of economic recovery and increasing activity in Royal Greenwich's major town centres, persistent social challenges remain. High levels of deprivation, as measured by crime, living environment, and other indicators in the Index of Multiple Deprivation (IMD), continue to affect some town centres and will require targeted intervention.¹⁷

Art and Culture

The Arts, Culture and Recreation sector within Royal Greenwich contributed £106m in Gross Value Added (GVA) to the UK economy.¹⁸ This represents approximately 2% of the £5,250 GVA produced by all industries in Greenwich.¹⁹ Whilst the sector's economic output dropped significantly from £137m to 106m over the course of the COVID-19 pandemic in 2020 and 2021, it then rose to £150m in 2022,²⁰ indicating a strengthening past its pre-COVID condition.

¹⁷ The Royal Borough of Greenwich. Inclusive Economy Strategy (2024). Available at:

https://www.royalgreenwich.gov.uk/downloads/file/6697/inclusive_economy_strategy

¹⁸ Office for National Statistics (ONS). Dataset: Regional gross value added (balanced) by industry: local authorities by ITL1 region. (2024). Available at:

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/regionalgrossvalueaddedbalancedbyindustrylocalauthoritiesbyitl1region>

¹⁹ Office for National Statistics (ONS). Dataset: Regional gross value added (balanced) by industry: local authorities by ITL1 region. (2024). Available at:

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/regionalgrossvalueaddedbalancedbyindustrylocalauthoritiesbyitl1region>

²⁰ Office for National Statistics (ONS). Dataset: Regional gross value added (balanced) by industry: local authorities by ITL1 region. (2024). Available at:

This growth is likely due to the development of arts and cultural facilities within Woolwich and Greenwich Peninsula. In Woolwich, the Woolwich Works, Tramshed and Punchdrunk venues have all been developed and opened in recent years.²¹ Similarly, the O2, in the Greenwich Peninsula, has become one of the leading sports and entertainment venues in the world, providing 4,500 jobs, and contributing £300m in GVA to the Royal Greenwich economy.²²

Tourism

Greenwich has a well-developed tourism sector due to the presence of the Maritime Greenwich UNESCO World Heritage site, which comprises several museums and the surrounding landscape of Greenwich Park, in addition to Greenwich town centre. Visitor spend increased by 25% from 2022 to 2023, and visitor numbers also increased by 11% within this period, reaching 19 million visitors in 2023.²³ The Tourism and Security Services sectors in Royal Greenwich together contributed £129m in GVA to the UK economy in 2022, an uplift of 150% from before the COVID-19 pandemic in 2019 (GVA £86m).²⁴

Night time Economy

The number of people passing through Woolwich between 6pm and 6am, defined by the GLA as the hours of the night time economy,²⁵ increased from 2022 to 2023, but slightly decreased to 2024. Generally, footfall in Woolwich was greater during daytime hours than night time hours in 2022 and 2023, however in 2024, night time footfall slightly exceeded day time footfall.²⁶ This might reflect that in 2022, Woolwich was designated as a Night time Enterprise Zone by the London Mayor, increasing the amount of investment put into night time activities in the town centre.²⁷

In Eltham, day time trips through the centre significantly exceeded night time trips in 2022, 2023 and 2024.²⁸ However, as this difference was less significant in 2024 than 2022-23,

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/regionalgrossvalueaddedbalancedbyindustrylocalauthoritiesbyitl1region>

²¹ The Royal Borough of Greenwich. Inclusive Economy Strategy (2024). Available at:

https://www.royalgreenwich.gov.uk/downloads/file/6697/inclusive_economy_strategy

²² The Royal Borough of Greenwich. Inclusive Economy Strategy (2024). Available at:

https://www.royalgreenwich.gov.uk/downloads/file/6697/inclusive_economy_strategy

²³ The Royal Borough of Greenwich. Inclusive Economy Strategy (2024). Available at:

https://www.royalgreenwich.gov.uk/downloads/file/6697/inclusive_economy_strategy

²⁴ Office for National Statistics (ONS). Dataset: Regional gross value added (balanced) by industry: local authorities by ITL1 region. (2024). Available at:

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/regionalgrossvalueaddedbalancedbyindustrylocalauthoritiesbyitl1region>

²⁵ Mayor of London. Night Time Strategy Guidance. (2024). Available at: [Night Time Strategy Guidance | London City Hall](#)

²⁶ Internal RBG data, Department of Regeneration, Enterprise and Skills.

²⁷ London Assembly. Mayor's Night Time Enterprise Zones reinvigorate London's high streets. (2024). Available at:

<https://www.london.gov.uk/media-centre/mayors-press-release/mayors-night-time-enterprise-zones-reinvigorate-londons-high-streets#:~:text=The%20Mayor%20and%20Night%20Czar,cost%2Dof%2Dliving%20crisis>

²⁸ Internal RBG data, Department of Regeneration, Enterprise and Skills.

and the number of night time trips has increased over the time period, this suggests that the night time economy may have slightly grown in the centre over this time.²⁹

Likely future economic conditions

Over the plan period to 2037, the Royal Borough of Greenwich is expected to experience continued population growth, which will place increasing pressure on the local economy to deliver sufficient employment opportunities. While the number of jobs in the borough has grown steadily—from 73,000 in 2002 to 106,000 in 2022—jobs density remains significantly below the London average, indicating that many residents continue to commute outside the borough for work. Without targeted intervention, this trend is likely to persist, particularly given the borough’s relatively high proportion of part-time employment and lower workplace earnings compared to the London average.

The borough’s business base is dominated by micro-enterprises, which are more vulnerable to economic shocks and have lower survival rates. This suggests that future economic resilience will depend on supporting small businesses through tailored policy measures, infrastructure investment, and access to flexible workspaces. The growth of co-working and hybrid working models may also influence future demand for commercial floorspace, particularly in town centres and mixed-use developments.

Opportunity Areas are expected to accommodate significant employment growth. However, realising this potential will require coordinated investment in transport infrastructure and skills development. The borough’s office market has expanded in recent years, but further growth will depend on ensuring that new workspace meets the evolving needs of businesses, including high-quality design and digital connectivity.

The vitality of town centres is likely to be at risk of decline due to the continued rise of online shopping and cost-of-living challenges. While footfall and transaction volumes have rebounded post-pandemic, vacancy rates suggest that some centres may require targeted intervention to remain competitive. The night-time economy, is expected to grow, supported by initiatives such as the Night-Time Enterprise Zone designation.

The borough’s cultural and tourism sectors are likely to continue contributing significantly to economic output, particularly through assets such as the O2 Arena and Maritime Greenwich World Heritage Site. However, sustained investment in cultural infrastructure and marketing will be needed to maintain growth and diversify the visitor economy.

Overall, Greenwich’s economic future will depend on its ability to attract high-value employment, support inclusive growth, and ensure that development is aligned with infrastructure capacity and community needs. Without strategic intervention, existing disparities in employment, income, and business resilience may widen, particularly in areas with lower public transport accessibility and higher deprivation.

²⁹ Internal RBG data, Department of Regeneration, Enterprise and Skills.

2.2 Social Conditions

Population

Between the 2011 and 2021 Censuses, the population of Royal Greenwich grew by 13.6%, rising from approximately 254,600 to 289,200 residents. This rate of growth outpaced both London (7.7%) and England as a whole (6.6%) over the same period. As of 2021, Royal Greenwich ranked as the 17th least densely populated of London's 33 local authorities and 50th in total population out of 309 local authorities in England, moving up eight places since 2011.³⁰

The median age of residents increased from 33 to 35 years between 2011 and 2021. Notably, the number of people aged 50–64 rose by about 12,400 (a 35% increase), while the number of children under four declined by just over 1,900 (a 9.2% decrease).³¹

In 2021, 60.8% of Royal Greenwich residents (around 175,700 people) reported being born in England. The next most common country of birth was Nigeria, with just under 14,400 residents (5.0%). The borough's ethnic composition has also shifted: 55.7% identified as "White" (down from 62.5% in 2011), 21% as "Black, Black British, Black Welsh, Caribbean, or African" (up from 19.1%), and 13.2% as "Asian, Asian British or Asian Welsh" (up from 11.7%). Additionally, 4.2% identified within the "Other" ethnic group category. English was the main language for 81.78% of residents aged three and over, with Nepalese (2.11%) and Romanian (1.67%) being the next most common first languages.³²

Religious affiliation has also changed. In 2021, 32.6% of residents reported having "no religion," up from 25.5% in 2011. The proportion identifying as Christian fell from 52.9% to 44.7%, while those identifying as Muslim increased from 6.8% to 8.5%. It should be noted that the religion question in the Census is voluntary, so these figures should be interpreted with caution.

In terms of sexual orientation and gender identity, the 2021 Census found that 86.95% of residents identified as straight or heterosexual, 2.47% as gay or lesbian, 1.47% as bisexual, 0.37% as pansexual, 0.05% as asexual, and 0.10% as queer. Regarding gender identity, 91.96% described their gender as the same as their sex registered at birth, with 0.16% identifying as trans women, 0.18% as trans men, 0.08% as non-binary, and 0.43% identifying with a different gender identity not specifically listed.

Disability rates have declined: in 2021, 8.4% of residents reported being disabled and limited a lot in their daily activities (down from 10.7% in 2011), and 9.3% reported being disabled and limited a little (down from 10.4%). However, the 2021 Census was conducted during the pandemic, which may have influenced self-reported activity levels.

Household composition has also shifted. The proportion of households with a couple and no children increased from 13.3% in 2011 to 15.7% in 2021, while the proportion with a couple and dependent children remained stable at 18.0%. By contrast, the proportion of

³⁰ Census 2021, [Greenwich population change, Census 2021 – ONS](#)

³¹ Census 2021, [How life has changed in Greenwich: Census 2021 \(ons.gov.uk\)](#)

³² Census 2021, [Main language \(detailed\) - Office for National Statistics \(ons.gov.uk\)](#)

couple households without children across England fell from 17.6% to 16.8% over the same period.

Socio-Economic Indicators

According to the 2019 Indices of Multiple Deprivation (IMD), Royal Greenwich ranks as the 60th most deprived out of 317 local authorities in England, based on factors such as income, employment, education, health, and crime. Figure 11 illustrates the distribution of deprivation across the borough, highlighting that some of the most deprived areas include Greenwich Peninsula, Charlton Riverside, and Middle Park and Horn Park. In contrast, the least deprived areas are located in the south-east, such as Eltham and Avery Hill, and in the west, including Greenwich Park and Blackheath.³³

Deprivation Deciles, Greenwich, 2019

Index of Multiple Deprivation

Decile ● 1 ● 2 ● 3 ● 4 ● 5 ● 6 ● 7 ● 8 ● 9

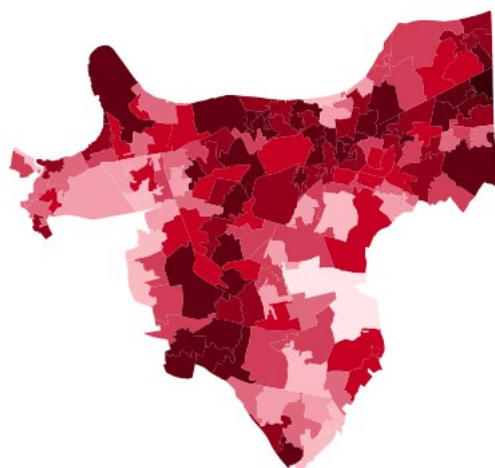


Figure 11: Deprivation deciles for areas in Greenwich (2019 data)³⁴

In 2022, the resident annual gross pay in Royal Greenwich was £38,000, slightly below the London average of £40,000 but well above the England average. Workplace annual gross pay (for those working within the borough) was £34,000, which is more significantly below the London average (£39,000) and only £2,000 above the England average.³⁵ This suggests that many residents commute out of the borough for higher-paying jobs.

Between January and March 2024, 4,663 individuals used the Greenwich Trussell Trust Foodbank. As of November 2023, 26,660 households were receiving Universal Credit. In August 2024, 5,810 men (6.0% of the working-age male population) and 5,535 women (5.4%) claimed out-of-work benefits, resulting in an overall claimant rate of 5.7% for residents aged 16–64. This is slightly below the London average (5.9%) but above the national average (4.3%). In 2023, approximately 16,000 jobs in Greenwich (22%) paid

³³ Indices of Multiple Deprivation, ONS, [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

³⁴ Greenwich Inclusive Economy dashboard, [Microsoft Power BI](#)

³⁵ Greenwich Inclusive Economy dashboard, [Microsoft Power BI](#)

below the living wage.³⁶ Additionally, 10.0% of households in Greenwich were classified as fuel poor, compared to 13.1% in England.³⁷

Child poverty remains a significant issue: in 2023, 8,579 children (14.6%) lived in absolute low-income families, and 11,193 children (19.0%) lived in relative low-income families. Both rates are higher than the London averages (12.3% absolute, 15.8% relative).³⁸

In 2023, the gender pay gap for full-time workers living in Greenwich was 17.1%, with women earning less than men—significantly higher than the London average gap of 10%. There is also a notable unemployment gap by ethnicity: in Q1 2024, the unemployment rate among white residents was 3.8%, compared to 8.8% for residents from minority ethnic groups. This gap is slightly wider than the London averages (5% for white residents, 9% for ethnic minorities).³⁹

In 2023/24, Greenwich Local Labour and Business (GLLaB) supported 955 people into work, a decrease from 1,131 in 2022/23. The employment rate for people aged 16 and over (excluding full-time students) increased by 4.1 percentage points between the 2011 and 2021 censuses, from 55.9% to 60.0%, the third-largest increase among all local authorities in England.

As of 2022, there were 88,000 jobs in the borough, with 62% being full-time and the remainder part-time. This is lower than the London average, where 74.2% of jobs are full-time.⁴⁰ Among employed residents aged 16 and over, 73.5% work full-time and 26.5% part-time, indicating that many full-time workers commute outside

Health

The Department of Health and Social Care reports that approximately two-thirds (64%) of adults in England are above a healthy weight, with 26.2% classified as obese. Among children leaving primary school, 36.6% are overweight or obese, and 22.7% are obese. In Royal Greenwich, 57.2% of adults are overweight (including obesity), and 23.2% are obese—both figures are below the national averages. However, among children leaving primary school in Greenwich, 41.2% are above a healthy weight and 27.2% are obese or severely obese, which exceeds the national averages.⁴¹

In 2024, an estimated 7,300 people in Greenwich were classified as long-term sick, representing 27% of the economically inactive population.⁴² Council data for 2020/21 indicates that 66.4% of adults in Royal Greenwich are physically active, compared to 64.9%

³⁶ ONS, [Number and proportion of employee jobs with hourly pay below the living wage - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/peopleandpopulation/workingpopulation/articles/numberandproportionofemployeejobswithhourlypaybelowthelivingwage/2022)

³⁷ Department for Energy Security and Net Zero fuel poverty data, [Sub-regional fuel poverty data 2024 \(2022 data\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2024)

³⁸ Department for Work and Pensions, [Children in low income families: local area statistics 2014 to 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-2014-to-2023)

³⁹ ONS nomis statistics, [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk/)

⁴⁰ Census 2021, data on hours worked, [Hours worked - Census Maps, ONS](https://www.ons.gov.uk/peopleandpopulation/workingpopulation/articles/hoursworked)

⁴¹ Department of Health and Social Care, Fingertips public health profiles, obesity profile, [Obesity Profile | Fingertips | Department of Health and Social Care \(phe.org.uk\)](https://www.phe.org.uk/publications/fingertips/obesity)

⁴² Department of Health and Social Care, Fingertips public health profiles, local health data, [Local Health - Small Area Public Health Data - Data - OHID \(phe.org.uk\)](https://www.phe.org.uk/publications/fingertips/local-health-data)

across London. This suggests that adults in Royal Greenwich are marginally more active than the London average.

Life expectancy at birth in Greenwich (2021–2023) was 78.88 years for men and 82.54 years for women. As shown in Figure 12, Royal Greenwich has one of the lowest life expectancies for both men and women in London. Furthermore, healthy life expectancy for men in Greenwich is three years lower than the England average and 3.7 years lower than the London average. In contrast, women’s life expectancy in Greenwich is 3.3 years higher than the England average and 2.2 years higher than the London average.⁴³

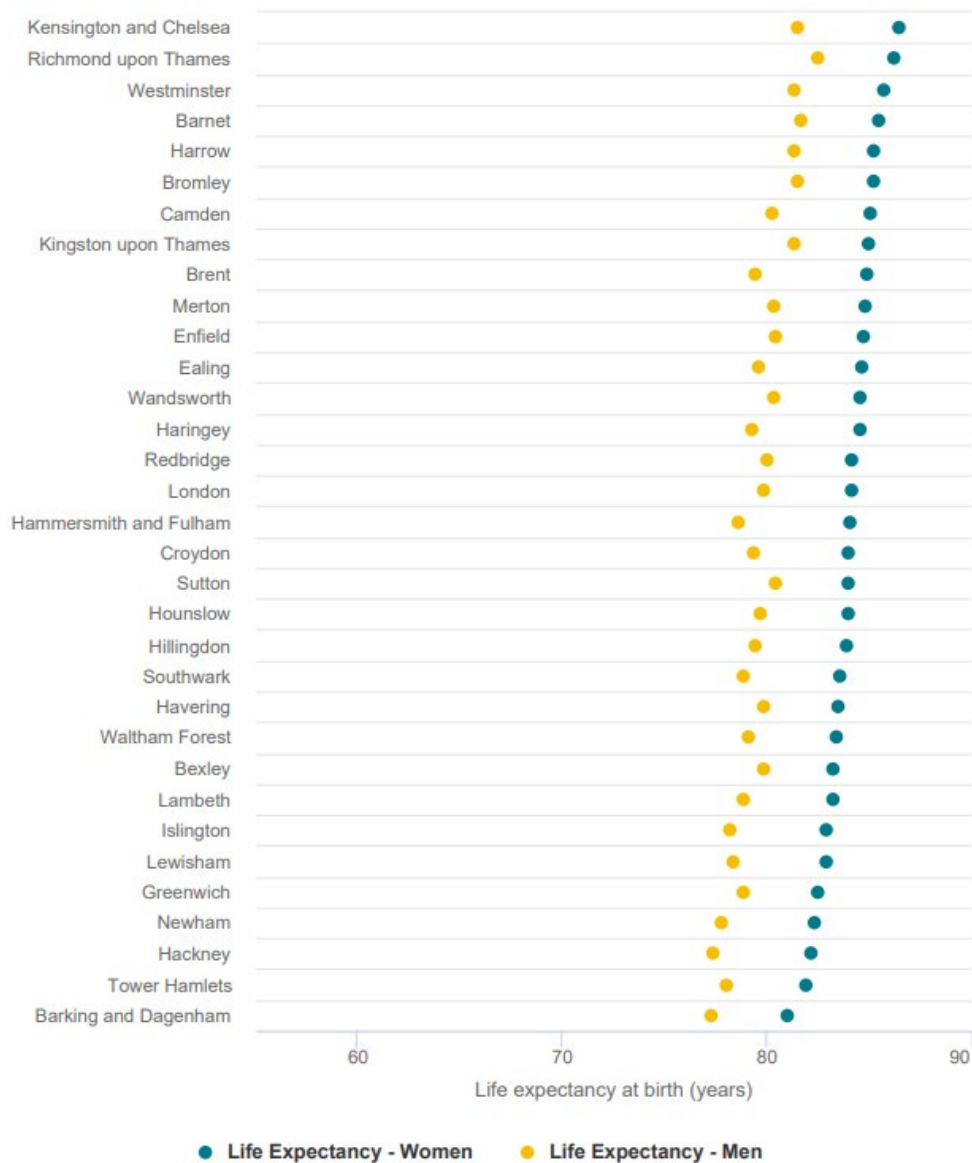
In 2022/23, 10.7% of patients aged 18 and over in Greenwich were recorded as having depression, compared to 13.2% in England. In 2021, 58% of secondary school pupils in Greenwich reported being happy with their life overall, while 47% indicated that worry at least ‘sometimes’ prevents them from concentrating or enjoying other activities.

A resident survey conducted in March–April 2023 found that 85% of respondents considered Royal Greenwich to be “welcoming” to people of different ethnic backgrounds, communities, genders, and sexual orientations, while 5% explicitly stated that they believed the borough was “not welcoming.”

⁴³ ONS via [Life expectancy by London borough | Trust for London](#)

Life expectancy at birth by borough for men and women (2021-2023)

Data source: Life expectancy, all ages, UK - ONS



London's Poverty Profile 2025

Figure 12: Life expectancy at birth by Borough for men and women (2021-2023)

Education

Greenwich residents are among the most highly qualified in England and Wales, placing the borough in the top 15% of local authorities. 45.7% of residents hold a Level 4 qualification or higher; such as a Higher National Certificate, Higher National Diploma, Bachelor's degree, or postgraduate qualification.⁴⁴

As of June 2024, 94% of Greenwich's schools were rated Good or Outstanding – slightly behind the 96% of schools in London, but ahead of the 89% in England. In Royal Greenwich, the percentage of young people gaining grade 4 and above in both English and

⁴⁴ Census 2021, [Education, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Maths GCSE's for 2022/23 was 66.3%. This compares to London which achieved 71.2% and England at 65.4%. Therefore, although Royal Greenwich has a slightly higher attainment level than England as a whole, it is significantly lower than London.⁴⁵

Crime

Police.uk state that in 2023, the crime rate in Royal Greenwich was 102.71 per 1,000 residents, which is around the average for London boroughs⁴⁶. The 2023 crime rate for specific crimes was 34 crimes per 1000 people classified as "Homicide, Violence with Injury, Violence without Injury" (above the average for London of 28.1), 3.1 crimes classified as "Rape, Other sexual offences" (again above the London average of 2.7), 3 crimes classified as "Robbery of Personal Property, Robbery of Business Property", 22.6 classified as "Theft from Person, Shoplifting, Bicycle Theft, Other Theft" (well below the London average of 31.4) and 7.7 crimes classified as "Arson, Criminal Damage"⁴⁷.

In a survey conducted in Spring 2024, 64% of residents in Royal Greenwich stated that they felt "safe" when outside in their local area after dark; 15% answered that they felt "neither safe nor unsafe", while 20% reported that they felt "unsafe". This compares to 88% of residents who stated that they felt "safe" when outside in their local area during the day, with 6% feeling "neither safe not unsafe" and 6% feeling "unsafe".⁴⁸

The rates for crime are similar to the London average as a whole, although higher for violent crimes such as homicide, and crimes classified as rape or other sexual offences. Around 1 in 5 residents feel unsafe in the borough after dark, significantly more than the number of residents who don't feel safe during the day.

Housing

As of September 2024, Royal Greenwich contained 124,505 dwellings, comprising 87,956 privately owned and 36,549 publicly owned properties. According to the 2021 Census, 20% of residents lived in one-bedroom homes, 33.5% in two-bedroom homes, 33% in three-bedroom homes, and 13% in homes with four or more bedrooms.

In June 2024, the average property price in Royal Greenwich was £436,052. Prices varied by property type, with detached houses averaging £921,015, semi-detached houses £660,607, terraced houses £500,102, and flats or maisonettes £364,112. The overall average property price in Royal Greenwich remains below the London average of £523,134. However, property prices in the borough have increased significantly over the past decade, rising from £305,405 in June 2014.⁴⁹

⁴⁵ Ofsted data, Internal Royal Greenwich source

⁴⁶ Crime in Greenwich compared with crime in similar areas, [Compare your area | Police.uk \(www.police.uk\)](https://www.police.uk)

⁴⁷ Internal Royal Greenwich data: Greenwich annual plan indicators 23/24, [Annual Plan Indicators MASTER.xlsx \(sharepoint.com\)](#) – internal link

⁴⁸ Our Greenwich Annual plan 2023/24 and annual plan indicators.

⁴⁹ UK House Price Index, [UK House Price Index \(data.gov.uk\)](https://data.gov.uk).

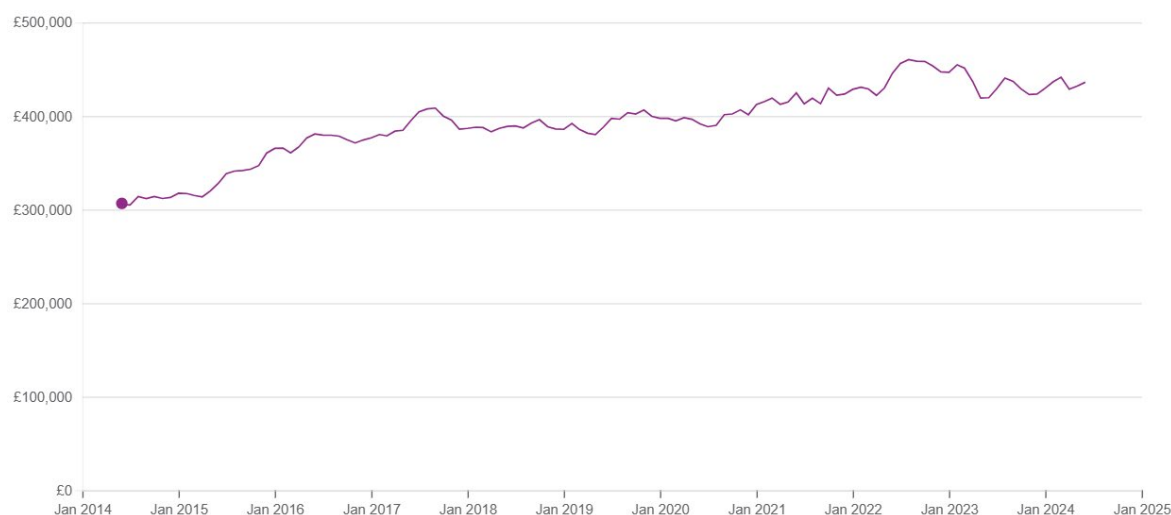


Figure 13: Trends in housing prices in RB Greenwich since 2014

The average monthly private rent in Greenwich was £1,818 in August 2024. Both Greenwich and London have experienced steady rent increases over the past ten years, with particularly sharp rises in the last two years. Despite this, rents in Greenwich remain below the London average.⁵⁰

Between the 2011 and 2021 censuses, the proportion of households in social rented accommodation in Royal Greenwich fell by 3.3 percentage points, from 34.3% to 31.0%. This remains significantly higher than the London average, which declined from 24.1% to 23.1% over the same period. The proportion of private renters in Royal Greenwich increased from 19.8% in 2011 to 25.5% in 2021, though this is still below the London average of 30% in 2021 (up from 25.1% in 2011). The share of households owning their home outright or with a mortgage or loan decreased from 43.3% in 2011 to 41.1% in 2021, which is also below the London average of 45.2% in 2021 (down from 48.3% in 2011). Shared ownership increased to 2.2% in 2021 from 1.6% in 2011, slightly above the London average of 1.5% in 2021.⁵¹

Tenure varies significantly by age group. Among residents aged 16–64, only 9% own their home outright, 32% own with a mortgage or shared ownership, 30% are private renters or living rent-free, and 30% are social renters. For those aged 65 and over, 50% own outright, 7% own with a mortgage or shared ownership, 6% are private renters or living rent-free, and 37% are social renters.

As of the 2021 Census, 0.3% of dwellings in Royal Greenwich were second homes with no usual residents⁵². Across England and Wales, 5.3% of the population (3.2 million people) reported staying at a second address for more than 30 days a year. In Royal Greenwich, 5.1% of usual residents reported using a second address either within or outside the UK.

In the 2021 Census, 5.6% of dwellings in Royal Greenwich were classified as “truly vacant.”

⁵⁰ ONS private rent and house price data September 2024, [Private rent and house prices, UK - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/housing/rentandhouseprices)

⁵¹ ONS Census 2021, tenure by age, [Tenure by age - Household Reference Persons - Office for National Statistics](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/physicalhealth/bulletins/tenurebyage)

⁵² Office for National Statistics, [Number of vacant and second homes, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/numberofvacantandsecondhomes)

Housing demand remains high. As of April 2024, 5,020 people were on the housing waiting list in Bands A, B1, and B2 (priority need), a significant increase from 3,963 in 2021/22. The number of people on the Band C waiting list (not in priority need) also rose, from 20,393 in 2021/22 to 23,137 in 2024. Of those on the rehousing waiting list, 58% were seeking a one-bedroom home, 21% a two-bedroom, 14% a three-bedroom, 5% a four-bedroom, and 2% a home with five or more bedrooms.

Severe overcrowding is an ongoing issue. As of 30 April 2024, there were 622 cases of severe overcrowding in the borough, up from 430 cases in 2018, with numbers rising each year. In 2023/24, council tenants and leaseholders made 1,486 complaints, primarily related to plumbing, repairs, and damp.

As of September 2024, Royal Greenwich had 1,389 licensed Houses in Multiple Occupation (HMOs), with the highest concentrations in Plumstead, followed by Woolwich, Abbey Wood, and Charlton. During the first three quarters of 2022, 141 unlicensed properties were identified through investigations.

In September 2024, there were also 983 homes registered as student-only households and 792 homes with both student and non-student residents. Of the student-only homes, 145 were located in Flinders House on Greenwich Peninsula, with the remainder distributed across the borough, particularly in Abbey Wood and Plumstead.

Provision for residents with specific needs has improved. In 2023/24, 1,652 homes were specially adapted, up from 581 in 2021/22. Additionally, 2,617 vulnerable clients were supported to live independently in 2023/24, compared to 1,780 in 2021/22.

Likely future social conditions

The population of the Royal Borough of Greenwich is projected to continue growing over the plan period to 2037, building on the 13.6% increase recorded between the 2011 and 2021 Censuses. This growth is expected to place increasing pressure on housing, education, healthcare, and other social infrastructure. The borough's demographic profile is also shifting, with a notable rise in residents aged 50–64 and a decline in the number of young children. If current trends persist, demand for age-appropriate housing and health services will increase, particularly for older residents and those with long-term health conditions. Royal Greenwich's population is growing more rapidly than the London average, highlighting the need for additional housing.

Greenwich's ethnic and cultural diversity is likely to deepen, with continued migration contributing to a rich social fabric but also requiring inclusive service provision and community engagement. The borough's relatively high levels of deprivation in some wards suggest that inequalities may widen without targeted intervention. Child poverty, fuel poverty, and unemployment gaps by ethnicity and gender are likely to remain key challenges unless addressed through coordinated policy action.

Housing affordability is expected to remain a significant issue. Rising property prices and rents, coupled with below-average workplace earnings, mean that many residents will continue to face barriers to securing suitable accommodation. The growing waiting list for

social housing and increasing levels of overcrowding indicate that demand for affordable and supported housing will intensify. Without substantial investment in new housing supply—particularly social and council housing—existing pressures are likely to worsen.

Health outcomes in Greenwich are mixed. While adult obesity rates are below the national average, childhood obesity remains high, and life expectancy for men is among the lowest in London. Mental health indicators, including depression rates and youth wellbeing, suggest that further support will be needed to address both physical and mental health inequalities. The borough's Health and Wellbeing Strategy (2023–2028) will play a critical role in shaping future interventions, but success will depend on sustained funding and cross-sector collaboration.

Overall, the social conditions in Greenwich are likely to become more complex over the plan period. Population growth, demographic change, and persistent inequalities will require integrated planning across housing, health, education, and community services. Without strategic action, disparities in access to services and quality of life may deepen, particularly in the most deprived areas of the borough.

2.3 Environmental Conditions

Heritage assets

The Royal Borough of Greenwich contains a substantial number of heritage assets that play a key role in shaping its distinctive character. These include 830 locally listed buildings and 541 nationally listed assets, some of which consist of groups of buildings⁵³. Of the nationally listed assets, 28 are classified as Grade I, 45 as Grade II*, and 468 as Grade II. The borough also encompasses 23 conservation areas, 18 of which have adopted Conservation Area Appraisals⁵⁴. Figure 14 shows the location of the 23 Conservation Areas within the Borough, 18 of which have conservation area appraisals.

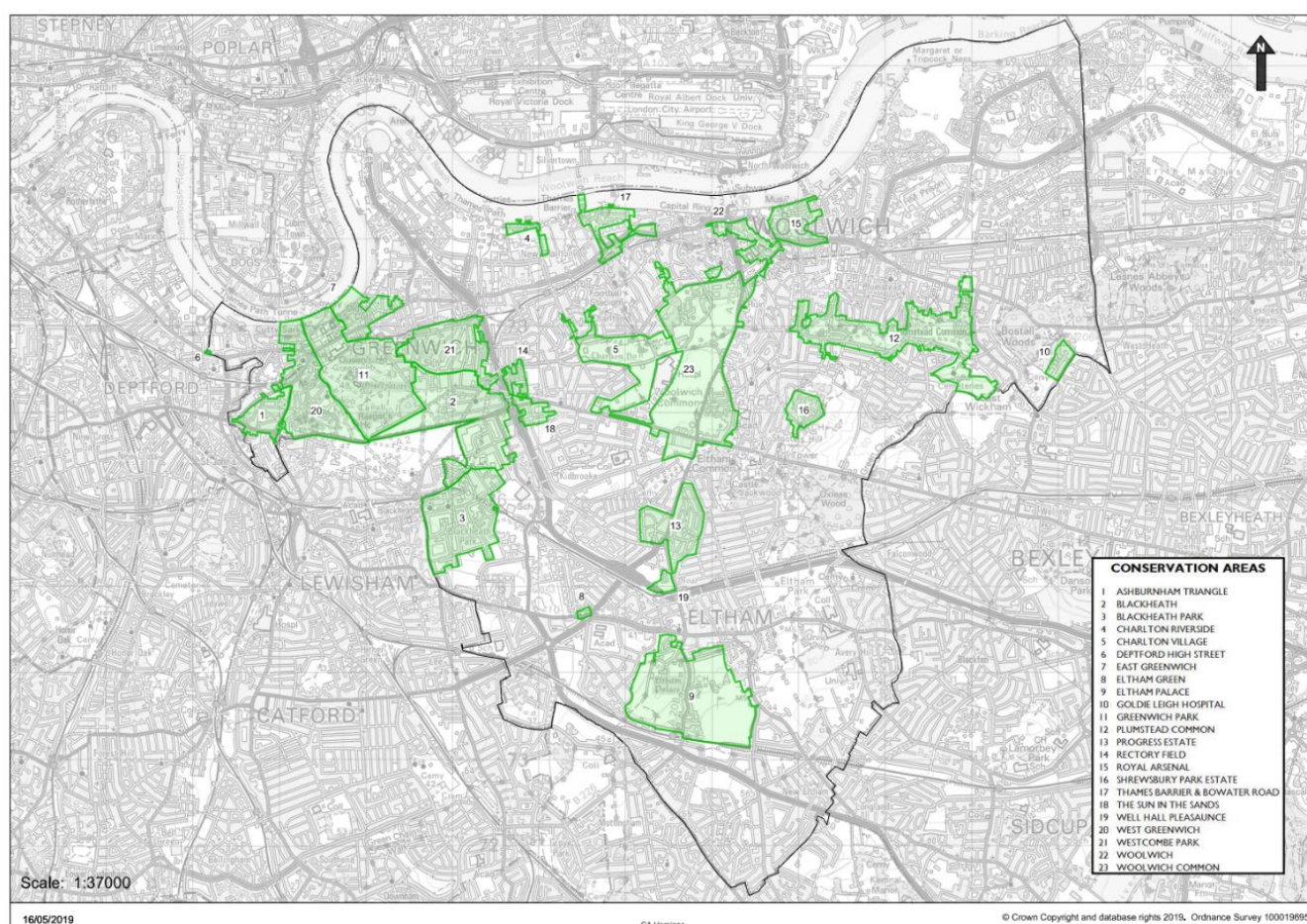


Figure 14: Location of Royal Greenwich's Conservation Areas⁵⁵

⁵³ Historic England, The List. 2024. Available at: <https://historicengland.org.uk/listing/the-list/advanced-search/?modify=true>

⁵⁴ Royal Borough of Greenwich, Conservation area appraisals and management strategies.

2024. Available at:

https://www.royalgreenwich.gov.uk/info/200194/conservation_areas_and_listed_buildings/1547/conservation_area_appraisals_and_management_strategies

⁵⁵ Royal Borough of Greenwich, Conservation areas in the borough map. 2024. Available at:

https://www.royalgreenwich.gov.uk/downloads/download/991/map_showing_all_23_conservation_areas_in_the_borough

The Royal Borough of Greenwich contains four registered parks and gardens, reflecting its rich landscape heritage⁵⁶. Most notably, it is home to the UNESCO World Heritage Site at Maritime Greenwich, which comprises a group of architecturally and historically significant buildings and spaces, including the Queen's House, the Royal Observatory, the Old Royal Naval College, and the surrounding landscape of Greenwich Park⁵⁷.

The Borough is also home to three designated London Squares, Ingleside Gardens, Gloucester Circus, and Batley Park, which are protected under the London Squares Preservation Act 1931. This legislation restricts the use of these squares to ornamental gardens, pleasure grounds, or areas for play, rest, or recreation, and prohibits the construction of buildings or structures on or over them, except where necessary for their authorised use or maintenance.

The Royal Borough of Greenwich contains 30 Areas of High Archaeological Potential (AHAP), which collectively cover approximately 34% of the borough's land area. In addition, there are 12 Scheduled Monuments that reflect the borough's nationally significant heritage.⁵⁸ The Heritage at Risk Register identifies 10 historic buildings within the borough as being at risk, along with one park and three conservation areas.

⁵⁶ Historic England, The List. 2024. Available at: <https://historicengland.org.uk/listing/the-list/advanced-search/?modify=true>

⁵⁷ UNESCO, Maritime Greenwich. 2024. Available at: <https://whc.unesco.org/en/list/795>

⁵⁸ Historic England, The List. 2024. Available at: <https://historicengland.org.uk/listing/the-list/advanced-search/?modify=true>

Protected views

Development within the Royal Borough of Greenwich must take account of designated protected views. These include two strategic views identified in the London View Management Framework (as set out in the London Plan 2021): View 5A from the General Wolfe statue in Greenwich Park to St Paul's Cathedral, and View 6A from Blackheath Point to St Paul's Cathedral and one townscape view: View 24 from Island Gardens.

Development in the foreground of these views must not obstruct or compromise them. In addition, the Greenwich Core Strategy (2014) designates 12 Local Views, which also require careful consideration in the planning process.⁵⁹ Further protected views are identified within Conservation Area Appraisals; however, these are not strategic designations. The Strategic and Local Views within the borough are illustrated on Figure 15.

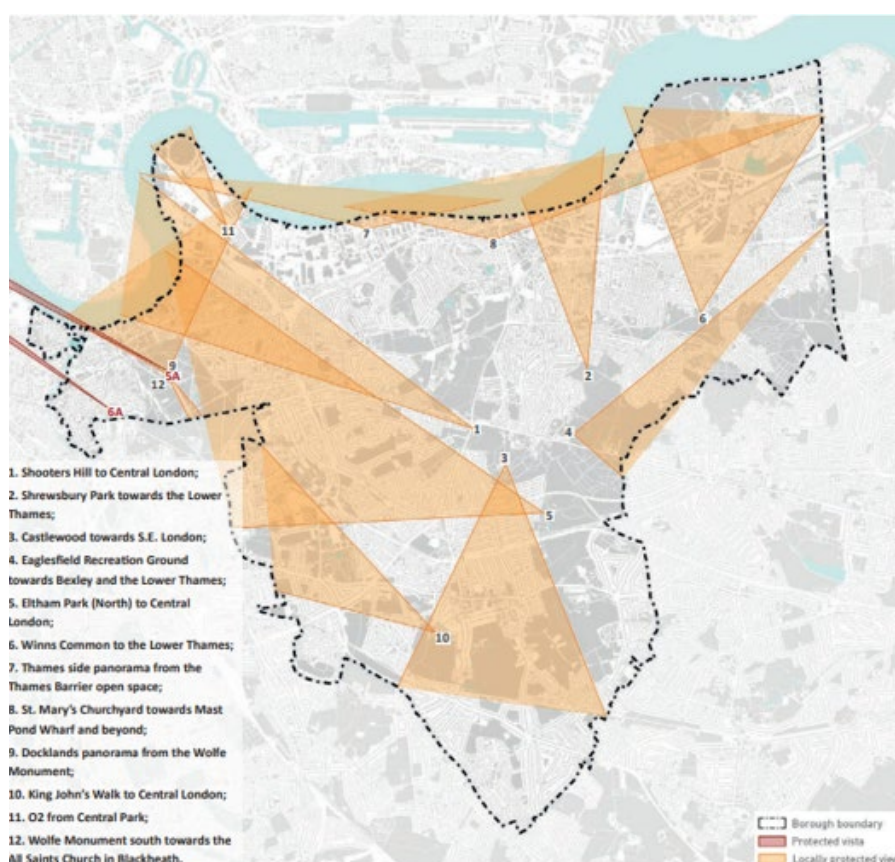


Figure 15: Strategic and Local Views within Greenwich

⁵⁹ Royal Borough of Greenwich, Characterisation and tall buildings study. 2023. Available at: https://www.royalgreenwich.gov.uk/downloads/download/1341/characterisation_and_tall_buildings_study

Green and Blue Infrastructure

Open space makes up 38.7% of the land area of Royal Borough of Greenwich, with 584 individual open spaces.⁶⁰ There is a two-tier level of protection Metropolitan Open Land and Community Open Spaces as shown on Figure 16.

The River Thames runs along the entirety of the northern boundary of the Royal Borough of Greenwich. There are also smaller water bodies and tributaries of the River Thames at Deptford Creek and the River Quaggy and a network of canals in Thamesmead.

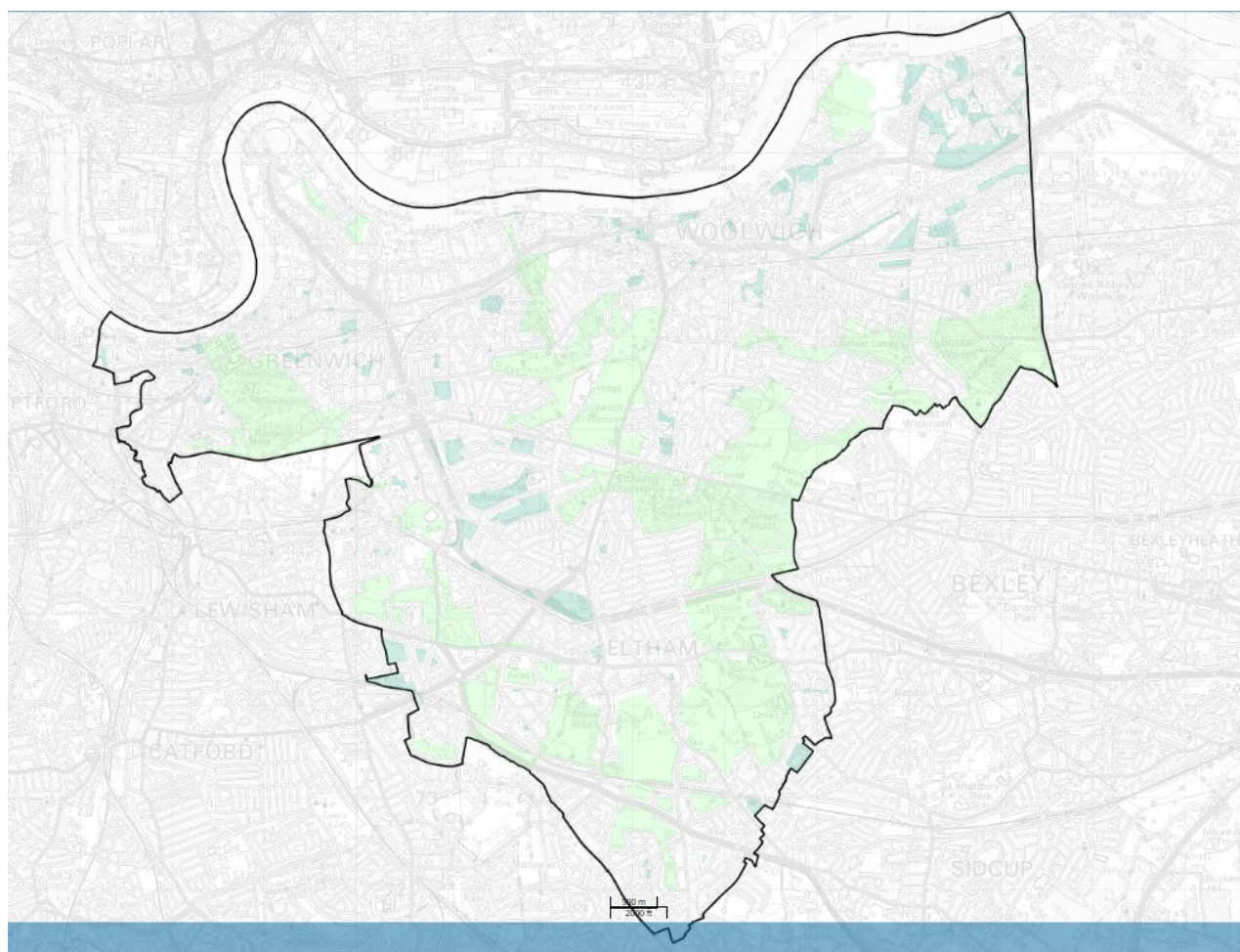


Figure 16: Metropolitan Open Land (light green) and Community Open Space (dark green)

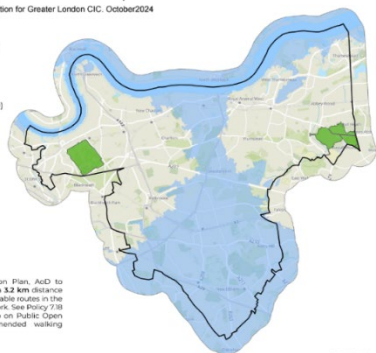
Despite this, residents in some parts of the Borough are considered to be deficient in access to different types of Public Open Space.

⁶⁰ GiGL, Greenwich borough factsheet. 2024. Available at: <https://www.gigl.org.uk/our-data-holdings/planning-for-nature/boroughstats/>

Areas of Deficiency in Access to Metropolitan Parks

Produced by Greenspace Information for Greater London CIC, October 2024

- LB Greenwich boundary
+500m radius
- Metropolitan Parks
(60 - 400 hectares)
- Areas of Deficiency (AoD)



As recommended by the London Plan, AoD to district parks is calculated using a 3.2 km distance from site access points along walkable routes in the Ordnance Survey Highways network. See Policy 7.18 of the London Plan for more info on Public Open Space categories and recommended walking distances.

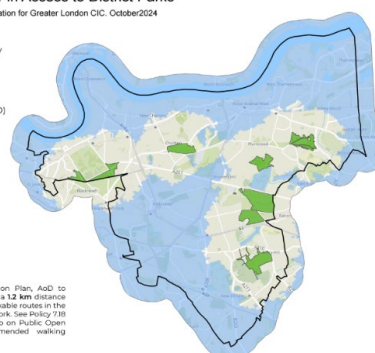


Contains Ordnance Survey data © Crown Copyright and database right 2024. Royal Greenwich Licence Number 100019895

Areas of Deficiency in Access to District Parks

Produced by Greenspace Information for Greater London CIC, October 2024

- LB Greenwich boundary
+500m radius
- District Parks
(20 - 60 hectares)
- Areas of Deficiency (AoD)



As recommended by the London Plan, AoD to district parks is calculated using a 1.2 km distance from site access points along walkable routes in the Ordnance Survey Highways network. See Policy 7.18 of the London Plan for more info on Public Open Space categories and recommended walking distances.

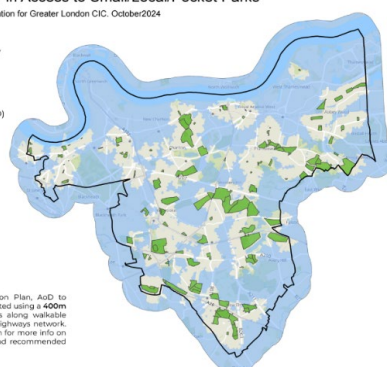


Contains Ordnance Survey data © Crown Copyright and database right 2024. Royal Greenwich Licence Number 100019895

Areas of Deficiency in Access to Small/Local/Pocket Parks

Produced by Greenspace Information for Greater London CIC, October 2024

- LB Greenwich boundary
+500m radius
- Small, Local or Pocket
Parks and open spaces
(up to 20 hectares)
- Areas of Deficiency (AoD)



As recommended by the London Plan, AoD to small/local/pocket parks is calculated using a 400m distance from site access points along walkable routes in the Ordnance Survey Highways network. See Policy 7.18 of the London Plan for more info on Public Open Space categories and recommended walking distances.



Contains Ordnance Survey data © Crown Copyright and database right 2024. Royal Greenwich Licence Number 100019895

Figure 17: Areas of Deficiency in access to open space

Biodiversity

There are 55 Sites of Importance for Nature Conservation (SINCs) within Royal Greenwich, making up for 22.3% of the land area, as shown on Figure 18.⁶¹ These are classified into three tiers:

- Sites of Metropolitan Importance
- Sites of Borough Importance (Grade I and II)
- Sites of Local Importance

⁶¹ GiGL, Greenwich borough factsheet. 2024. Available at: <https://www.gigl.org.uk/our-data-holdings/planning-for-nature/boroughstats/>

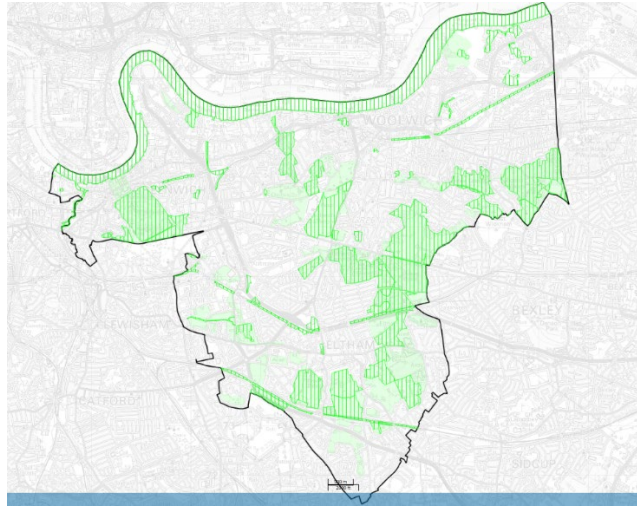


Figure 18: Sites of Importance for Nature Conservation

According to Greenspace information for Greater London (GiGL), 8.9% of wildlife species recorded in Royal Greenwich are designated under at least one type of regional, national or London-wide protection designation.⁶²

There are many biodiversity hotspots distributed throughout the Royal Borough of Greenwich; the largest appear to be at Greenwich Park / Blackheath and Royal Blackheath Golf Club / Tarn Bird Sanctuary.

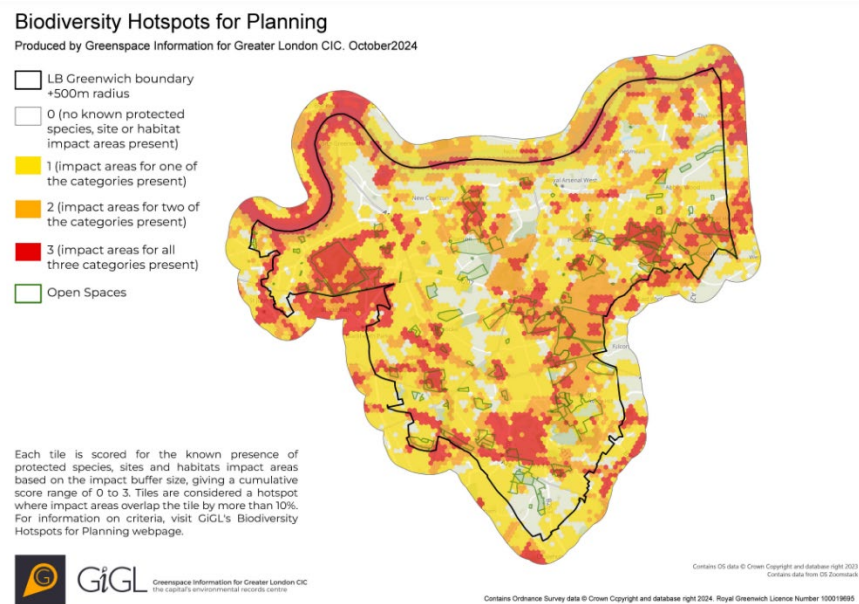


Figure 19: Biodiversity Hotspots

⁶² GiGL, Greenwich borough factsheet. 2024. Available at: <https://www.gigl.org.uk/our-data-holdings/planning-for-nature/boroughstats/>

Air quality

The Royal Borough of Greenwich produced 691 kilotonnes of Greenhouse Gas (GHG) Emissions in 2020, and 734 kilotonnes of these emissions in 2021, making it the 16th largest emitter of GHG emissions out of all the London Boroughs. However, regarding per capita emissions, which are more reflective of the influence of population size and growth, these display that the Royal Borough of Greenwich produces lower per capita emissions of carbon dioxide on average per year (2.7 tonnes CO₂) than the London average (3.1 tonnes CO₂), and significantly lower CO₂ emissions than the national average (4.8 tonnes CO₂).

The sectors responsible for the highest Greenhouse Gas emissions in the Borough are the domestic and transport sectors, which produce 72% of overall emissions, followed by the commercial sector which is responsible for 11.3% of GHG emissions.⁶³ This pattern is similar to that for average emissions in England and in London, although Greenwich has a slightly lower proportion of emissions from waste management and industry, than the London and England averages.⁶⁴

In 2022, air quality in the Royal Borough of Greenwich was notably poorer than the London average. Approximately 80% of the borough's Lower Super Output Areas (LSOAs) fell within decile 10, the highest category for concentrations of nitrogen dioxide (NO₂), particulate matter (PM₁₀), and sulphur dioxide (SO₂). In comparison, 63% of LSOAs across Greater London were in decile 10.⁶⁵ This disparity is likely due to Greenwich's location within inner London, where urban density and associated greenhouse gas emissions are typically higher, whereas the London-wide average is influenced by outer boroughs with lower levels of urbanisation and emissions. Within Greenwich, air quality tends to be poorer in the northern parts of the borough compared to the southern areas.

The entire Borough of Greenwich has been declared an Air Quality Management Area (AQMA) since 2001 for Nitrogen dioxide and PM10. Figure 20 shows eight Air Quality Focus Areas (AQFAs) in Greenwich; these are areas which have continued high levels of pollution and are prioritised for targeted action to improve air quality and reduce health risks.

⁶³ Microsoft Power BI, RBG inclusive economy data dashboard. No date. Available at: [Microsoft Power BI](#) (data from ONS, 2022)

⁶⁴ Microsoft Power BI, RBG inclusive economy data dashboard. No date. Available at: [Microsoft Power BI](#) (data from ONS, 2022)

⁶⁵ Microsoft Power BI, RBG inclusive economy data dashboard. No date. Available at: [Microsoft Power BI](#) (data from ONS, 2022)

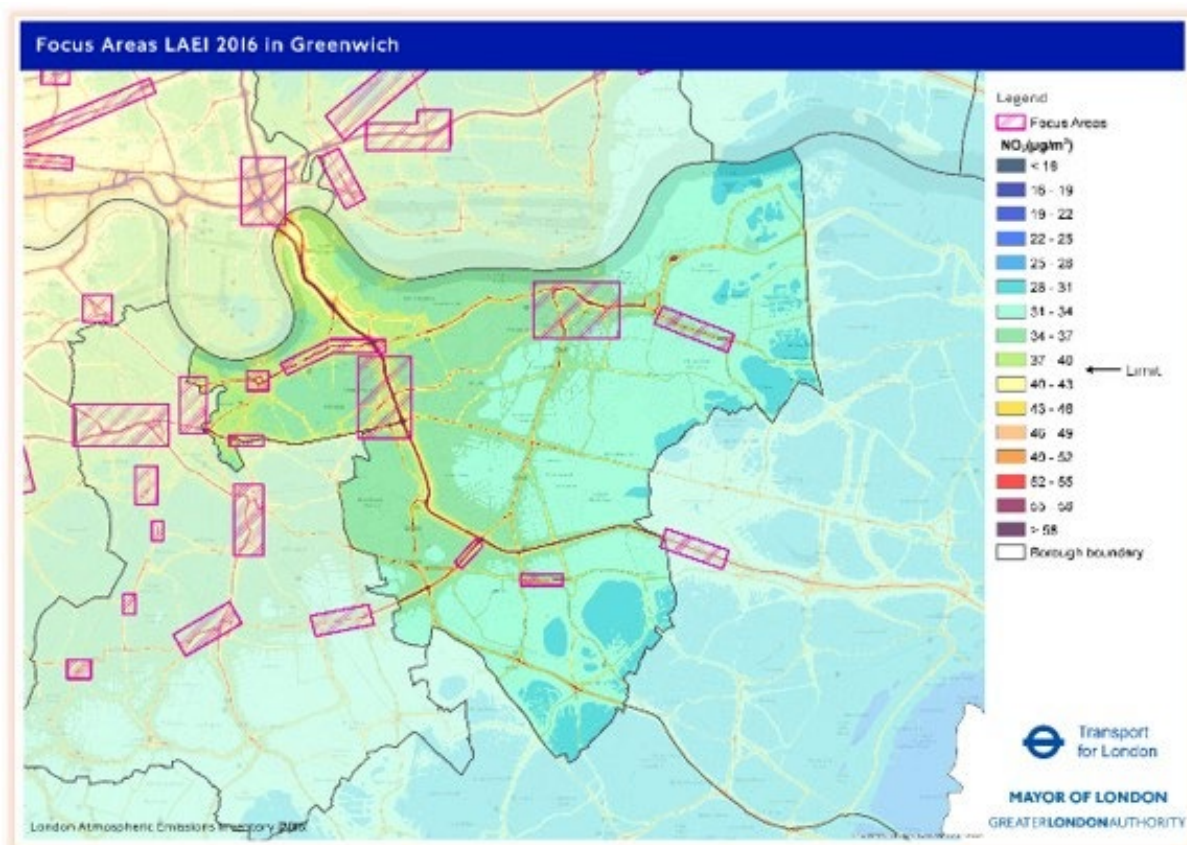


Figure 20: Air Quality Focus Areas in Royal Greenwich

Climate change and adaptation

The London Climate Risk mapping ranks the level of risk of geographical areas to the effects of climate change and flood risk, taking into consideration multiple factors including age profile, income deprivation, PM2.5 and NO2 concentration, access to green space, tree canopy cover and surface water flooding. The Climate Risk map for Greenwich is shown in Figure 21.

Risk of climate change impacts in the form of flooding and extreme heat are concentrated in the North of the Royal Borough, around Woolwich and Plumstead.⁶⁶ This is likely due to the close proximity of these areas to the river Thames, where flood risk is greatest, and due to their urban character, increasing the influence of the Urban Heat Island effect.

⁶⁶ London Climate Risk Mapping, GLA. No date. Available at: <https://cityhall.maps.arcgis.com/apps/instant/media/index.html?appid=59236d2e842c4a3ba6480d9dac585d1e>

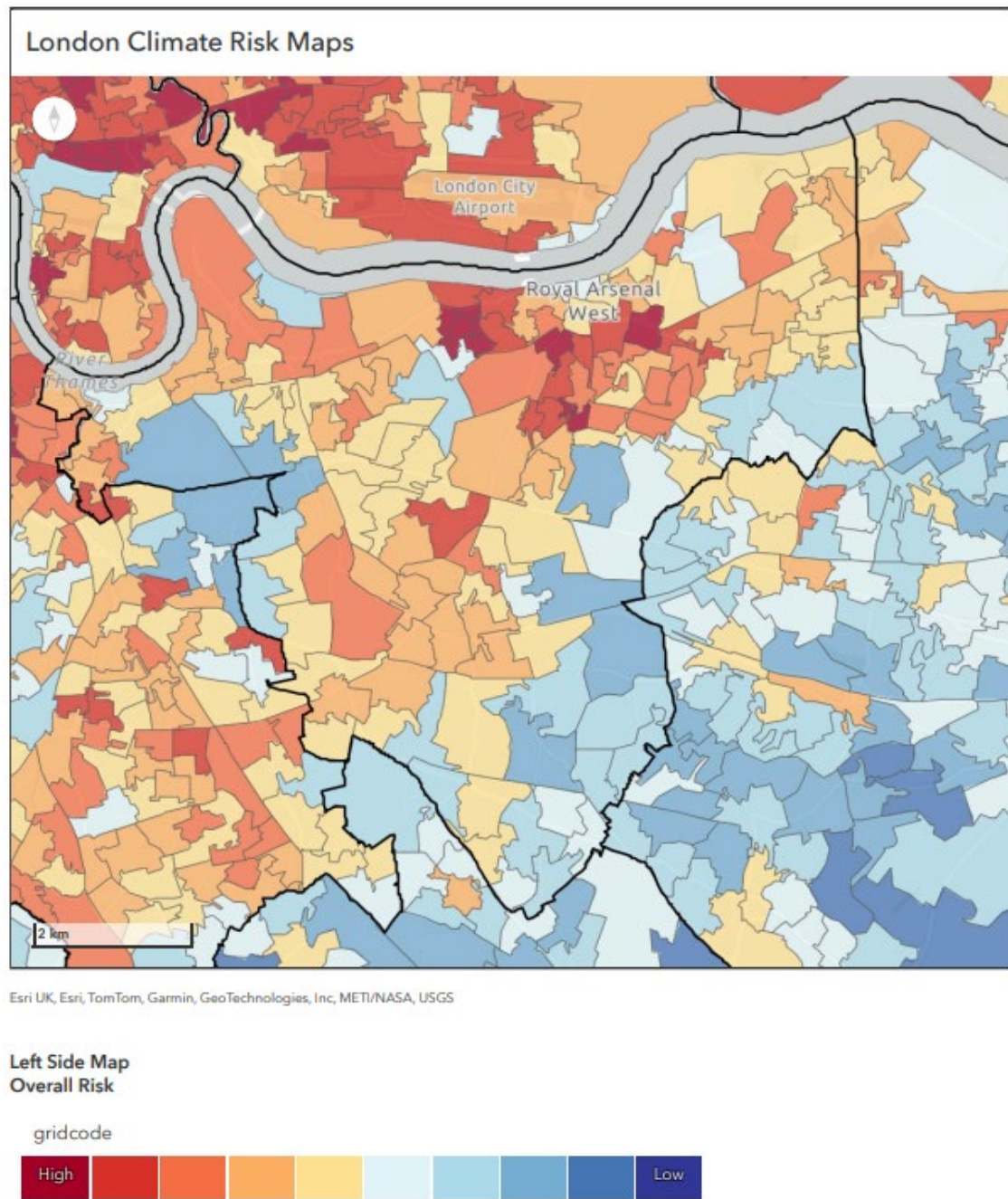


Figure 21: Climate Risk map for Greenwich

The Environmental Audit Committee (EAC) 2024 report on 'Heat resilience and sustainable cooling' states that extremely high temperatures can lead to dehydration, heat exhaustion and heatstroke which can cause serious illness, and potentially death.⁶⁷ UK heat related deaths exceeded 4,500 in 2022, and this could rise to 10,000 annually if significant action is

⁶⁷ Environmental Audit Committee, 2024. Available at:
<https://publications.parliament.uk/pa/cm5804/cmselect/cmenvaud/279/summary.html>

not taken.⁶⁸ High temperatures also increase incidences of work-related injuries, and impact those who are over 65 and/or have existing health conditions most severely.⁶⁹

Extremely elevated temperatures can also have mental health consequences, with hot weather exacerbating the symptoms of psychiatric illness, worsening side effects from medication and considerably worsening suicide risk.⁷⁰ Similarly, research has found that those affected by flooding can experience higher rates of anxiety, depression, and post-traumatic stress disorder (PTSD) for up to two years following the event.⁷¹

Additionally, climate change is likely to damage the national and regional economy, with predictions that its effects will impact London's GDP by 2-3% every year by the 2050s, with those costs further increasing in the second half of the century.⁷²

The Royal Borough of Greenwich currently has an installed solar energy capacity of 2.97 megawatts,⁷³ contributing to its local renewable energy generation. In addition, the borough has developed the Riverside Heat Network, with grant funding secured to produce a detailed strategy for potential expansion. This strategy will explore opportunities to extend the network westward to connect with existing areas of high heat demand.⁷⁴ Progress has also been made in the electrification of the Borough's own transport with 5.5% of the public transport fleet now electric. The Council is actively collaborating with infrastructure providers to increase the availability of public electric vehicle charging points across the Borough.

In terms of energy efficiency, dwellings in Greenwich which were sold, let, or completed in Q1 2020 had slightly higher EPC ratings than the London average for these dwelling types, with almost 25% of the dwellings having an EPC rating of B, compared to just over 15% of dwellings having EPC B rating in London on average⁷⁵. Similarly, there were a slightly higher proportion of EPC A rated dwellings in Greenwich compared to London on average, and slightly lower proportions of the other ratings than the London average.⁷⁶ This reflects that new properties, and properties new to the market are more energy efficient in Greenwich than in London on the whole.

⁶⁸ Environmental Audit Committee, 2024. Available at:

<https://publications.parliament.uk/pa/cm5804/cmselect/cmenvaud/279/summary.html>

⁶⁹ Environmental Audit Committee, 2024. Available at:

<https://publications.parliament.uk/pa/cm5804/cmselect/cmenvaud/279/summary.html>

⁷⁰ Environmental Audit Committee, 2024. Available at:

<https://publications.parliament.uk/pa/cm5804/cmselect/cmenvaud/279/summary.html>

⁷¹ Environment Agency, 2021. Available at: <https://www.gov.uk/government/publications/mental-health-costs-of-flooding-and-erosion/mental-health-costs-of-flooding-and-erosion>

⁷² The London Climate Resilience Review, 2024. Available at: https://www.london.gov.uk/sites/default/files/2024-07/The_London_Climate_Resilience_Review_July_2024_FA.pdf

⁷³ Buro Happold, LAEP borough profile, Greenwich.

⁷⁴ Royal Borough of Greenwich, 2nd year emissions report, 2021. Available at:

<https://committees.royalgreenwich.gov.uk/documents/s2210/Appendix%203%202nd%20Year%20Emissions%20Report.pdf>

⁷⁵ Data analysed, based on data from MHCLG, 2020. Available at: <https://data.london.gov.uk/dataset/domestic-energy-efficiency-ratings-borough>

⁷⁶ Data analysed, based on data from MHCLG, 2020. Available at: <https://data.london.gov.uk/dataset/domestic-energy-efficiency-ratings-borough>

There is disparity between the energy performance levels of privately sold or rented homes and social housing, which has lower energy performance ratings on average, with less than 1% of the council-owned stock having an EPC rating of A or B. Around 50% of the stock has an EPC rating of C, and approximately 46% of the stock is rated EPC D.

Water and Flooding

High population density in London means that the city region has higher water consumption rates than the national average for England and Wales, despite being one of the driest parts of the country.⁷⁷ As a result, London and the Southeast have been classified as areas facing serious water stress.⁷⁸ The Royal Borough of Greenwich is located within the Thames Water Region, in the London Water Resource Zone (WRZ).⁷⁹ This zone currently has a deficit of 24 million litres a day, which is predicted to increase to 362 million litres a day by 2045.⁸⁰

Much of the water supply in London comes from surface waters from the River Thames and River Lee which are being held within reservoirs. The Royal Borough of Greenwich contains four reservoirs: Castlewood Reservoir, Oxleas Wood Reservoir, East Wickham reservoir and Eltham reservoir.⁸¹ However, due to the borough's topography and resulting water pressure levels, the majority of water supply in Royal Greenwich is sourced from other areas of London, for example Honor Oak Pumping Station and Nunhead Upper Reservoir.⁸² As a last resort, due to the high energy requirements and cost of the process, the Royal Borough can also utilise a desalination plant in Beckton which removes the salt and treats water from the Thames Estuary so it can be used domestically.⁸³

In order to solve the pressing water deficit forecast in the London Water Resource Zone, a new major water resource will need to be found or engineered. To achieve this, the Thames Water Resource Management Plan outlines that Thames Water will be exploring three options: development of a new reservoir, wastewater recycling in London, and long-distance water transfers.⁸⁴

⁷⁷ Royal Borough of Greenwich: Infrastructure Delivery Plan (IDP), 2021 (revised 2023). Available at: https://www.royalgreenwich.gov.uk/downloads/file/3200/infrastructure_delivery_plan_for_royal_greenwich

⁷⁸ Royal Borough of Greenwich: Infrastructure Delivery Plan (IDP), 2021 (revised 2023). Available at: https://www.royalgreenwich.gov.uk/downloads/file/3200/infrastructure_delivery_plan_for_royal_greenwich

⁷⁹ Thames Water: Water resources management plan 2020-2100, 2020. Available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>

⁸⁰ Thames Water: Water resources management plan 2020-2100, 2020. Available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>

⁸¹ Royal Borough of Greenwich: Infrastructure Delivery Plan (IDP), 2021 (revised 2023). Available at: https://www.royalgreenwich.gov.uk/downloads/file/3200/infrastructure_delivery_plan_for_royal_greenwich

⁸² Mayor of London, DD1502 Charlton to Crayford Integrated Water Management Strategy, 2016. Available at: <https://www.london.gov.uk/decisions/dd1502-charlton-crayford-integrated-water-management-strategy>

⁸³ Royal Borough of Greenwich: Infrastructure Delivery Plan (IDP), 2021 (revised 2023). Available at: https://www.royalgreenwich.gov.uk/downloads/file/3200/infrastructure_delivery_plan_for_royal_greenwich

⁸⁴ Thames Water: Water resources management plan 2020-2100, 2020. Available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>

Whilst the majority of the Royal Borough of Greenwich is located within Flood Zone 1, indicating the lowest level of risk, significant parts of the north of the Royal Borough are located in Flood Zone 3 with a high probability of flooding. This means that in any year, these areas have a 1% or higher risk of flooding. Some areas, usually at the edge of the highest risk areas, are within Flood Zone 2, where the annual risk of flooding is between 1% and 0.1%.⁸⁵ See figure 22.

Future developments located within Flood risk zone 2 or 3 will require flood risk assessments to be submitted as part of their planning applications.⁸⁶ Developments should mitigate flood risk through their designs and through improvements to flood defences.

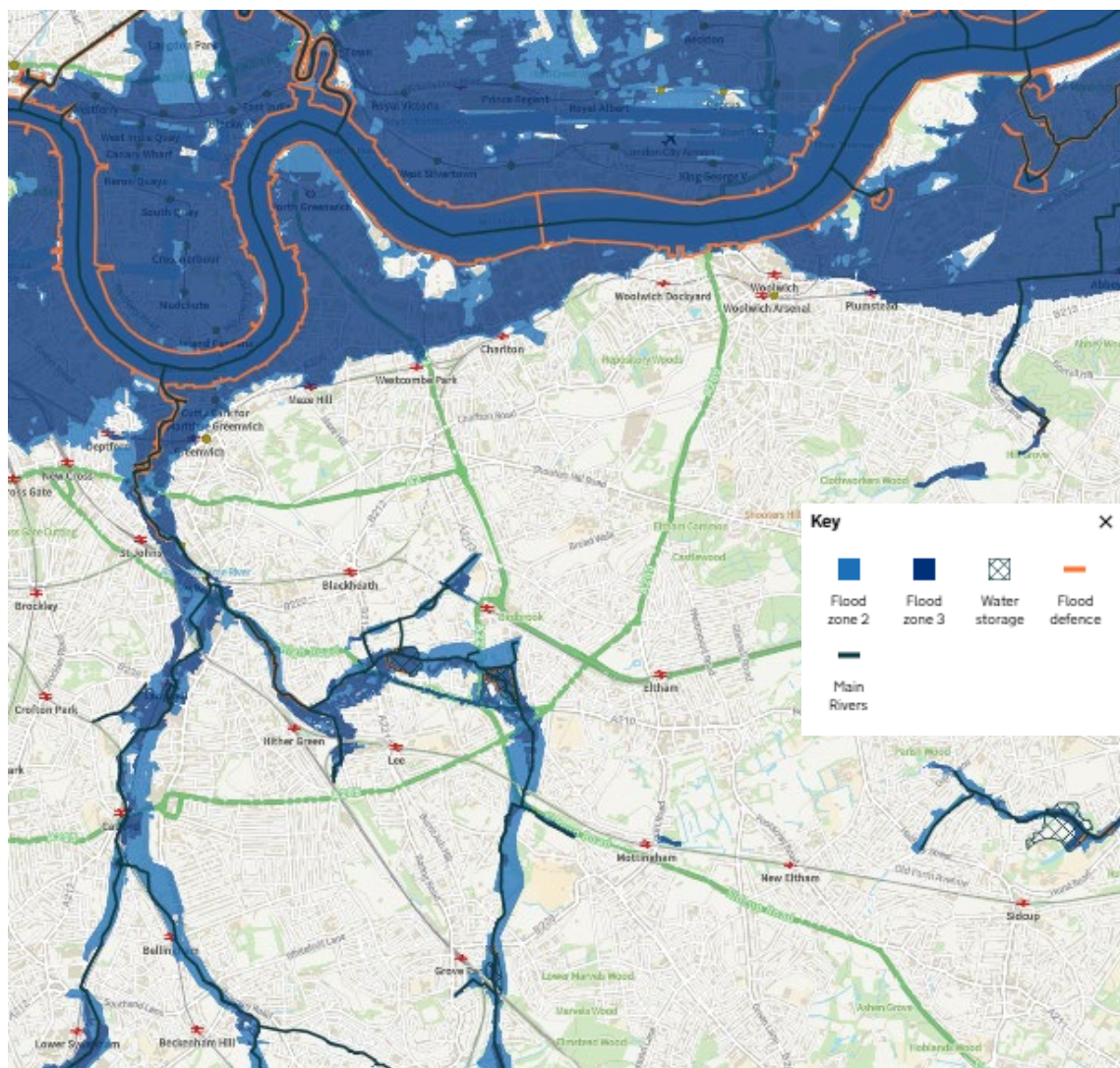


Figure 22: Flood Zones within RB Greenwich

Noise

⁸⁵ Gov.UK, Flood map for planning, flood zone results explained. No date. Available at: <https://flood-map-for-planning.service.gov.uk/flood-zone-results-explained?zone=FZ3a>

⁸⁶ Gov.UK, Flood map for planning, flood zone results explained. No date. Available at: <https://flood-map-for-planning.service.gov.uk/flood-zone-results-explained?zone=FZ3a>

Areas most affected by noise are adjacent to main roads and railways. Residential areas close to main roads in the Royal Borough of Greenwich face average (night and day) noise levels of 55.0-59.9 decibels (dB) at a minimum, with noise levels reaching 75 dB and over on the roads themselves.⁸⁷ Within the immediate vicinity of the railway lines, average (night and day) noise levels are 55.0-59.9 dB, with noise levels on the lines themselves averaging 70.0-74.9 dB.⁸⁸

The World Health Organisation (WHO) environmental European noise guidelines state that daytime traffic noise above 53 dB, or railway noise above 54 dB is associated with adverse health effects.⁸⁹ Moreover, at night, the WHO considers that road traffic noise exceeding 45 dB, and railway noise exceeding 44 dB is associated with adverse effects on sleep.⁹⁰

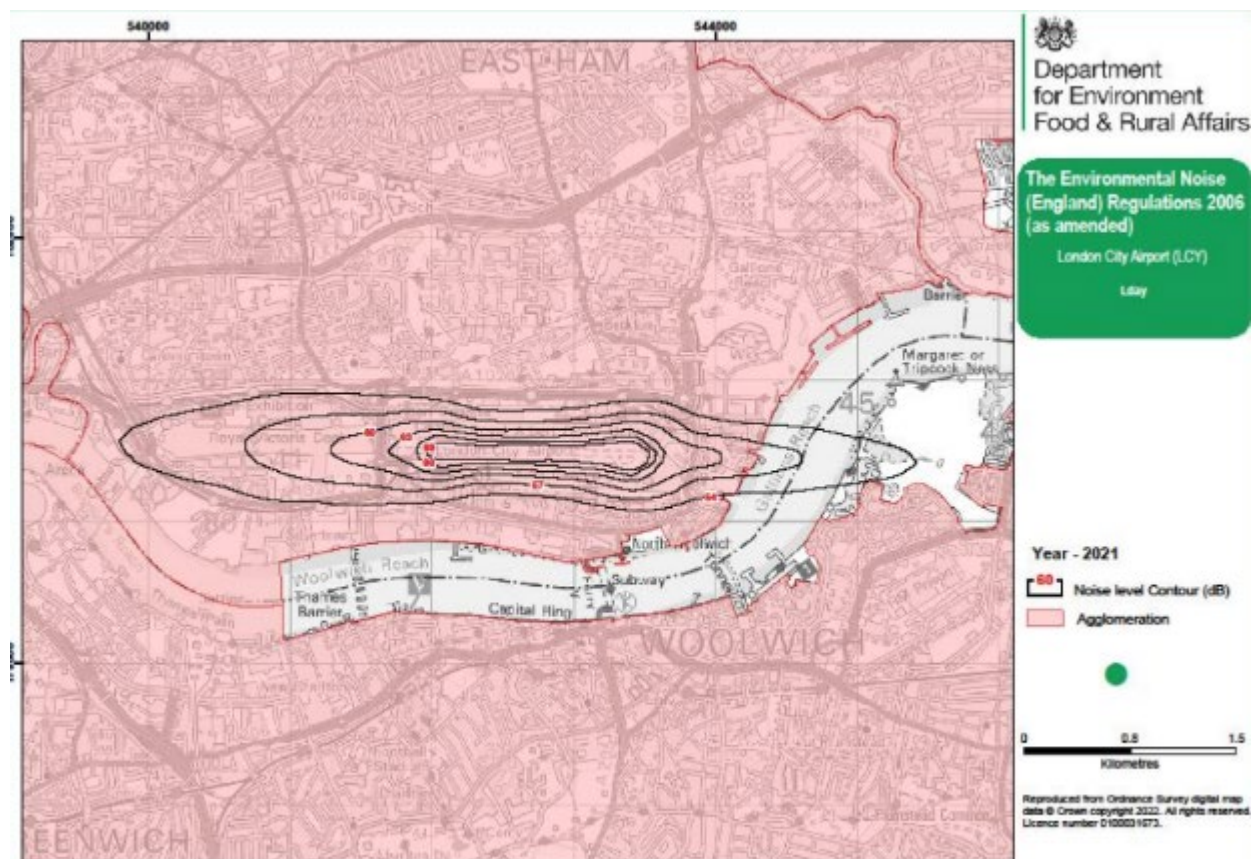


Figure 23: Noise level contours for London City Airport

Aviation noise is also a factor in parts of the Borough, most notably Thamesmead (see figure 23), due to the proximity to London City Airport. Within Thamesmead, the recorded

⁸⁷ Extrium, England noise and air quality viewer. 2024. Available at: <http://www.extrium.co.uk/noiseviewer.html>

⁸⁸ ⁸⁸ Extrium, England noise and air quality viewer. 2024. Available at: <http://www.extrium.co.uk/noiseviewer.html>

⁸⁹ World Health Organization, regional office for Europe. Environmental noise guidelines for the European region. 2019. Available at: <https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1>

⁹⁰ World Health Organization, regional office for Europe. Environmental noise guidelines for the European region. 2019. Available at: <https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1>

noise is 64 dB; ⁹¹ the WHO advises that aircraft noise exceeding 45 dB is associated with adverse health effects.⁹²

The number of recorded noise complaints has decreased in the period 2019 to 2024. over time in Greenwich from 2019 to 2024. In 2024, the highest number of noise complaints were recorded in Woolwich Arsenal ward (approximately 140 complaints), followed by Plumstead and Glyndon ward (around 120 complaints), and Blackheath Westcombe ward (114 complaints).

Waste

Household recycling rates indicate the proportion of collected household waste which is recycled or composted. The Royal Borough of Greenwich had a recycling rate of 29 in 2022/23, which is relatively low compared to the London average of 33, and England average of 42.⁹³ This recycling rate has been decreasing since 2012/2013. This trend is unfortunate and taken with the comparison against London and England averages, may reflect the high, and growing number of new, flatted developments in the Royal Borough.⁹⁴

In the Royal Borough of Greenwich, for kerbside houses, dry mixed recycling and mixed food and garden waste is collected weekly, and residual waste is collected fortnightly. For communal residential developments, all waste is collected weekly in order to encourage greater separation of recycling. Monthly collections of waste electrical goods and textiles are also carried out in some developments. However, in 2020 houses had an average recycling rate of 50%, and flats had an average recycling rate of 20%.⁹⁵ The lower rate in flatted developments is likely due to residents having less storage area for numerous bins and how easily recyclable waste can be contaminated in communal bins.

The Borough's Reuse and Recycling Centre is located in West Thamesmead, and includes a reuse shop ("Repurpose") managed by the Greenwich and Bexley Hospice.⁹⁶ The majority of Royal Greenwich's household and commercial waste is not processed within the borough: residual waste is processed at South East London Combined Heat and Power (SELCHP) plant in Lewisham to produce energy; mixed dry recycling is processed at

⁹¹ London City Airport, Draft noise action plan. 2023. Available at:

https://assets.ctfassets.net/p2begwdbu8jy/6HUW4nGMaYJ956tQFOQjv4/48159a7b687f8933072c318f9e4b892f/London_City_Airport_Noise_Action_Plan.pdf

⁹² World Health Organization, regional office for Europe. Environmental noise guidelines for the European region. 2019. Available at: <https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1>

⁹³ London Datastore, Household waste recycling rates, borough. 2024. Available at: <https://data.london.gov.uk/dataset/household-waste-recycling-rates-borough>

⁹⁴ Royal Borough of Greenwich, Waste Strategy 2016-2025. 2020. Available at: <https://committees.royalgreenwich.gov.uk/Data/Cabinet/202009161830/Agenda/11.6%20-%20Appendix%20F%20-%20TZW%20Strategy%20Update.pdf>

⁹⁵ Royal Borough of Greenwich, Waste Strategy 2016-2025. 2020. Available at: <https://committees.royalgreenwich.gov.uk/Data/Cabinet/202009161830/Agenda/11.6%20-%20Appendix%20F%20-%20TZW%20Strategy%20Update.pdf>

⁹⁶ Royal Borough of Greenwich, Waste Strategy 2016-2025. 2020. Available at: <https://committees.royalgreenwich.gov.uk/Data/Cabinet/202009161830/Agenda/11.6%20-%20Appendix%20F%20-%20TZW%20Strategy%20Update.pdf>

the Veolia Materials Recovery Facility (MRF) in Southwark and organic waste is processed in several locations in the South of England.⁹⁷

Transport

There are many public modes of transport available for residents or visitors to use in the Royal Borough of Greenwich.

- The Jubilee line serves the Greenwich Peninsula with North Greenwich station located near the O2 Arena.
- The DLR branch to Lewisham serves the northeast corner of the borough and provides connections to Canary Wharf and the City. The DLR branch at Woolwich Arsenal provides a connection to docklands north of the river.
- The Elizabeth line has stations at Woolwich and Abbey Wood, providing a fast connection to Canary Wharf, central London and Heathrow Airport.
- The borough has three national rail lines operated by Southeastern forming east-west routes between Central London and Kent. Thameslink trains also provide routes operating through Greenwich, Woolwich, Charlton and Deptford.
- A range of TfL bus routes also operate across the borough.
- Thames Clipper services link Greenwich, North Greenwich, Royal Wharf, Woolwich and Barking Riverside.
- River crossings include the Greenwich foot tunnel, Woolwich foot tunnel, Woolwich ferry and the London Cable Car between Royal Victoria Dock and Greenwich Peninsula.

Some areas of Royal Greenwich are better connected in terms of public transport than other areas, this is indicated through Public Transport Accessibility Level (PTAL) scores (see figure 24).

⁹⁷ Royal Borough of Greenwich, Waste Strategy 2016-2025. 2020. Available at: <https://committees.royalgreenwich.gov.uk/Data/Cabinet/202009161830/Agenda/11.6%20-%20Appendix%20F%20-%20TZW%20Strategy%20Update.pdf>

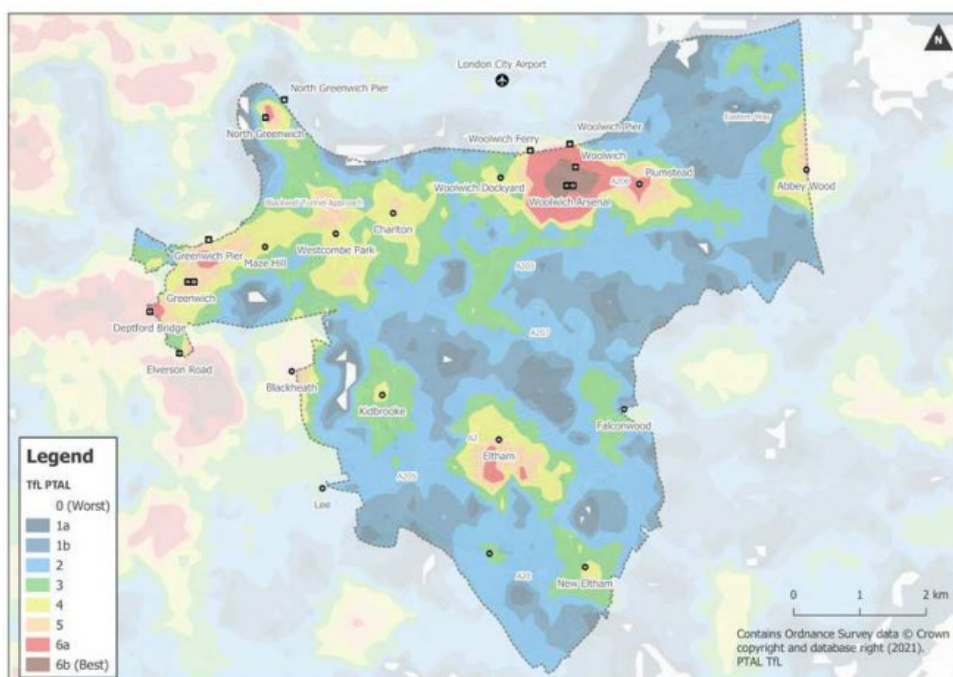


Figure 24: PTAL levels for Royal Greenwich

It is clear that the northern part of the borough (along the Woolwich to Deptford axis) is well connected by public transport. Woolwich Arsenal has the best public transport accessibility levels (PTAL) in the borough. The rest of the borough has relatively poor PTAL scores, with the exception of parts of Eltham in the south. Some of the most deprived parts for the borough, such as Thamesmead have lowest public transport accessibility. Residents in low PTAL areas may have difficulty accessing services and amenities.

The borough's car ownership levels are in line with average levels for London as a whole, but still above targets set in the Mayor of London's Transport Strategy (MTS). Considering average data for the 2016- 2019 period, 42% of households in Royal Greenwich owned one car while 14% owned two cars. 44% did not own a car.⁹⁸ This suggests that nearly half of all households live without a car, and so use public transport, walk or cycle to get around.

While transport habits of Royal Borough of Greenwich residents show that over a third of residents' trips are made by car / motorcycle, cycle mode share slightly exceeds the London borough average of 1.4% of trips.⁹⁹ The National Cycle network and the TfL cycle routes within Greenwich are illustrated in figures 25 and 26 respectively.

⁹⁸ Royal Borough of Greenwich, Transport Strategy. 2022. Available at: https://www.royalgreenwich.gov.uk/download/downloads/id/6154/transport_strategy.pdf

⁹⁹ Royal Borough of Greenwich, Transport Strategy. 2022. Available at: https://www.royalgreenwich.gov.uk/download/downloads/id/6154/transport_strategy.pdf

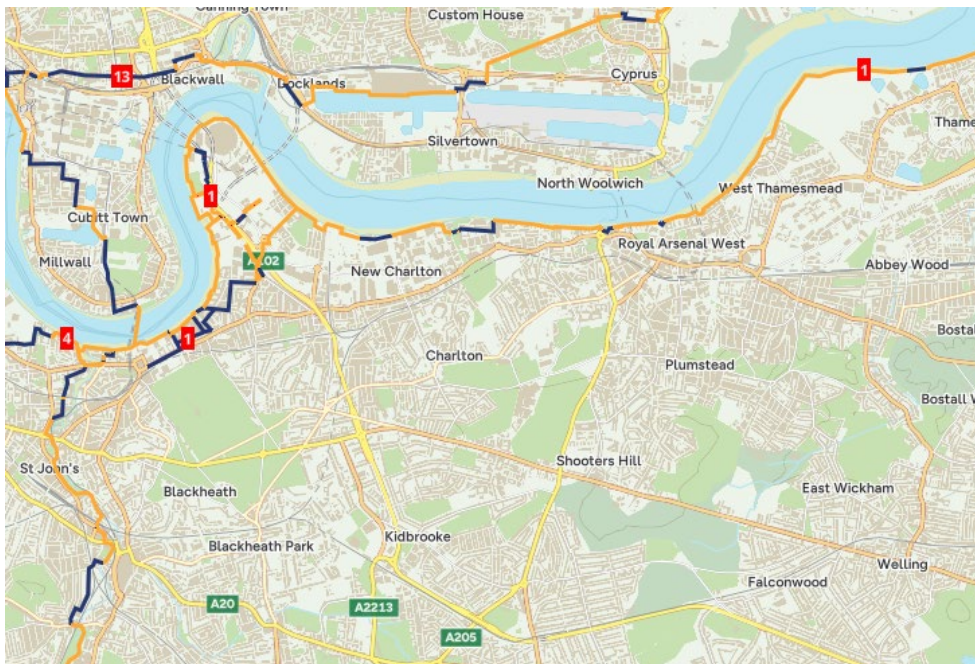


Figure 25: National Cycle Network Routes in RB Greenwich¹⁰⁰

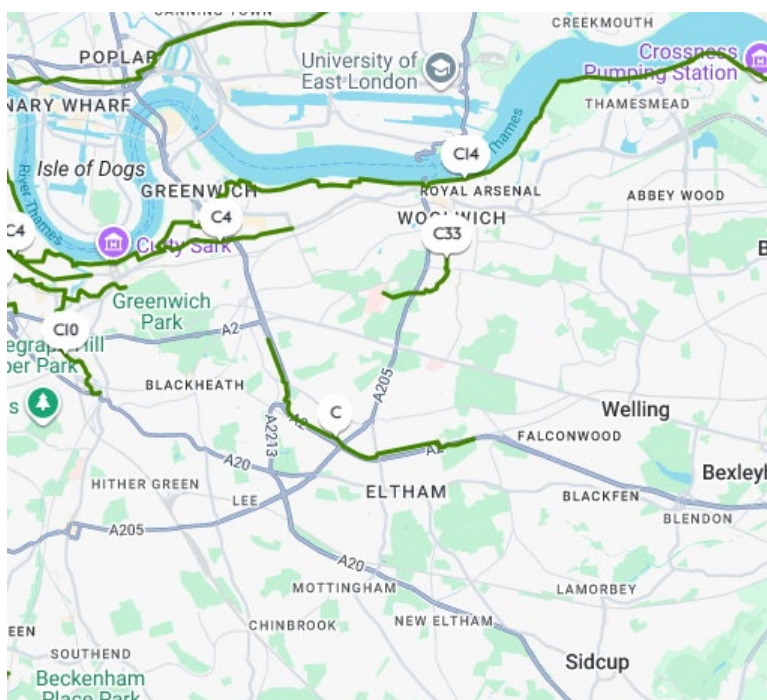


Figure 26: TfL Cycle Routes in RB Greenwich¹⁰¹

Likely future environmental conditions

Over the plan period to 2037, the Royal Borough of Greenwich is expected to face increasing environmental pressures driven by population growth, urban development, and climate change. Climate projections indicate more frequent and intense extreme weather events, including heatwaves and surface water flooding. The Urban Heat Island effect is

¹⁰⁰ [The National Cycle Network - Sustrans.org.uk](https://www.sustrans.org.uk)

¹⁰¹ [Cycle - Transport for London](https://www.tfl.gov.uk)

likely to intensify in densely developed areas, increasing the need for green infrastructure, tree planting, and climate-adaptive design.

The borough's rich natural and historic environment will become increasingly valuable for biodiversity, climate resilience, and public wellbeing. Development will need to be sensitive to the need to protect and enhance biodiversity, with Biodiversity Net Gain contributions forming a key mechanism in future planning.

Areas in the north of the borough face the greatest climate risks from flooding and extreme heat. These areas should be prioritised for increased green infrastructure, improved flood defences, and flood-sensitive development designs. Sustainable Urban Drainage Systems (SuDS) will be critical to mitigating flood risk and enhancing resilience.

Air quality remains a key challenge. Despite some progress in reducing emissions, 80% of Greenwich's Lower Super Output Areas (LSOAs) fall within the highest decile for pollution levels in London. The borough's designation as an Air Quality Management Area (AQMA) and the presence of eight Air Quality Focus Areas (AQFAs) highlight the need for targeted interventions.

Noise pollution is also expected to persist, particularly in areas adjacent to major roads, railways, and London City Airport. Development proposals in these locations will need to consider noise mitigation measures, such as insulation and layout design, to protect residents' health and wellbeing. This is especially relevant in Thamesmead, where aviation noise may impact residents.

Although Greenwich produces less CO₂ per capita than London and England averages, emissions are concentrated in the domestic and transport sectors. Reducing energy demand in these sectors is critical to achieving net zero.

The borough's social housing stock is rated relatively poorly in EPC ratings. Retrofitting programmes and estate regeneration will be essential to improve energy efficiency. Electrification of transport and heating, alongside the expansion of district heat networks, will also contribute significantly to emissions reduction and public health improvements.

Recycling rates remain below the London average and are declining, particularly in flatted developments. As the number of flatted developments grows, maintaining recycling performance will become more challenging. Greenwich's waste management system will need to adapt to increasing demand and alternative, innovative solutions should be explored.

Water resources are under significant pressure due to population growth and climate change. The Thames Water Region is already classified as facing serious water stress, with demand projected to exceed supply by 2045. Water-efficient design will need to be a consideration.

Cycling and other active travel modes must be promoted through safe routes, efficient siting of new development, and car-free schemes.

Greenwich's environmental future will depend on its ability to balance growth with sustainability. Strategic planning, investment in green infrastructure, and robust

environmental policies will be essential to protect the borough's natural assets, improve resilience, and support the health and wellbeing of its residents.

Relevant Plans, Programmes & Strategies

A review of plans, programmes and strategies has been carried out to ensure that any relevant information contained within the documents is taken on board for the preparation of Royal Greenwich's Local Plan as required by the SA/SEA process. The relevant documents are set out below and grouped as International; National; Regional; (London wide, including Neighbouring Authorities and Local (Royal Borough of Greenwich)

International

- WHO Age-friendly Cities Guide (2007)
- Commitments arising from the Paris Agreement (2016) on climate change
- The European Convention on the Protection of Archaeological Heritage
- The Convention for the Protection of the Architectural Heritage of Europe
- Kyoto protocol to the United Nations framework convention on climate change (2005)
- The World Summit on Sustainable Development – Commitments arising from Johannesburg Summit United Nations (2002)
- UNESCO World Heritage Convention
- United Nations Sustainable Development Goals (2015)
- EU Biodiversity Strategy for 2030 (2020)
- EU Environment Action Programme to 2030
- EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)
- European Landscape Convention (ratified by the UK Government in 2006)
- EU Air Quality Directive (2008/50/EC)
- EU Environmental Noise (END) Directive (2002/49/EC)
- EU Natural Habitats Directive (1992/43/EEC)
- EU Conservation of Wild Birds Directive (2009/147/EC)
- EU Energy Performance of Buildings Directive (2002/91/EC)
- EU Environmental Impact Assessment (EIA) Directive (2014/52/EU)
- EU Floods Directive (2007/60/EC)
- EU Groundwater Directive (2006/118/EC)
- EU Landfill Directive (1999/31/EC)
- EU Waste Framework Directive (2008/98/EC)
- EU Promotion of the use of Biofuels or other Renewable Fuels for Transport Directive (2003/30/EC)
- EU Renewable Energy (EU Directive 2009/28/EC)
- EU Strategic Environmental Assessment (SEA Directive 2001/42/EC)
- EU Urban Waste Water Directive (91/271/EEC)
- EU Water Framework Directive (EU Directive 2000/60/EC)
- EU Industrial Emissions Directive (Directive 2010/75/EU)

National

- Air Quality Standards Regulations 2010
- Ancient Monument and Archaeological Area Act 1979
- Environment Act 1995 (updated 2007) *This has not been fully repealed by the 2021 Environment Act
- Environment Act 2021

- Equality Act 2010
- Clean Air Act 1993
- Climate Change Act 2008
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Planning Act 2008
- Planning and Compulsory Purchase Act 2004
- Town and Country Planning (Local Planning) (England) Regulations 2012
- National Planning Policy Framework (2024)
- Planning Practice Guidance
- National Planning Policy for Waste (2014)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) Department for the Environment, Food and Rural Affairs
- Fixing our broken housing market (2017) *Department of Communities and Local Government*
- Levelling-up and Regeneration Act 2023
- White Paper: Planning for the Future (2020) *Ministry of Housing, Communities and Local Government*
- Air pollution: Action in a Changing Climate (2010) *Department for the Environment, Food and Rural Affairs*
- Conservation Principles, Policies and Guidance for the sustainable management of the historic environment (2015) *Historic England*
- Energy Efficiency and Historic Buildings: How to improve energy efficiency (2018) *Historic England*
- Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency (2024), *Historic England*
- Historic England's Future Strategy 2021-2033
- Planning Note 3: The Setting of Heritage Assets 2nd Edition (2017), *Historic England*
- Advice Note 4: Tall Buildings (2022), *Historic England*
- Understanding Place: Historic Area Assessment (2017), *Historic England*
- Housing and Planning Act 2016
- The Clean Air Strategy (2019)
- UK plan for tackling roadside nitrogen dioxide concentrations (2017) *Department for Environment Food and Rural Affairs, Department for Transport, Scottish Government, Department of Agriculture Environment and Rural Affairs, Welsh Government*
- Secured by Design - Commercial developments (2023) *Official Police Security initiative*
- Secured by Design - Homes (2016) *Official Police Security initiative* *A updated version has been published in 2025
- The Air Quality Strategy for England (2023), *Department for Environment, Food and Rural Affairs*
- Air quality plan for nitrogen dioxide (NO₂) in the UK (2017)
- EA2025 creating a better place (2020-2025), *Environment Agency*
- London Borough Environmental Fact Sheet (2011), *Environment Agency*
- Working Together to Promote Active Travel. A briefing for local authorities (2016) *Public Health England*
- 2010 Local Authority Carbon Dioxide Figures (2012) *Department of Climate and Energy Change* *The latest version (Published July 2025) covers emissions data from 2005-2023

Regional

- The London Plan 2021
- Affordable Housing LPG 2017
- Better Environment, Better Health: A GLA guide for London Boroughs 2013
- Energy Assessment Guide: GLA Guidance on preparing energy assessments 2022
- The London Housing Strategy 2018
- Good Growth by Design 2022, *Greater London Authority*
- Health Issues in Planning - Best Practice Guidance 2007
- Housing SPG 2016
- Industrial Land and Uses LPG 2023 (Draft)
- London Local Air Quality Management (LLQAM) 2019, *The Mayor of London*
- London Net Zero 2030: An Updated Pathway, *The Greater London Authority*
- London Office Policy Review 2017, *Ramidus Consulting Limited & CAG Consulting*
- London View Management Framework SPG 2012
- The Mayor's Air Quality Strategy 2010
- Air Quality Strategy: Cleaning London's Air 2014
- London Environment Strategy 2018
- Culture for All Londoners 2018
- The Mayor's Economic Development Strategy for London 2018
- London's Foundations Supplementary Planning Guidance 2012
- London World Heritage Sites SPG 2012
- The London Climate Resilience Review 2024
- Managing risks and increasing resilience: the Mayor's climate change adaptation strategy 2011
- Mayor's Transport Strategy 2018
- The River Action Plan 2013
- Securing London's water future: the Mayor's Water Strategy 2011
- Urban Greening Factor LPG 2023
- Circular Economy Statement LPG 2022
- Whole Life-Cycle Carbon Assessments LPG 2022
- 'Be Seen' Energy Monitoring LPG 2021
- Air Quality LPG 2022
- Thames Estuary 2100 Plan 2012, *Environment Agency*
- Thames flood risk management plan (FRMP) 2021 to 2027 (2022) *Environment Agency*
- Thames River Basin District River Basin Management Plan (Updated 2022), *Department of Environment, Food and Rural Affairs*
- Thames Vision 2050 (2023), *Port of London Authority*
- Preparing Borough Tree and Woodland Strategies SPG 2013
- Digital Connectivity Infrastructure LPG 2024
- Mayor's Police and Crime Plan 2022- 2025
- Violence Against Women and Girls (VAWG) Strategy 2022-2025, *The Mayor of London*

Neighbouring Authorities

- London Borough of Lewisham Local Plan (Adopted 2025)
- London Borough of Bexley Local Plan (Adopted 2023)
- London Borough of Bromley Local Plan (Adopted 2019)

- London Borough of Newham Local Plan (Adopted 2018) ****Newham is currently reviewing their Local Plan which is now at examination stage***
- Tower Hamlets Local Plan (Adopted 2020)

Local

- Anchored in Greenwich A Community Wealth Building Strategy 2022
- Authority Monitoring Report 2023/2024
- Carbon Neutral Plan
- Childcare Sufficiency Assessment Annual Update 2022
- Children and Young People's Plan 2024-2029
- Community Resource Strategy
- Core Strategy 2014
- Corporate Capital Strategy, 2024
- Corporate Parenting Partnership Strategy 2023-2025
- Our Greenwich Corporate Plan 2024
- Culture Strategy 2024-2030
- Cycling Strategy 2014
- Flood Risk Strategy 2015
- Health and Wellbeing Strategy 2023-2028
- Housing and Homelessness Strategy 2023-2028
- Inclusive Economy Strategy 2024-2034
- Joint Adults Carers Strategy 2022-2027
- Local Development Scheme 2024
- Market Sustainability Plan (Care Homes), 2023
- Parking Strategy July 2014
- Parks and Open Spaces Strategy
- Physical Activity and Sport Strategy 2019-2023
- Playing Pitch Strategy 2015-2028
- Private Sector Housing Enforcement Policy 2024
- Property Asset Strategy 2019
- Air Quality Annual Status Report 2023
- Serious Violence Strategy 2024
- Social Mobility Plan 2019
- Suicide Prevention Strategy 2023-2028
- Transport Strategy 2022-2032
- Waste Strategy 2016-2025

Sustainability Objectives

Defined objectives, supported by detailed sub-criteria in the IIA Framework are fundamental to the assessment process. They establish a consistent framework for evaluating the likely impacts of policies within the Royal Borough's Local Plan, ensuring that their contribution to sustainable development can be fairly assessed.

Key sustainability issues have been derived from examination of the baseline information and the review of relevant plans, programmes and strategies. This has subsequently informed the setting of eleven sustainability objectives.

Many of the objectives will overlap in terms of sustainability issues and others may be in conflict. The impact of this will be more evident in the next stage of the IIA when the individual policies in draft Local Plan are assessed against the objectives.

IIA Objective 1 Encourage sustainable transport and enhance connectivity - Improve public transport links, encourage active travel and improve connectivity to reduce reliance on private vehicles. Encourage the transition to low and zero emission vehicles and support the use of sustainable freight solutions. (*Sustainable Transport and Connectivity*)

IIA Objective 2 Enhance the public realm - Use spaces and streets more effectively, integrating a Healthy Streets approach and prioritise kerbside space according to need. Improve the safety and functionality of streets and public spaces, prioritise sustainable transport modes and active travel and ensure accessibility for all. (*Public Realm*)

IIA Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs - Secure a reliable supply of safe, sustainable, and well-maintained housing for all, across a range of housing types and tenures addressing specific local needs. (*Housing*)

IIA Objective 4: Build resilient and inclusive communities – Deliver vibrant, safe, and sustainable neighbourhoods with affordable and accessible homes and accessible quality community infrastructure. (*Communities*)

IIA Objective 5: Respect the Royal Borough's open spaces - Conserve and enhance the borough's natural habitats, biodiversity and water bodies. Ensure that public spaces meet community needs, promote active lifestyles, and foster social cohesion. Address open space deficiencies and seek opportunities for further greening. (*Open spaces*)

IIA Objective 6: Accelerate sustainable, climate resilient development - Drive the transition to net zero by promoting energy efficiency in existing buildings through retrofit programmes, requiring high standards of sustainable construction, deploying renewable energy and low carbon / district heating networks. Incorporate mitigation and adaption measures to reduce and respond to the impacts of climate change. (*Climate Resilience*)

IIA Objective 7: Improve environmental resilience and resource efficiency - Enhance the borough's resilience by reducing and managing flood risk, improving air quality, increasing biodiversity, reducing waste and driving a circular economy. (*Environment*)

IIA Objective 8: Sustain and enhance the Royal Borough's culture and built heritage - Sustain and enhance Royal Greenwich's built environment and townscape, ensure design is of an exemplary standard and respect local distinctiveness (*Heritage*)

IIA Objective 9: Revitalise town centres, high streets and cultural assets - Create vibrant, prosperous and well-maintained town centres, high streets and shopping parades. Encourage a vibrant and safe night-time economy, encourage creative, cultural, and heritage offerings to attract visitors and support local businesses. (*Town Centres and Culture*)

IIA Objective 10: Support and promote inclusive economic growth and boost employment opportunities - Promote sustainable, resilient and inclusive economic growth and regeneration. Protect and make efficient use of existing industrial spaces and ensure they can adapt to meet the evolving and diverse needs of modern businesses to support the local and regional economy. Encourage infrastructure investment to support economic growth. Support local businesses and empower residents to access quality, secure jobs and training. (*Economic Growth*)

IIA Objective 11: Improve the quality of life, safety and health and wellbeing of communities - Improve the lives of residents and reduce health inequalities through access to safe, secure affordable homes as well as employment, healthcare and community facilities. Create an environment that promotes physical and mental well-being and ensure that neighbourhoods are vibrant, safe, and attractive, with opportunities for active living. (*Health and Wellbeing*)

Relationship between IIA objectives and SEA issues

The IIA report will incorporate a Strategic Environmental Assessment (SEA). The table below outlines the relationship between the eleven IIA objectives set out above, and the SEA issues that are required for consideration in Annex 1 of the SEA Directive.

Key SEA Issues	IIA Objectives
Biodiversity	5, 7
Population	1, 2, 3, 4, 9, 10, 11
Human Health	1, 2, 3, 4, 6, 7, 9, 10, 11
Fauna	5, 7
Flora	5, 7
Soil	5, 6, 7
Water	5, 6, 7
Air	1, 2, 6, 7
Climatic Factors	1, 6, 7
Cultural Heritage	8, 9
Landscape	2, 5, 8, 9

The IIA Assessment Framework

The IIA Assessment Framework provides the methodology to consistently evaluate the environmental, social and economic impacts, and the health and equalities implications of the policies within the Royal Greenwich Local Plan.

The sub-criteria questions help in analysing the issues to be considered for each objective, with those questions particularly relevant for assessing the health and equalities implications identified with a * for the **Equalities Impact Assessment (EqIA)** and a * for the **Health Impact Assessment (HIA)**.

Sustainability Objective	Sub criteria for assessment Including EqIA* / HIA* considerations
IIA Objective 1: Encourage sustainable transport and enhance connectivity	<ul style="list-style-type: none"> a) Will it improve public transport accessibility for all users? ** b) Will it reduce the reliance on private vehicles and promote using low carbon ways of travel? * c) Will it support infrastructure for low/zero emission vehicles? d) Will it improve sustainable freight efficiency? e) Will it enhance connectivity between homes, jobs, services and green spaces in the Royal Borough? **
IIA Objective 2: Enhance the public realm	<ul style="list-style-type: none"> a) Will it improve the design, safety and accessibility of streets and public spaces? ** b) Will it ensure that kerbside is allocated to reflect local needs? c) Will it promote inclusive access for all residents? ** d) Will it enhance the character and identity of places and communities through public realm improvements? e) Will it help people connect, build a stronger community, and create a sense of belonging? ** f) Will it encourage active travel and social interaction? *
IIA Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs	<ul style="list-style-type: none"> a) Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability? ** b) Will it increase housing supply for all? c) Will it encourage sustainable housing developments to be of an appropriate density, high quality and well designed? d) Will it support housing that is energy efficient and climate resilient? *

IIA Objective 4: Build resilient and inclusive communities	<ul style="list-style-type: none"> a) Will the policy support development of neighbourhoods with access to education, healthcare and community facilities? ** b) Will it promote social inclusion and reduce inequalities across the Royal Borough? ** c) Will it encourage community participation in shaping sustainable development? d) Will it improve safety and resilience to social, economic and environmental challenges?
IIA Objective 5: Respect the Royal Borough's open spaces	<ul style="list-style-type: none"> a) Will it protect and enhance parks, green spaces and habitats? b) Will it improve open space accessibility for recreation and wellbeing? * c) Will it protect and enhance biodiversity and ecology? d) Will it promote urban greening through tree planting and landscaping? e) Will it ensure equitable access to green spaces across all communities? **
IIA Objective 6: Accelerate sustainable, climate resilient development	<ul style="list-style-type: none"> a) Will the policy promote a high standard of sustainable construction and design? * b) Will it support retrofitting of existing buildings within the borough to improve energy efficiency? c) Will it promote renewable energy and low carbon heating systems? d) Will it support the reduction of carbon emissions in line with net zero targets? * e) Will climate adaptation measures be supported?
IIA Objective 7: Improve environmental resilience and resource efficiency	<ul style="list-style-type: none"> a) Will the policy reduce and manage flood risk through sustainable measures? * b) Will it improve water and air quality in the borough? * c) Will it support the enhancement of biodiversity, ecology and habitats? d) Will it contribute to the reduction of waste and support recycling and a circular economy? e) Will it encourage efficient use of land, energy and materials? f) Will it ensure environmental improvements benefit all communities equally? *
IIA Objective 8: Sustain and enhance the Royal Borough's culture and built heritage	<ul style="list-style-type: none"> a) Will the policy protect and enhance heritage assets and conservation areas? b) Will it ensure that new development respects the local character of the Royal Borough? c) Will it promote high quality design that reflects the Royal Borough's identity? *

	d) Will it promote access to cultural spaces for wellbeing? *
IIA Objective 9: Revitalise town centres, high streets and cultural assets	a) Will this policy support regeneration of town centres and high streets? b) Will it encourage a diverse mix of commercial uses? c) Will it promote a safe and vibrant night-time economy? ** d) Will it enhance the public realm in commercial and cultural areas? e) Will it support cultural industries? *
IIA Objective 10: Support and promote inclusive economic growth and boost employment opportunities	a) Will the policy protect and optimise employment land for businesses? b) Will it support and encourage local businesses? c) Will it improve access to training, education and employment for all residents? ** d) Will the appropriate infrastructure be improved to support economic growth?
IIA Objective 11: Improve the quality of life, safety and health and wellbeing of communities	a) Will it improve mental and physical wellbeing through safe environments? * b) Will it promote safe, inclusive and vibrant neighbourhoods for all residents? * c) Will it reduce health inequalities across the Royal Borough? **

The anticipated effects of each draft policy in Royal Greenwich's Local Plan will be analysed against each of the 11 sustainability objectives and sub criteria in the Integrated Impact Assessment Framework and will be scored using the key below.

Significance of the effects	Description of the effect
++ Major Positive	Expected to deliver significant and lasting benefits across a large area of the Royal Borough, positively impacting a large number of people and environmental factors. The effects are likely to be direct and a substantial magnitude.
+ Minor Positive	The anticipated beneficial effects are likely to be limited to smaller areas of the Borough smaller groups of people and environmental factors. These effects may be direct or indirect, temporary or reversible. The effects are likely to be considered as minor.
0 Neutral	Neutral effects are anticipated where the policy under the assessment is unlikely to result in any meaningful change to the existing or future baseline situation.
- Minor negative	Minor negative effects are expected to be limited to smaller areas of the borough, limited small groups of people and environmental factors. These factors may be direct or indirect, temporary or reversible.
-- Major negative	Likely to affect the whole or larger area of the Royal Borough, impacting a large number of people and environmental factors. This also applies to nationally or internationally important assets. The effects are likely to be direct, irreversible, permanent and of a substantial magnitude.
? Uncertain	The significant criterion is applied in cases where there is insufficient information to support a conclusive assessment. It is also used when evaluation options that present both positive and negative effects and where it is unclear where the positive or negatives outweigh each other.

The IIA Framework will include commentary which will identify likely significant effects, suggest potential mitigation measures and highlight any uncertainties or assumptions where relevant, depending on the scope of the policy being assessed.

Next Steps

This scoping report forms the first stage of the Integrated Impact Assessment. Consultation with the consultation bodies on the scope of the sustainability appraisal report will complete Task A of the Sustainability Appraisal.

Assessment of the emerging draft policies has taken place alongside preparation of the new Local Plan, using the IIA Framework contained herein. An Integrated Impact Assessment Report, detailing the process undertaken and the results of the assessment of policies is published alongside the Regulation 18 Local Plan.

Appendix 2: Effects of Local Plan Policies

Appendix 2: Effects of Draft Local Plan Policies

Spatial Area Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
P1 Greenwich, Westcombe Park and Blackheath	+	+	++	0	+	0	+	++	++	+	+
P2 Greenwich Peninsula	+	0	++	+	+	0	0	+	+	++	+
P3 Charlton	++	+	++	++	+	0	0	+	+	++	+
P4 Woolwich	+	+	++	++	0	0	0	++	++	+	+
P5 Thamesmead and Abbey Wood	++	+	++	+	+	0	0	+	++	+	+
P6 Plumstead and Shooters Hill	+	0	+	0	0	0	0	+	+	0	0
P7 Eltham, Avery Hill, Coldharbour and New Eltham	0	+	+	+	0	0	0	+	+	0	+
P8 Kidbrooke and Middle Park	0	+	+	0	+	0	0	+	+	0	0

Policy P1: Greenwich, Westcombe Park and Blackheath

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive impact on increasing housing supply with the policy requiring delivery of a sustainable mix of sensitively designed development across the area to support homes, contributing to Royal Greenwich's 15- year housing supply. This will be achieved on a mix of site allocations and infill development and intensification. The policy supports the regeneration and optimisation of sites to deliver homes, particularly in the Deptford Creek/Greenwich Riverside Opportunity Area. In addition, development that enables transit-oriented and sustainable growth, with higher densities near train stations supported within the policy.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Significant Effect: Major positive impact on sustaining and enhancing Royal Greenwich's built environment and townscape, with the policy seeking that development respects and enhances the individual character, heritage assets, and open spaces of each neighbourhood. It provides detailed requirements for the preservation and enhancement of heritage assets and conservation areas within each area, as well as the Greenwich Town Centre, the World Heritage Site and the Greenwich Market as a unique community asset.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: The policy supports the vitality, vibrancy and viability of Greenwich Town Centre, East Greenwich Centre, Blackheath Centre and Westcombe Park neighbourhood by providing bespoke policy direction on the growth, protection, distinctiveness and anticipated uses within each area.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact with the policy enabling transit-orientated growth with higher densities near train stations, reduced car dependency, improved infrastructure for walking and cycling, and enhancing connectivity between centres, surrounding neighbourhoods, and the Thames Path.

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact with the policy promoting high-quality design, placemaking and infrastructure delivering development that supports active travel, environmental resilience, and improved public realm across the area. The policy supports improvements to accessibility, wayfinding, and public spaces.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: The policy supports safeguarding and enhancing of open spaces of each neighbourhood, including enhancing access to green space within Westcombe Park and protecting and enhancing the open space network in Blackheath for biodiversity, recreation, and heritage value. The policy also looks to enhance the green and blue infrastructure of the area and enable improved access to nature.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely Effect: Minor positive impact in that the policy seeks to safeguard and enhance open space and environmental resilience by managing open spaces to preserve their character and ecological value.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Effect: Minor positive effect with the policy supporting a mix of development across the area to support new jobs, as well as supporting new visitor attractions within the areas. The policy also encourages a mix of retail, leisure, cultural and employment uses, including the night-time economy, particularly within Greenwich Town Centre and Blackheath Town Centre.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impacts through encouraging active travel uses and infrastructure improvements, improvements to public realm and green spaces and support for sustainable development to support new jobs and homes.

Policy P2: Greenwich Peninsula

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive impact with the policy supporting development in the Greenwich Peninsula Opportunity Area to deliver at least 17,000 new homes in well-designed, sustainable and inclusive neighbourhoods.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Significant Effect: Major positive impact with the policy supporting the creation of 15,000 jobs new jobs within the area by protecting and intensifying SIL and through delivering employment space for the cultural and creative industries including in the Design District the role of which will be maintained and enhanced.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact of improved connectivity and permeability across the Peninsula, including enhanced pedestrian and cycle routes and better integration with the Thames Path, and an improved bus-station.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact with the policy supporting the delivery of well-designed, sustainable and inclusive neighbourhoods.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: The policy supports the delivery of new and enhanced green infrastructure, including Central Park and a network of public open spaces.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact with the policy supporting employment spaces for cultural and creative industries, as well as high-quality development that responds to the Peninsula's riverside setting and industrial heritage.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive impact with the policy enabling delivery of a new District Centre focused around North Greenwich Station, with a vibrant mix of uses including the Design District and a high-quality public realm.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact on improving the lives of residents and reducing health inequalities through improved connectivity across the Peninsula, including enhanced pedestrian and cycle routes, and new and improved green infrastructure provision.

Policy P3: Charlton

Major Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Significant Effect: Major positive impact with the policy seeking to improve public transport accessibility through the delivery of a new riverside bus route and enhanced walking and cycling infrastructure, reducing car dependency and connecting new and existing communities, while also strengthening links to the River Thames and elevating the quality of the Thames Path.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive impact with the policy seeking to deliver a sustainable and inclusive urban neighbourhood through the masterplan-led regeneration of Charlton Riverside Opportunity Area, providing 8,000 new homes to contribute significantly to Royal Greenwich's 15-year housing supply. The policy seeks that development supports a mix of tenures, including genuinely affordable housing.

- **Objective 4: Build resilient and inclusive communities**

Likely Significant Effect: Major positive impact with the policy seeking that development contributes to a balanced and thriving community. The policy supports creating vibrant mixed-use quarters, integrating homes, employment, including affordable workspace, community infrastructure, including an all-through school, and high-quality public realm.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Significant Effect: Major positive impact through the delivery of 1,000 new jobs within the Charlton Riverside Opportunity Area, the safeguarding and intensifying of Strategic Industrial Locations at Charlton Riverside West and East, supporting a range of industrial, logistics, and waste management uses, and supporting and nurturing the creative and cultural economy, particularly the thriving cluster centred around Thameside Studios. The policy also enables co-location and employment growth within the Locally Significant Industrial Site to deliver intensified employment floorspace, including affordable workspace, as well as the transformation of underutilised industrial estates and retail parks into vibrant mixed-use quarters.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: The policy supports the creation of high-quality public realm alongside the transformation of underutilised industrial estates and retail parks into vibrant mixed-use quarters. This is also supported through elevating the quality of the Thames Path and strengthening connectivity to the River.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: The policy seeks to protect and enhance green infrastructure, including the creation of a new linear park.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact with the policy seeking to protect and enhance heritage assets.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: The policy requires the consolidation of retail activity along Bugsby's Way and establishes a new local centre to serve day-to-day needs, linking the riverside area to Charlton Station.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: The policy seeks to deliver safe and inclusive urban neighbourhoods within the Charlton area with improvements to mental and physical wellbeing through increased green space provision, improved active and public transport infrastructure, employment and housing.

Policy P4: Woolwich

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive impact with the policy requiring a sustainable mix of medium and high-density development across Woolwich to support homes, contributing to Royal Greenwich's 15- year housing supply. This is to be achieved through a mix of housing delivery mechanisms including site allocations, infill development and intensification—to support mixed and balanced communities. The policy seeks to ensure regeneration schemes and estate renewal to deliver high-quality homes across a range of tenures, including genuinely affordable housing. Transit-orientated and sustainable growth are supported, alongside regeneration and optimisation of sites to delivery homes.

- **Objective 4: Build resilient and inclusive communities**

Likely Significant Effect: Major positive impact with the policy seeking to support mixed and balanced communities with the provision of new jobs and homes, and that both existing and new communities benefit from regeneration schemes. The policy also seeks to support a diversified evening and night-time economy that fosters community cohesion, and creates safe, inclusive, accessible and resilient environments.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Significant Effect: The policy reinforces Woolwich's role as a cultural hub, enabling creative and cultural spaces and a diversified evening and night-time economy. It supports regeneration that responds sensitively to heritage designations and to provide placemaking and architecture that reflect Woolwich's unique character. This includes protecting and enhancing Woolwich Market and Royal Arsenal Market as unique community assets, and encouraging the preservation, enhancement and sensitive re-use of key historic buildings to preserve the area's diverse heritage assets and character to ensure a distinctive place with a strong identity.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Major positive impact through the policy reinforcing Woolwich Town Centre's role as the borough's civic, cultural, retail, leisure, and employment hub, supporting a diverse mix of uses, meanwhile uses to activate vacant and underused spaces, and a diversified evening and night-time economy that fosters community that fosters community cohesion and strengthens its borough-wide and London-wide significance.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive effect with the policy supporting higher densities near train stations, reduced car dependency, and improved infrastructure for walking and cycling, while enhancing connectivity between Woolwich Town Centre, surrounding neighbourhoods, and the Thames Path.

- **Objective 2: Enhance the public realm**

Likely Effect: The policy promotes high-quality placemaking through public spaces, streetscapes, increased green infrastructure provision, public realm improvements and architecture that reflect Woolwich's unique character, whilst ensuring regeneration schemes and estate renewal deliver inclusive and accessible public realm.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Effect: The policy seeks to deliver a mix of uses and development within the area to support new jobs, retail, leisure, and employment opportunities, whilst enabling meanwhile uses to activate vacant and underused spaces, and a diversified evening and night-time economy. It also supports regeneration to deliver commercial spaces, and the protection and enhancement of its Woolwich Market and Royal Arsenal Market.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: The policy seeks to deliver safe, inclusive, accessible and resilient environments and provide clear community benefits for existing and new communities through regeneration schemes. It seeks improvements to communities' mental and physical wellbeing through increased green infrastructure provision, improved active transport infrastructure, employment and housing.

Policy P5: Thamesmead and Abbey Wood

Major Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Significant Effect: Major positive impact with the policy seeking to capitalise on the opening of the Elizabeth Line to Abbey Wood and enable further transformational public transport improvements including the extension of the Docklands Light Railway (DLR) to Thamesmead, rapid bus transit, river services, and enhanced walking and cycling infrastructure, to reduce isolation and car dependency and improve access to jobs, services and amenities.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive impact through promoting a sustainable mix of medium and high-density development, to support new homes across a range of tenures, including genuinely affordable housing, to contribute to Royal Greenwich's 15-year housing supply, achieved through site allocations and intensification of existing areas. The policy also supports the retention of the existing Travellers Site at Thistlebrook, and allocates land for a new Travellers' site, ensuring provision for culturally appropriate accommodation and supporting the needs of the Gypsy and Traveller community.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Major positive impact through the policy supporting rejuvenation of the Thamesmead town centre around a new DLR station, as a vibrant hub for retail, leisure, employment and community life, with a mix of uses and public spaces.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: The policy promotes high-quality placemaking, with development that embraces the area's waterfront setting, integrates blue and green infrastructure into the urban fabric and delivers improved public realm and neighbourhood connectivity.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact with the policy supporting mixed and balanced communities through promoting sustainable development and provision of new jobs and homes over the life of the plan. The policy seeks to benefit both new and existing communities through high-quality placemaking and new development, including supporting the needs of the Gypsy and Traveller community.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive impact with public access to a new Riverside Park and the delivery of multifunctional green and blue infrastructure across the Thamesmead Waterfront site.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact with the policy requiring development to celebrate and protect the area's munitions legacy through sensitive integration of surviving features into the evolving landscape.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Effect: The policy promotes development that supports new jobs within the area, as well as protecting and proactively intensify existing employment land, including Strategic and Locally Significant Industrial Locations, to unlock its full potential, support a growing local economy and deliver new jobs across industrial, creative and commercial sectors.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impacts on physical and mental wellbeing through enhanced walking and cycling infrastructure, better connectivity and integration of blue and green infrastructure into the urban fabric.

Policy P6: Plumstead and Shooters Hill

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact through the policy supporting new active travel routes between Abbey Wood, Plumstead, Plumstead Common and Shooters Hill areas and Woolwich.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: Minor positive impact in that the policy supports proposals for higher density residential development concentrated in Plumstead District Centre and around Plumstead Station.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: The policy seeks that development is in keeping with local character and distinctiveness, that development respects local heritage, especially within Plumstead Common and Shrewsbury Park Estate Conservation areas, and where impacting on listed buildings or their settings, and does not harm locally protected views. The policy also seeks that development increases the legibility of large institutional buildings.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive impact with the policy seeking that development improves the vitality of Plumstead High Street as a district centre.

Policy P7: Eltham, Avery Hill, Coldharbour and New Eltham

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact in that the policy supports development that delivers high-quality placemaking, with public spaces, streetscapes, and architecture that celebrate the sub-area's distinctive character, creating safe, attractive, and inclusive environments for everyone.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: The policy supports development that intensifies underutilised land in the town centre to contribute to sensitive local growth, and which helps to meet wider Royal Greenwich housing needs and fosters mixed and balanced communities by locating small scale housing in sustainable places close to Eltham Town Centre or established transport hubs.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact with the policy supporting the delivery of safe, attractive, and inclusive environments for everyone, and the provision of housing which meets housing needs and fosters mixed and balanced communities.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: The policy supports development which respects local heritage especially within Eltham Palace, Well Hall Pleasaunce, Progress Estate, and Eltham Green Conservation areas or where impacting on heritage assets or their settings. It also supports development which is in keeping with the local character and respects the human scale of its surroundings with buildings remaining low rise to match local scale and form outside of the town centre.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive impact with the policy supporting development which reinforces Eltham Town Centre's role as a key retail, leisure and service destination in the South of the Borough while supporting a diverse mix of uses.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact in that the policy supports development which contribute to creating safe, attractive, and inclusive environments for everyone.

Policy P8: Kidbrooke and Middle Park

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact with the policy supporting development that delivers public realm improvements, including connected streets and routes that integrate the area with safe connections to the railway station, existing neighbourhoods and roads.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: The policy supports development that contributes towards meeting wider Royal Greenwich housing need whilst siting higher density housing in sustainable locations close to Kidbrooke station.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: The policy supports development that enhances and preserves the accessibility, operational functionality, ecology and visual amenity of parks and other public open spaces.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact with the policy supporting development that respects local heritage especially within, and in the setting of The Eltham Green, Progress Estate, Blackheath Park and The Sun In The Sands Conservation areas, and/or where impacting on listed buildings, their settings, or local views. The policy also supports development which is in keeping with local character and distinctiveness.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: The policy supports development that promotes and enhances the vitality and viability of the Lee Green District Centre and supports the new local centre in the Kidbrooke Village, where applicable.

Housing Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
H1 Meeting housing needs	+	0	++	+	0	0	0	0	+	0	++
H2 Affordable housing	0	0	++	++	0	0	0	0	0	0	++
H3 Housing mix	0	0	++	++	0	0	0	0	0	0	++
H4 Build to Rent	+	0	++	+	+	0	0	0	+	0	++
H5 Large-scale purpose-built shared living	+	0	++	+	+	0	0	0	+	0	+
H6 Purpose Built Student Accommodation	+	0	++	+	+	0	0	0	+	0	+
H7 Sub-divisions and conversions to HMOs	+	0	+	+	0	0	0	+	0	0	+
H8 Supported and Specialist Accommodation	0	0	+	+	0	0	0	0	0	0	++
H9 Small Sites	0	0	++	0	0	0	+	+	0	0	++
H10 Gypsy and Traveller Accommodation	0	0	++	+	0	0	0	0	0	0	++
H11 Housing Quality	0	0	+	+	0	+	+	0	0	0	++

Policy H1: Meeting housing needs

Major positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely significant effect: It will significantly increase housing supply for all by focusing the delivery of new housing in Royal Greenwich's Opportunity Areas, site allocations and other highly accessible locations, including small sites and housing estates. It will ensure that homes address different needs by meeting the needs of specific groups.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: Ensuring that more people have an adequate, not overcrowded and fit for purpose home will improve their mental and physical wellbeing through safe environments and subsequently reduce health inequalities across the borough.

Minor positive effect

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely effect: This policy will promote low-carbon ways of travel and enhance connectivity between homes and jobs and services by focusing development on accessible locations such as the opportunity areas, and optimising housing density based on supporting infrastructure capacity.

- **Objective 4: Build resilient and inclusive communities**

Likely effect: The policy will promote social inclusion and reduce inequalities by promoting the provision of affordable housing and housing that meets the needs of specific groups, and requiring developments to contribute towards the creation of sustainable, mixed and inclusive communities.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely effect: The policy directs new housing to highly accessible locations, which includes town centres and high streets. Building homes, and increasing the population, in town centres contributes to their vitality and viability.

Policy H2: Affordable housing

Major positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely significant effect: This policy will support the delivery of affordable housing and therefore will ensure that local needs are met, by setting a target of 50% of all new homes in Royal Greenwich to be affordable, and a minimum of 35% affordable housing on gross residential development of 10 units and above on all other major developments.

- **Objective 4: Build resilient and inclusive communities**

Likely significant effect: If more people live in affordable housing, then they will be more resilient to social, economic, and environmental challenges. Inequalities across the borough will also be reduced as more people have access to appropriate accommodation.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: The increase of affordable housing will mean that more people will live in safe environments and therefore have improved mental and physical wellbeing. This will also lead to reduced health inequalities across the borough as people have an appropriate place to live.

Policy H3: Housing mix

Major positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely significant effect: It will support the delivery of housing that meets local needs in terms of tenure by ensuring that homes of an appropriate size are delivered in new developments based on an evidence base.

- **Objective 4: Build resilient and inclusive communities**

Likely significant effect: It will reduce inequalities across the borough as overcrowding is reduced, and families are able to live in homes that are suitable for their needs. It will also improve resilience to social, economic and environmental challenges as families are able to live in accommodation that is not overcrowded.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: It will reduce health inequalities and improve mental and physical wellbeing of residents who are able to live in homes of an appropriate size to fit their needs. It will also promote inclusive neighbourhoods as families of various sizes will be able to live in new developments.

Policy H4: Build to Rent:

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Will support the delivery of housing meeting local needs in terms of type, tenure and affordability through promoting the provision of low-cost rented housing, or if unfeasible in design terms, discount market rent units, alongside market rented homes, and supporting a mix of dwelling sizes meeting local housing needs. The policy will increase housing supply and ensures good design through the requirement to provide suitable amenity space.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Will enhance connectivity between homes, jobs, services and green spaces in development locations and reduce reliance on private vehicles through the requirement to site BtR schemes in well-connected areas with access to shops, services and open spaces.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Will support the development of neighbourhoods with access to education, healthcare and community facilities through the requirement to site BtR schemes in well-connected areas with access to services and open spaces, in addition to the requirement to provide on-site outdoor amenity space in locations of open space deficiency. It will promote social inclusion and reduce inequalities in the Royal Borough through promoting the provision of low-cost rented housing, or if unfeasible in design terms, discount market rent units, and supporting a mix of dwelling sizes meeting local housing needs.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Will improve open space accessibility for new residents and potentially existing residents and help to create equitable access to green space across all communities through the requirement to site BtR schemes in well-connected areas with access to open spaces, in addition to the requirement to provide on-site outdoor amenity space in locations of open space deficiency.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely effect: The policy directs Build to Rent housing to highly accessible locations, which includes town centres and high streets. Building homes, and increasing the population, in town centres contributes to their vitality and viability.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Will promote safe, inclusive and vibrant neighbourhoods for all residents through promoting the provision of low-cost rented housing, or if unfeasible in design terms, discount market rent units, and supporting a mix of dwelling sizes meeting local housing needs, in order to create balanced communities. It could contribute to reducing health inequalities as BtR schemes are required to be sited in well-connected areas with access to services and open spaces, which can support the physical health of residents through encouraging active travel, and improving access to health services.

Policy H5: Large-scale purpose-built shared living

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Will support the delivery of housing meeting local needs in terms of type and tenure through requiring a contribution to affordable housing elsewhere in the borough, as well as co-living units which meet demand for this housing type. The policy will increase housing supply, and ensures good design. The policy promotes housing choice.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Will enhance connectivity between homes, jobs, services and green spaces in development locations and reduce reliance on private vehicles through the requirement to site schemes in well-connected areas with access to shops, services and open spaces.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Will support the development of neighbourhoods with access to education, healthcare and community facilities through the requirement to site LSPBSL schemes in well-connected areas with access to services and open spaces, in addition to the requirement to provide on-site outdoor amenity space in locations of open space deficiency. It will promote social inclusion and reduce inequalities in the Royal Borough through requiring applications for sites over 0.5 ha to provide some conventional self-contained housing units on the same site in a separate block or area.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Will improve open space accessibility for new residents and potentially existing residents and help to create equitable access to green space across all communities through the requirement to site LSPBSL schemes in well-connected areas with access to open spaces, in addition to the requirement to provide on-site outdoor amenity space in locations of open space deficiency.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely effect: The policy directs purpose-build shared living to highly accessible locations, which includes town centres and high streets. Building homes, and increasing the population, in town centres contributes to their vitality and viability.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: It could contribute to reducing health inequalities as LSPBSL schemes are required to be sited in well-connected areas with access to services and open spaces, which can support the physical health of residents through encouraging active travel, and improving access to health services. The policy also prevents the overconcentration of similar uses which helps to create balanced, therefore inclusive and vibrant neighbourhoods.

Policy H6: Purpose-built Student Accommodation

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Will support the delivery of housing meeting local needs in terms of type, tenure and affordability through promoting the provision of affordable student bedrooms alongside market student bedrooms and encouraging developments to provide a mix of differently sized units to meet a range of needs. Requirement to provide some conventional self-contained housing units further promotes housing choice.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Significant Effect: Will contribute to reducing health inequalities as PSBSA schemes are required to be sited in well-connected areas with access to services and open spaces, which can support the physical health of residents through encouraging active travel, and improving access to health services. Preventing the overconcentration of similar uses will help to create balanced communities.

Minor Positive Effect:

- **Objective 1: Sustainable Transport and Connectivity**

Likely Effect: Will enhance connectivity between homes, jobs, services and green spaces in development locations and reduce reliance on private vehicles through the requirement to site PBSA schemes in well-connected areas with easy access to shops, services and open spaces.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Will support the development of neighbourhoods with access to education, healthcare and community facilities through the requirement to site PSBA schemes in well-connected areas with access to services and open spaces. It will promote social inclusion and reduce inequalities in the Royal Borough through requiring applications for sites over 0.5 ha to provide some conventional self-contained housing units on the same site in a separate block or area.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Will improve open space accessibility for new residents and potentially existing residents and help to create equitable access to green space across all communities through the requirement to site PSBSA schemes in well-connected areas with access to open spaces, in addition to the requirement to provide on-site outdoor amenity space in locations of open space deficiency.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely effect: The policy directs purpose built student accommodation to highly accessible locations, which includes town centres and high streets. Building homes, and increasing the population, in town centres contributes to their vitality and viability.

Policy H7: Sub-divisions and conversions to HMOs

Minor Positive Effect:

- **Objective 1: Sustainable transport and connectivity**

Likely effect: The policy will reduce the reliance on private vehicles and promote low-carbon ways of travel by ensuring that subdivided flats as well as HMOs are car-free (when in controlled parking zones) and that HMOs provide one cycle parking space per occupant.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: The policy allows sub-divisions which will enable the creation of new housing. It will also ensure that small and medium-sized family homes are retained, which will help to meet local need.

- **Objective 4: Build resilient and inclusive communities**

Likely effect: The policy will have a beneficial impact on communities by helping to ensure that neighbourhoods are not dominated by one type of housing.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely effect: The policy ensures that any conversion must respect the character of the local area.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: The policy ensures that HMOs will be of a high standard of quality which will improve mental and physical wellbeing through provision of a safe living environment.

Policy H8: Supported and Specialist Accommodation

Major positive effect

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: Preserving existing supported and specialist accommodation and requiring high standards for new accommodation will help ensure that people in need of this type of accommodation are able to access it, which will have a major positive effect on their health.

Minor positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: supporting the provision and resisting the loss of supported and specialist accommodation will support meeting local needs for this type of housing. The policy also ensures that new housing of this type will be of a high quality.

- **Objective 4: Build resilient and inclusive communities**

Likely effect: The policy will support social inclusion by requiring new supported and specialist accommodation to form part of inclusive mixed and balanced neighbourhoods and to be sited in suitably connected locations. Supported and specialist accommodation will also improve the safety and resilience of the accommodation's inhabitants.

Policy H9: Small sites

Major positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: by taking a positive approach to infill development, this policy will support an increase in housing supply for all. The policy will support densification, and ensure small-site development is high-quality and well-designed.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Significant Effect: by supporting the development of new housing with a high standard of amenity, this policy will allow more people to have a safe home, which will improve their mental and physical health.

Minor Positive Effect:

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: The policy will support the enhancement of biodiversity, ecology and habitats by specifying there must be no significant loss of wildlife habitats or other natural features in small-site development.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely effect: The policy promotes high-quality design that reflects the Royal Borough's identity and ensures that new development respects local character through stipulations around the design of housing on small sites.

Policy H10: Gypsy and Traveller Accommodation

Major positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely significant effect: This policy will enable housing to be delivered which meets the local need for gypsy and traveller accommodation.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: This policy will improve the mental and physical wellbeing of people from gypsy and traveller communities by enabling the provision of safe sites for pitches.

Minor positive effect

- **Objective 4: Build resilient and inclusive communities**

Likely effect: The policy will reduce inequalities in the borough as the gypsy and traveller community are able to live in accommodation that meets their needs.

Policy H11: Housing quality

Major positive effect

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: The policy will have a major positive effect on health and wellbeing by mandating high-quality homes, meeting space standards and providing natural light. The policy also promotes health and wellbeing by ensuring amenity space and play space are provided and ensuring that accessible housing is provided.

Minor positive effect

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**
Likely effect: This policy will encourage high-quality and well-designed, energy efficient and climate resilient housing developments.
- **Objective 4: Build resilient and inclusive communities**
Likely effect: This policy will promote social inclusion within communities by ensuring that accessible housing is provided within developments.
- **Objective 6: Accelerate sustainable, climate resilient development**
Likely effect: The policy will have a positive impact on climate resilience by promoting high standards of sustainable development, including ensuring energy efficiency and reducing overheating.
- **Objective 7: Improve environmental resilience and resource efficiency**
Likely effect: The policy will support recycling by stating that developments must provide space for the storage collection and management of waste and recycling, including food waste recycling.

Economy Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
E1 Inclusive Economy	+	0	0	+	0	0	0	0	0	++	+
E2 Protected industrial land	+	0	+	0	0	?	+	0	0	++	+
E3 Non-Designated Employment Sites	+	0	+	+	0	0	0	0	0	++	+
E4 Delivering inclusive growth	+	0	+	++	0	0	0	0	++	++	+
E5 Local employment, skills and training	0	0	0	+	0	0	0	0	0	++	++
E6 The visitor economy	0	0	0	+	0	0	0	++	++	+	+

Policy E1: Inclusive Economy

Major Positive Effect:

- **Objective 10: Support and promote inclusive economic growth and boost employment.**

Likely Significant Effect: Major positive impact on job creation and business diversity, enhanced economic resilience and regeneration and improved access to employment and entrepreneurship for local residents. There should be a direct impact on large areas of the Borough.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact with reduced reliance on private vehicles and improved connectivity between homes and jobs due to indirect link between locating business space in town centres / designated employment areas and sustainable travel. Mixed-use and flexible configurations may reduce commuting distances.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact - local employment can reduce economic inequalities.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact; indirect link between protecting employment land / supporting job creation and opportunities for residents leading to enhanced mental and financial wellbeing.

Policy E2: Protected Industrial Land

Major Positive Effect:

- **Objective 10: Support and promote inclusive economic growth and boost employment.**

Likely Significant Effect: Major positive effect, with direct impact on business resilience and job creation across several areas in the Borough.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact by supporting sustainable freight movement and encouraging location-based freight efficiency.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: Safeguarding of SIL land for industrial purposes frees up land for housing outside of these areas. Co-location with residential allowed on LSIS.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely Effect: Efficient use of land. Industrial uses restricted outside of designated areas, with environmental benefits to communities from reduction in potential emissions and vehicle movements.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact; indirect link between protecting employment land / supporting job creation and opportunities for residents leading to enhanced mental and financial wellbeing.

Uncertain Effect:

- **Objective 6: Accelerate sustainable, climate-resilient development**

Mixed effect: Minor positive contribution to carbon reduction targets, through land optimisation, and supporting sustainable freight movement. Potential minor negative impact due to emissions from industrial processes and non-sustainable freight.

Policy E3: Non-Designated Employment Sites

Major Positive Effect:

- **Objective 10: Support and promote inclusive economic growth and boost employment.**

Likely Significant Effect: Major positive impact, in maintaining employment opportunities and preventing loss of business space to residential use. Encourages intensification and renewal and supports mixed-use development with retained employment capacity. Direct impact Borough wide.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive indirect impact as retaining employment in residential areas and supporting mixed-use development can reduce commuting.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Mixed effect: Redevelopment in certain circumstances of non-designated employment sites, where 50% affordable housing target required.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact, promotes mixed-use development which contributes to vibrant neighbourhoods and strengthens community resilience through local job retention.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact; indirect link between protecting employment land / supporting job creation and opportunities for residents leading to enhanced mental and financial wellbeing.

Policy E4: Delivering inclusive growth

Major Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely Significant Effect: Promotes social inclusion by enabling access to workspace for varied business types and supports community resilience through local economic empowerment. Strengthened community identity through local enterprise.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Affordable workspace provision within designated retail centres supports the diversification of commercial uses, which can enhance vibrancy and economic activity in town centres. Flexible workspace typologies can attract creative and cultural industries, contributing to the cultural offer and identity of high streets. Directing new business floorspace to town centres supports regeneration and footfall.

- **Objective 10: Support and promote inclusive economic growth and boost employment.**

Likely Significant Effect: Major positive impact through improved business resilience and retention, enhanced access to employment opportunities and encouraging modernisation of employment floorspace. Direct impact on large areas of the Borough.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact as locating business floorspace in town centres supports sustainable travel patterns.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: Minor positive impact through delivery and appropriate management of live/work units, providing an alternative housing solution.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact; indirect link between supporting business and job creation for local residents.

Policy E5: Local employment, skills and training

Major Positive Effect:

- **Objective 10: Support and promote inclusive economic growth and boost employment.**

Likely Significant Effect: Major positive impact, Borough wide with increased local employment and training opportunities through GLLaB and Employment and Skills Plans, strengthened local economy and business resilience via local supply chain engagement and infrastructure investment through developer contributions.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Significant Effect: Major positive impact on mental and financial wellbeing, with potential reduction in health inequalities linked to employment status. Policy improves wellbeing through access to secure employment and training and reduces inequalities by targeting local residents.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact; promotes social inclusion by targeting local residents for employment and training and can improve access to opportunities for disadvantaged groups, reducing social exclusion.

Policy E6: The visitor economy

Major Positive Effect:

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Significant Effect: Preservation of local heritage and identity through protection of pubs and arts and cultural uses and promotion of context-sensitive growth that respects historic townscape.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Promotes the revitalisation of town centres by encouraging cultural and visitor-related uses that enhance vibrancy, economic activity, and public realm quality. Strengthens cultural identity and night-time economy and supports infrastructure that makes centres more welcoming and accessible.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Arts and cultural uses and public houses encourage community participation and help build a stronger sense of belonging.

- **Objective 10: Support and promote inclusive economic growth and boost employment**

Likely Effect: Economic uplift in town centres and visitor hubs and job creation in cultural, hospitality, and retail sectors and indirectly in local supply chains. Encourages local economic resilience through visitor spending. Complements broader economic policies by recognising the role of tourism and culture in regeneration and employment.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Provision of public toilets, including provision for changing spaces in busy locations.

Town Centre Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
TC1 Supporting the network and hierarchy of centres	+	+	+	+	0	0	0	+	++	++	+
TC2 Managing edge –of-centre and out-of-centre uses	0	0	0	+	0	0	0	0	++	+	0
TC3 Culture and evening and night-time economy uses	0	+	0	+	0	0	0	0	++	++	+
TC4 Markets and events and pop-up space	0	+	0	+	0	0	0	0	++	+	+
TC5 Meanwhile uses	0	+	0	+	0	0	0	0	++	+	+
TC6 Hot food takeaways and gambling	0	+	0	+	0	0	0	0	+	0	++
TC7 Social and community infrastructure	0	+	0	++	0	0	0	0	+	0	+

Policy TC1: Supporting the Network and Hierarchy of Centres

Major Positive Effect:

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Major positive effect – supporting the network of town centres including the diversity, vitality and viability of the town centre network. A diverse mix of town centre uses are encouraged and weight given to enabling a vibrant daytime and nighttime economies, which will ensure these centres continue to grow, adapt and serve their communities. Positive effect on investment into town centres including public realm improvements, better connectivity, regeneration and community and cultural facilities and events.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Significant Effect: Promotes town centres as economic hubs and key locations for major retail, commercial, leisure, tourism and office activities. Seeks to diversify the mix of activities in town centres, including providing a positive impact on enabling daytime and nighttime economy provision within key centres. Positive impact on diversifying employment opportunities and supporting local businesses through encouraging affordable retail and start-up spaces to support local diversity and community needs, and supporting temporary ('meanwhile') uses of vacant/underutilised properties.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact on delivering a sustainable distribution of town centre facilities and services to support local communities across the borough and delivering 15-minute neighbourhoods. Intention being to meet the everyday needs of Royal Greenwich communities and to ensure residents can easily access facilities and services via foot, active transport or public transport, ensuring sustainable connections. The policy supports better pedestrian, cycling and public transport connections, and enables mixed-use development and residential uses within centres, which are well-served with key public transport hubs and stations, to enable enhanced connectivity for residents to key services, reducing reliance on private vehicles and potentially reducing commuting distances.

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact on enhancing public realm quality and investment and accessibility in town centre network across the borough. The policy promotes sustainable transport modes and active travel, supporting proposals that enhance each centre's unique character through public realm improvements, and better pedestrian, cycling, and public transport connections. Positive effect on social cohesion and communities within town centre network with a mix of community facilities, events and markets enabled, as well as supporting temporary meanwhile uses. It also requires that uses and development mitigate any potential adverse anti-social behaviour.

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: Minor positive impact by supporting residential uses within the borough's centres, encouraging mixed-use development to enable a greater supply of housing in centres, and promoting the conversion of underused upper floors for residential uses.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact on social cohesion and communities within town centre network with a mix of community facilities, events and markets enabled, as well as supporting temporary meanwhile uses. It also requires that uses and development mitigate any potential adverse anti-social behaviour.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact – supports proposals that enhance each centre's unique character and heritage. Promotes high-quality design across the network of centres. Promotes cultural uses and facilities.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Positive impact on mental and physical wellbeing through encouraging better active travel and public transport connections, public realm improvements and a greater diversity of uses in centres. Direct impact on quality of life, safety and health and wellbeing through supporting the establishment of community and cultural facilities in centre network across the borough, supporting affordable retail, pop-up events and outdoor activations, a thriving nighttime economy and mitigating any adverse impacts including on safety and anti-social behaviour.

Policy TC2: Managing edge-of-centre and out-of-centre uses

Major Positive Effect:

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Major positive effect on town centres by applying a town centres first approach, seeking to safeguard the vitality and viability of Royal Greenwich's town centres. Having a town centres first approach supports regeneration of centres and high streets and avoids harm to their function.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive effect in that centres are sought to be protected so that they can continue to provide both existing and new functions and services for local communities and that communities are not forced to go further afield for key services.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Effect: Minor positive effects in that it supports existing local businesses in centres and their function. The policy seeks to avoid out-of-centre and edge-of-centre town centre uses, particularly retail and leisure, from drawing expenditure away from existing businesses in town centres. Instead the policy seeks to enable continued investment in centres.

Policy TC3: Culture, Evening and Night-Time Economy Uses

Major Positive Effect:

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Major positive effect on supporting a vibrant and safe night-time economy across the borough's town centre network, particularly Woolwich Town Centre, Eltham Town Centre, Greenwich Town Centre, North Greenwich District Centre and Blackheath District Centre. This includes enabling a greater mix of uses and supporting businesses to extend opening hours and diversify their offer, particularly in hospitality, leisure, and cultural sectors. The policy encourages creative, cultural, and heritage offerings to attract visitors and support local businesses, including supporting existing and proposed cultural facilities, including music venues and pubs. This supports investment and infrastructure which will make the borough's centres more lively and attractive during the evening, bringing investment and more people into these centres.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Significant Effect: Major positive in that it will support and encourage economic growth and existing and new local businesses to operate within the borough's centres during evening and night-time hours, bringing a greater diversity of uses and offerings to centres, as well as increased employment opportunities. It will also benefit existing businesses who may be encouraged to open for extended hours. Supports the music and creative industries through supporting such venues and uses. Also, major positive effect in enabling meanwhile and pop-up uses in vacant or underused spaces which supports local entrepreneurs and start-ups.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Encourages activation of the public realm for events and community activities, as well as infrastructure investments to enhance the public realm – wayfinding, seating etc. Focus on enhancing the safety of the public realm for residents.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: The policy supports local community initiatives including providing spaces for local cultural organisations to curate high-quality evening programming that reflects the borough's diverse communities and enhances its cultural identity. Encourages the use of key public spaces for community gatherings, supported by appropriate lighting, seating, and wayfinding.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: The policy encourages working with partners to deliver community safety initiatives, including improved lighting and adherence to the Women's Night Safety Charter, to ensure the borough is welcoming and safe for all at night. Key focus on prioritising public safety, incorporating measures to prevent crime, and actively discouraging anti-social behaviour to contribute to a safe, attractive, and navigable public realm during night-time hour.

Policy TC4: Markets, events and pop-up spaces

Major Positive Effect:

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Major positive effect in that markets support the vitality and viability of town centres, offering a mixture of goods and services and also providing a positive contribution to the activation of the public realm. Markets, events and pop-up spaces support local business, local entrepreneurs as well as community initiatives. They can also enable a safe and vibrant night-time economy and venue spaces for cultural activities.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive effect in activating public realms, bringing greater footfall and investment in these spaces and public safety e.g. lighting, wayfinding, street furniture etc.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive in creating vibrant, inclusive and safe spaces for communities. This includes providing alternative goods and services provision as well as opportunities to showcase local community initiatives or local businesses.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Effect: Minor positive in that markets provide an opportunity to support local businesses and further employment. Also provides a greater diversification of commercial goods and services on offer.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive effect in creating vibrant, safe and attractive spaces for communities and greater activation of the public realm. Also, an opportunity to provide greater access to healthy foods and goods and services.

Policy TC5: Meanwhile uses

Major Positive Effect:

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Significant Effect: Major positive effect in that meanwhile uses of vacant or underused spaces support the vitality and viability of town centres, offering a mixture of goods and services and also providing a positive contribution to the activation of the public realm and streetscape. Meanwhile uses support local enterprise, start-ups, and the creative or cultural sectors, and provide interim employment, community, or leisure opportunities.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive effect in activating underused or vacant units and thus enhancing the associated public realm, bringing greater footfall and investment in these spaces, eyes on the street and public safety. Such uses can provide a positive contribution to placemaking of a street or area.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive contribution to ensuring vibrant, inclusive and safe spaces for communities through revitalising spaces. Such uses also provide opportunities to showcase local community initiatives or local businesses before a long-term use of the site comes into play.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely Effect: Minor positive in that meanwhile uses support local businesses and employment and can help to enhance the viability of areas. Also provides a greater diversification of commercial goods and services on offer.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive effect in revitalising vacant or underused spaces and increasing the safety and activation of spaces.

Policy TC6: Managing Hot Food Takeaways and Gambling Uses

Major positive effect

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Significant Effect: Major positive effect in improving the lives of residents and their mental and physical wellbeing by reducing the number and spread of hot food takeaway and gambling facilities within the town centre network. This has a borough wide effect. Positive health effects from reduced access to non-healthy foods, which will in turn reduce health inequities across the borough. Also improved community safety and wellbeing by reducing gambling venues and access and thus reducing the negative effects associated with gambling. This policy seeks to enhance the wellbeing of local communities – particularly children and vulnerable groups by controlling hot food takeaways and gambling venues.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive effect in enhancing the public realm by reducing the number of hot food takeaway and gambling facilities and thus reducing any potential for future activities to cluster. In turn reducing adverse effects which include waste, delivery driver scooters, bikes etc. taking up the footpath and disorderly behaviour from gambling, and thus enhancing safety, attractiveness and accessibility of the public realm.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive contribution to ensuring vibrant, safe and sustainable centres for communities by reducing hot food takeaway and gambling venue facilities. This will reduce inequalities across the borough and increase safety and public health outcomes, whilst promoting healthier lifestyles.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive effect enabling more vibrant and prosperous town centres through reducing hot food takeaway and gambling venue provision in the town centre network. Restricting such uses will help to revitalise town centres and shopping parades and provide a greater diversity of uses within centres. Positive effect in supporting the vitality, character and function of town centres and safeguarding the amenity and wellbeing of communities.

Policy TC7: Social and community infrastructure

Major Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely Significant Effect: Major positive effect on supporting the provision of social and community infrastructure across the borough to meet the needs of current and future generations. The policy supports the development of neighborhoods and access to social and community facilities, which in turn will enhance social inclusion and reduce inequalities across the Royal Borough.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive effect in that social and community infrastructure can include enhancements to the existing public realm or new public realm provision.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive effect of supporting social and community infrastructure is that such investments will support the regeneration and vitality of town centres.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive effect in supporting social and community infrastructure investment will help to reduce inequalities of access to such infrastructure across the borough.

Design and Heritage Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
DH1 Principles for High Quality Urban Design	+	+	++	+	+	++	++	+	0	0	+
DH2 Tall Buildings	0	+	++	+	0	+	?	+	+	0	0
DH3 Public Realm	0	++	0	+	+	0	+	+	+	0	++
DH4 Heritage Assets	0	+	0	0	+	0	0	++	0	0	0
DH5 Maritime Greenwich World Heritage Site	0	+	-	0	+	0	0	++	0	0	0
DH6 Strategic and Local Views	0	+	0	0	+	0	0	+	0	0	0
DH7 Shopfronts, advertisements and signage	0	+	0	0	0	0	0	+	+	0	0
DH8 Thames Policy Area	+	+	0	0	+	0	+	+	0	0	+

Policy DH1: Principles for High Quality Urban Design

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive effect in supporting the increased supply of safe, sustainable and well-designed housing across the borough, with the policy encouraging development to promote contextually appropriate intensification and optimising density through a design-led approach. Support provided for mixed-use and higher density development where it accords with local character, infrastructure capacity and sustainability objectives, maximising density whilst ensuring sites are not overdeveloped.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely Significant Effect: Major positive impact in that development across the borough is required to be designed to support long-term resilience and climate adaptation with regards to high standards of sustainable construction and design and improving energy efficiency and climate adaptation measures. This includes incorporating energy-efficient strategies including passive solar gain, thermal performance and sustainable materials and incorporating climate-responsive façades.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely Significant Effect: Major positive impact on seeking that development is designed to support long-term environmental resilience and resource efficiency by requiring development to demonstrate responsible water management and mitigation of surface water flood risk, and to provide dedicated facilities for waste reduction, recycling and storage. In addition, the policy encourages efficient use of land, optimising density through a design-led approach where it accords with infrastructure capacity, sustainability objectives and ensuring sites are not overdeveloped.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive effect encouraging active travel and improved connectivity through seeking to ensure development incorporates inclusive and accessible design for all users including walkable environments, active travel infrastructure, and promoting coherent and permeable street layouts that promote wayfinding and connectivity.

Assumptions/Uncertainties: Assumption that increased active travel infrastructure and improved connectivity will lead to increased level of active travel and reduce reliance on private vehicles.

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive effect re creating attractive, safe and well-designed public realm environments. Development required to create attractive, functional and well-managed spaces with public realm engagement and positive pedestrian experiences. Requirement to make safe and welcoming public spaces, whilst encouraging active transport and walkable environments.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive effect on requiring development to create attractive, functional and well-managed private and public/community spaces, with a focus on safe and welcoming spaces, inclusive access, provision of high quality amenity spaces including informal and formal play areas, outdoor seating etc. Significant focus on maximising natural surveillance and enhanced public realm safety, as well as delivering legible, accessible and high-quality development.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive effect in seeking that development be designed to increase the provision of urban greening and ecology, including by integrating greening, tree planting, living roofs and walls, as well as soft landscaping. Development is also required to reinforce and enhance existing local character and distinctiveness through site specific solutions, having regard to natural features such as topography, waterways, landscapes and vegetation, thus seeking to maintain and enhance existing open space.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Positive effect in requiring development to reflect and respect the exceptional heritage, character and identity of Royal Greenwich's diverse neighbourhoods, and contribute positively to the built environment and the borough's identity through high quality design. Development is required to enhance local character and distinctiveness through site-specific design solutions, having regard to the setting, scale and heritage value of existing buildings and spaces, townscape elements, local landmarks, skyline features, and views. Development must respond appropriately to this surrounding context, with higher-density development needing to accord with local character.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive effect in development is required to support health and wellbeing through walkable environments and active travel infrastructure, enhance public realm safety and positive pedestrian experiences. Policy focus on creating attractive, functional and safe spaces for communities which applies across the borough.

Policy DH2: Tall Buildings

Major Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Significant Effect: Major positive impact of increasing urban density and housing supply including affordable housing supply and mix of housing typologies. Supports the provision of tall buildings and increased urban density and housing supply within the appropriate locations set out in the policy.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact of seeking that publicly accessible open space at ground floor is maximised and that developments including tall buildings deliver outdoor amenity spaces, play areas and public realms that are attractive, inclusive, and useable. Policy also seeks that permeability and legibility are provided across the site, a human scale of development at street level is provided and that developments do not adversely affect existing spaces. The policy also supports creating shared facilities at the ground floor level to encourage social cohesion.

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact is that the policy promotes creating shared facilities for social cohesion and ensuring the provision of public spaces for a range of users which are accessible, inclusive and safe. The policy also seeks that developments demonstrate careful distribution of different types of homes across tall buildings, providing for a range of requirements including for families.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely Effect: Minor positive impact in that developments are required to maximise proposed buildings' energy and resource efficiency and resource efficiency to deliver the highest standards of sustainable design and construction.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact in that tall buildings have been enabled within tall building zones and opportunity areas with the purpose of having the least impact on heritage assets within the borough. These zones and areas contain the least amount of heritage assets within the borough and as such are more appropriate areas to concentrate tall buildings. The

policy also requires that proposals demonstrate that the development respects and positively relates to the immediate and wider surrounding landscape character, skyline, townscape, streetscape and built form, including conserving and enhancing heritage assets and protecting the Outstanding Universal Value of the Maritime Greenwich World Heritage Site if applicable.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive impact in that tall buildings will increase urban density and result in more people living and working in centres through provision of apartments and offices. This will help support the centre's daytime and night-time economies, increase footfall, safety, and expenditure in these centres as well as vitality and viability.

Uncertain impacts:

- **Objective 7: Improve environmental resilience and resource efficiency**

Mixed effect: The policy will enable efficient use of land and will require sustainable built outcomes regarding flood risk, waste etc. In addition, it requires developments to demonstrate that they will not adversely impact on the microclimate and amenity of the application site, adjoining sites, public/private spaces and surrounding streets. However, tall buildings by nature create micro-climate impacts including impacts on sunlight and daylight access, adverse wind effects which need to be tested, mitigated and managed.

Policy DH3: Public Realm

Major Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Significant Effect: Major positive impact in significantly enhancing public realm design and outcomes across the borough, showing the Council's commitment to shaping a public realm that is welcoming, inclusive, accessible and resilient and seeking that all development contributes to a high-quality public realm environment. Requires all development to uphold a high-standard of public realm design focused on design excellence, safety and accessibility of streets and public spaces which support social interaction and inclusivity for all residents and visitors. Utilises the Healthy Streets approach to require development to put people at the centre of street design, whilst encouraging walking and cycling, and sustainable design.

- **Objective 11: Health and wellbeing**

Likely Significant Effect: Major positive impact in promoting healthy streets approach, placing people at the centre of street design and encourages walking and cycling, fundamental to mental and physical wellbeing of local communities. The policy also promotes safe, inclusive and vibrant public realm, which includes seeking to improve the safety and perception of safety for pedestrians and users, and delivering spaces that support social interaction.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely Effect: Minor positive effect on requiring development to contribute to a high-quality environment that strengthens community ties and reflects the Borough's distinctive identity. New public realm should support social interaction and community use .

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive impact in seeking that development proposals incorporate soft landscaping, tree planting, and green infrastructure into public realm design, as well as incorporating the existing topography and microclimate in proposed designs.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely Effect: Minor positive impact in seeking that development incorporate environment resilience design measures including sustainable drainage and mitigation of heat and wind, as well as selecting sustainable built materials.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive effect in requiring all development proposals to enhance and complement the borough's existing character, heritage, and landscape through thoughtful placemaking. Another minor positive is enabling high-quality public realm designs to positively contribute to the borough's identity and distinctiveness.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive effect in enabling public realm enhancements within the borough's town centres, improving residents and visitor experiences within these centres and spaces.

Policy DH4: Heritage Assets

Major Positive Effect:

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Significant Effect: Major positive impact on sustaining and enhancing Royal Greenwich's built environment and townscape, ensuring new development respects and preserves existing heritage assets, whilst supporting positive placemaking that highlights the borough's rich history. The policy requires conservation and where possible enhancement of the borough's diverse heritage assets, maintaining their significance, including distinctive character and setting, and ensuring the historic environment's positive role in placemaking, public realm and economy is enhanced.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact in that the policy seeks that the public's enjoyment of, access to and awareness of the borough's heritage will be promoted which includes heritage assets and their settings including the public realm. Development is required to deliver high quality new buildings and spaces which enhance the historic environment's positive role in placemaking and the public realm.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive effect in that the policy requires developments to preserve and where possible enhance Royal Greenwich's registered historic parks and gardens. This includes safeguarding and conserving their special historic interest, integrity, special character or appearance of the park or garden, protecting their settings and views. This includes protecting their public access.

Policy DH5: Maritime Greenwich World Heritage Site

Major Positive Effect:

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Significant Effect: Major positive impact on sustaining and enhancing the Borough's culture and built heritage through protection, conservation and enhancement of the Outstanding Universal Value, architectural and historical significance, authenticity, and integrity of the Maritime Greenwich World Heritage Site. The policy also manages the setting (buffer zone)

of the World Heritage Site to support and enhance its values. Policy provides clear development requirements and outcomes to avoid any adverse impacts.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact of promoting improved public access to the site and promoting the use, management and interpretation of the site in ways that protect, enhance and better communicate its Outstanding Universal Value. Continued maintenance and preservation of public realm within the World Heritage Site and Buffer Zone.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive impact of preserving and enhancing existing parks and green spaces within the World Heritage Site and Buffer Zone.

Minor Negative Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely Effect: Minor negative effect on housing supply within the World Heritage Site Buffer Zone restricting potential scale and form of development to avoid adverse impacts on Outstanding Universal Values and views of the World Heritage Site.

Policy DH6: Strategic and Local Views

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impacts on managing or enhancing visual connections between the public realm, water and open spaces and enhancing the experience of local views and viewer's ability to recognise and appreciate landmarks, have improved access to viewing locations, landscaping and interpretation, and sensitive public realm improvements.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive impact on managing or enhancing visual connections between the public realm, water and open spaces, as well as improving access to viewing platforms in open spaces and interpretation of these views.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact in managing designated views of strategically important landmarks, as well as managing and where possible enhancing significant local views that contribute to the borough's character, heritage, and sense of place. This includes securing appropriate setting of and backdrop to the Maritime Greenwich World Heritage Site. The policy seeks that development should mitigate any harmful impacts on visual connections between heritage assets and their landscape or urban context. In addition, proposals within conservation areas are required to preserve or enhance settings.

Policy DH7: Shopfronts, advertisements and signage

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact is that the policy requires high-quality shopfronts, advertisements, and signage that positively contribute to the character, appearance and safety of the public realm. This includes encouraging passive surveillance, providing design that considers shade and microclimate, reducing clutter and adverse lighting impacts.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact in that the policy requires advertisement and signage proposals to avoid harm upon the significance of heritage assets or their settings, avoiding obscuring important architectural features and careful consideration given to placement.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive impact in that the policy supports high-quality shopfronts, advertisements, and signage that positively contribute to the character, appearance, safety and vitality of town centres and neighbourhood parades.

Policy DH8: Thames Policy Area

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely Effect: Minor positive impact in that the policy supports sustainable transport, including river passenger services and freight movement, and providing or enhancing continuous, safe, and accessible public access along the Thames Path and riverside walkways. This includes the completion and maintenance of a continuous public riverside footpath and cycleway.

- **Objective 2: Enhance the public realm**

Likely Effect: Minor positive impact in that the policy promotes high-quality design and townscape outcomes including, requiring developments to delivery exemplary public realm that respects the river's character and setting, maximises opportunities for public realm improvements and increased permeability. The policy also encourages the development of vacant or underutilised land and improved public access and connectivity to the river.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely Effect: Minor positive impact in that the policy promotes maximising opportunities for public open space along the riverfront, greater access to the Thames and improving and integrating with wider green and blue infrastructure networks, including the Green Chain Walk and Thames Path National Trail.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely Effect: Minor positive impact in that policies seeks to ensure environmental resilience and biodiversity, including incorporating flood risk mitigation and climate adaptation measures in line with the Thames Estuary 2100 Plan, including protecting the integrity of existing flood defences to minimise flood risk. It also seeks to enhance biodiversity and ecological value through green infrastructure, habitat creation, wildlife and nature conservation, and sustainable drainage systems. It also requires temporary or permanent mooring proposals to not unduly impact on the river and its foreshore including through ecological disruption, pollution, not compromising flood defences, nor habitats.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely Effect: Minor positive impact in that the policies requires developments to respect heritage and local character including conserving and enhancing the character of historic riverfront areas such as Greenwich, Deptford Creek, and Woolwich Arsenal, and ensuring development responds sensitively to the borough's maritime and industrial heritage. In addition, it seeks that development and use of moorings do not compromise views of the river, the World Heritage Site and other heritage assets and their settings. Development is required to positively contribute via exemplary architecture to the character, setting and public realm of the riverside.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely Effect: Minor positive impact of improving mental and physical wellbeing of visitors and residents by providing or enhancing continuous, safe, and accessible public access along the Thames Path and riverside walkways, including the completion and maintenance of a continuous public riverside footpath and cycleway. It also promotes inclusive riverfront uses and access for all users.

Environment Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
EN1 Green and Blue Infrastructure	0	+	0	+	+	+	++	0	0	0	+
EN2 Open Space	0	+	0	+	++	+	+	0	0	0	+
EN3 Biodiversity	0	0	0	+	++	+	++	0	0	0	+
EN4 Air quality	0	0	0	0	0	+	++	0	0	0	++
EN5 Local Environmental Impacts	0	0	0	0	0	0	++	0	0	0	++
EN6 Flood risk and sustainable drainage	0	0	0	0	0	++	++	0	0	0	+
EN7 Strategic Waste Management	+	0	0	0	0	0	++	0	0	0	0

Policy EN1: Green and Blue Infrastructure

Major Positive Effect:

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: Through the promotion of new green and blue infrastructure on development sites, and the protection of existing key green and blue infrastructure features in the Royal Borough, the policy will play a significant role in managing flood risk, in particular through sustainable urban drainage systems. It will also improve air and water quality through promoting new tree planting and ensuring the protection of existing trees, as well as supporting new biodiversity, ecology and habitat gain on development sites, and protecting existing habitats and species. Through encouraging all development to provide new urban planting on public realm, the policy aims to spread these benefits to all communities where development takes place within the Royal Borough.

Minor Positive Effect:

- **Objective 2: Enhance the public realm**

Likely effect: Through the promotion of new urban planting within new or existing public realm for new developments, the policy will improve the design, character and identity of public realm spaces, therefore creating a sense of belonging for residents and encouraging active travel and social interaction.

- **Objective 4: Build resilient and inclusive communities**

Likely effect: The policy will improve the safety and resilience of local residents and the Royal Borough as a whole to environmental challenges in the form of potential flooding, heatwaves, and biodiversity loss through the promotion of green infrastructure features which help to safeguard against environmental externalities. This is particularly significant in terms of climate change which has the potential to significantly impact on communities and habitats. To some extent, the policy could also reduce health inequalities because green infrastructure can improve residents' and possibly wider communities' mental and physical health.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely effect: This policy will protect and enhance biodiversity and ecology, for example through protecting green links and footpaths, food growing spaces/allotments and trees, and encouraging new food growing spaces/allotments and trees where

possible and appropriate. It will also promote urban greening through tree planting and landscaping, in particular on major sites but generally through promoting the use of green and blue infrastructure on all sites in the public realm, and major development sites on site as well as within the public realm.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: This policy is supportive of climate adaptation measures and reductions in carbon emissions since through promoting new planting, carbon uptake by plants will increase. Encouraging developers to plant trees and utilise sustainable drainage systems provides some protection against the urban heat island effect, flooding and habitat degradation, contributing to climate resilience.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: The promotion of new urban planting will improve the design, character and identity of public realm spaces, therefore creating a sense of belonging for residents and encouraging active travel and social interaction. To some extent, the policy could also reduce health inequalities because green infrastructure can improve residents' and possibly wider communities' mental and physical health.

Policy EN2: Open Space

Major Positive Effect:

- **Objective 5: Respect the Royal Borough's open spaces**

Likely significant effect: Through the protection and enhancement of both designated and non-designated open spaces, the policy promotes the creation of high-quality, accessible, and multifunctional open spaces through development, supports biodiversity and climate resilience, and prioritises the re-provision and improvement of open space in regeneration schemes, thereby conserving and enhancing open spaces for community needs, active lifestyles, and social cohesion.

Minor Positive Effect:

- **Objective 2 Enhance the public realm**

Likely effect: By requiring new or improved public open spaces to be delivered as part of major developments, particularly in areas of open space deficiency, this policy enhances accessibility and usability of public spaces. The policy also supports

improvements such as seating, walking routes, and play infrastructure, which contribute to safer, more inclusive and multifunctional environments that encourage active travel and social interaction.

- **Objective 4: Build resilient and inclusive communities**

Likely effect: The policy safeguards open spaces so that they can be preserved, improved, and continue supporting community wellbeing, recreation, and social connection. Through provisions that encourage inclusive design, improved accessibility for disabled users, and secured public access to privately owned open spaces, the policy helps ensure that open spaces are welcoming and usable for a wider range of residents, contributing to more equitable and connected neighbourhoods.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: Open spaces are protected and they can contribute to natural flood mitigation, urban cooling, and biodiversity.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: Open spaces are protected and they can support natural drainage, improve air and water quality, and contribute to biodiversity. By encouraging enhancements to the environmental value of open spaces, such as planting beds, green corridors, and multifunctional spaces, the policy helps deliver localised improvements to ecology and contributes to more sustainable land use and environmental management.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: the policy would have a minor positive impact on health and wellbeing by supporting the provision of accessible, high-quality open spaces that encourage physical activity, social interaction, and stress reduction, such as through walking routes, play infrastructure, and seating. By promoting inclusive design and public access to open spaces, including improvements for wheelchair users and people with physical disabilities, the policy contributes to creating safer, more attractive environments that support mental and physical wellbeing across local communities.

Policy EN3: Biodiversity

Major Positive Effect:

- **Objective 5: Respect the Royal Borough's open spaces**

Likely significant effect: By mandating biodiversity improvements in the borough, the policy would improve biodiversity in the borough and promote urban greening. The policy also protects Sites of Importance for Nature Conservation, ancient woodland and other sensitive habitats by requiring developments adjacent to such sites to demonstrate how they will avoid harming them.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: The policy will have a major positive effect on the environment as it will support the enhancement of biodiversity, ecology and habitats in the borough by asking for developments to maximise biodiversity net gain and prioritise on-site delivery.

Minor positive effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: The policy will have a minor positive effect by supporting the reduction of climate emissions by preserving and enhancing natural environments which absorb carbon from the air.

Policy EN4 Air quality

Major Positive Effect:

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: major positive impact on improving air quality by requiring development to reach Air Quality Neutral standard and not cause harm to air quality, and Air Quality Positive for major developments in Opportunity Areas.

Objective 11: Improve the quality of life, safety and health and wellbeing of communities

Likely significant effect: major positive impact on reducing residents' exposure to poor air quality, addressing a public health concern by requiring developments to deliver improvement measures onsite.

Minor Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: positive effect on promoting sustainable design and reducing the emission of pollutants that intensify climate change.

Policy EN5 Local environmental impacts

Major Positive Effect:

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: major positive impact on avoiding harm to the urban and natural environment through managing pollution impacts and requiring developments to include mitigation measures.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely significant effect: major positive impact on reducing residents' exposure to light pollution, noise pollution, odour and land contamination. Improving occupants' quality of life and ensuring developments do not harm mental and physical wellbeing.

Policy EN6 Flood risk and sustainable drainage

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact by promoting sustainable drainage systems in development sites to improve resilience and minimise damage in times of flood.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: major positive impact on managing and mitigating flood risks and protecting the safety of occupants in development sites.

Minor Positive Effect:

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: positive effect on ensuring vulnerable uses are in areas at lowest risk of flooding, thus reducing damage and danger to life and property.

Policy EN7 Strategic Waste Management

Major Positive Effect:

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: the safeguarding of waste sites will support recycling and the circular economy. Proposals for new waste sites must consider the waste hierarchy and proximity principle and opportunities for energy recovery from any waste materials should be explored, contributing to environmental resilience.

Minor Positive Effect:

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely effect: positive effect in reducing the transportation of waste by contributing to London's self-sufficiency in handling waste and ensuring that there are sufficient waste facilities within the SE London sub-region. Where waste is transported, the policy prioritises movement by rail and river.

Climate Emergency Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
CE1 Climate Resilient and Net Zero Design Principles	0	0	+	0	+	++	+	0	0	0	+
CE2 Operational carbon and energy balance	0	0	+	+	0	++	+	0	0	0	+
CE3 Decentralised Energy	0	0	0	+	0	++	+	0	0	0	0
CE4 Whole Life Carbon and Circular Economy	0	0	0	+	0	++	++	0	0	0	0
CE5 Retrofitting and existing buildings	0	0	0	+	0	++	+	++	+	0	0

Policy CE1 Climate Resilient and Net Zero Design Principles

Major Positive Effect:

- **Objective 6 Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on promoting high standards of sustainable construction and design, including requiring BREEAM standards and climate resilient design, linking advice to the Climate Resilience SPD. Climate adaptation measures and the GLA energy hierarchy is followed, encouraging carbon reduction across the whole Royal Borough.

Minor Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: minor positive impact on ensuring housing developments are sustainable and climate resilient, standards of sustainable design ensure developments have low carbon footprint and use less energy.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely effect: minor positive impact on promoting urban greening as a climate resilient design principle to enhance open spaces and landscaping space, control temperature and tackle air pollution, supporting advice in the Climate Resilience SPD.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: minor positive impact on encouraging sustainable building design, by requiring developments to not exceed mains water consumption targets and to meet BREEAM standards.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: minor positive impact on improving physical wellbeing by introducing climate resilient and green environments to development sites across Royal Greenwich. Better physical environment brings about better thermal comfort and reduced emissions lead to long term health benefits.

Policy CE2 Operational carbon and energy balance

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on ensuring high energy efficiency in buildings by requiring a new approach of minimising energy use intensity and maximising renewable energy generation and offsetting any shortfall between the energy consumption and generation.

Minor Positive Effect:

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: minor positive impact on ensuring new housing units are energy efficient and have low energy demand for heating due to better fabric efficiency.

- **Objective 4: Build resilient and inclusive communities**

Likely effect: minor positive impact on improving energy security of households in the long term due to local supply of cheaper and greener heat and electricity.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: minor positive impact on saving energy across all land use types and avoiding pollutants from using fossil fuels in buildings on-site, improving local air quality.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: minor positive impact on creating indoor environments that have good thermal efficiency and comfort for occupants, reducing health risk from extreme heat or cold, and from pollutants that would have been emitted from on-site burning of fossil fuels.

Policy CE3 Decentralised energy

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on encouraging low carbon energy supply and reducing reliance on grid energy, supporting large scale developments to create low carbon energy centres and heat networks to supply local communities.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely effect: minor positive impact on improving energy security of households due to better energy efficiency and fabric efficiency, reducing energy bills and assisting with resilience against cost of energy challenges.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: minor positive impact on requiring developments to supply and use energy efficiently with the most viable and sustainable energy option, improving energy efficiency across development sites in the borough.

Policy CE4 Whole Life Carbon and Circular Economy

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on reducing embodied carbon which attributes significantly to the emissions of the building, helping to reach net zero targets.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely significant effect: major positive impact on requiring developments to adopt circular economy principles in building design, including reduction of waste and maximising reuse of materials.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely effect: minor positive impact on encouraging developments to source local reclaimed materials and promote low-carbon design and reduce reliance on imported materials.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: minor positive impact on re-using existing floorspace with improved energy efficiency, material efficiency, and adaptive reuse.

Policy CE5 Retrofitting and existing buildings

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on supporting existing buildings across the Royal Borough in retrofitting and climate adaptation, improving energy efficiency and building lifespan.

- **Objective 8: Sustain and enhance the Royal Borough's culture and built heritage**

Likely effect: major positive impact on preserving historic and architectural significance of heritage assets by giving priority to protection of character and appearance of historic buildings in retrofitting and require demolitions to be fully justified. This helps to safeguard heritage assets for adaptive re-use that have higher levels of energy efficiency.

Minor Positive Effect:

- **Objective 4: Build resilient and inclusive communities**

Likely effect: minor positive impact on retaining and improving local landmarks where communities meet, contributing to maintaining social cohesion and local identity and continuing to offer places for communities to gather.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: minor positive impact on re-using existing floorspace with improved energy efficiency and reducing construction waste.

- **Objective 9: Revitalise town centres, high streets and cultural assets**

Likely Effect: Minor positive impact in that the policy supports sustainable retrofitting that is sensitive to the fabric of existing buildings, protecting the character of high streets and cultural assets.

Transport Policies

Policy	Sustainability Objectives										
	1 Sustainable Transport and Connectivity	2 Public Realm	3 Housing	4 Communities	5 Open spaces	6 Climate Resilience	7 Environment	8 Heritage	9 Town Centres and Culture	10 Economic Growth and Employment	11 Health and wellbeing
T1 Active travel and cycle parking	++	++	0	+	+	+	+	0	0	0	++
T2 Car Parking	++	?	0	0	0	+	+	0	0	0	0
T3 Roads and streets	++	++	0	+	+	+	+	0	0	0	+
T4 Public transport improvements	++	0	+	0	0	+	0	0	+	0	0
T5 Freight Movement	+	0	0	0	0	+	0	0	0	+	0
T6 Parking standards for disabled people and the physically impaired	?	0	0	+	0	0	-	0	0	0	+

Policy T1: Active travel and cycle parking

Major positive effect

- **Objective 1: Encourage sustainable transport and enhance connectivity**
Likely significant effect: Major positive impact by enabling more people to walk and cycle. This will reduce reliance on private vehicles and improve connectivity between homes, jobs, services and green spaces.
- **Objective 2: Enhance the public realm**
Likely significant effect: Major positive impact as the policy promotes making walking routes more comfortable, less cluttered, safe and well-lit. Encouraging active travel also improves public realm.
- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**
Likely significant effect: Major positive impact as active travel is one of the most significant ways of improving health and wellbeing, including mental health.

Minor positive effect

- **Objective 4: Build resilient and inclusive communities**
Likely effect: Minor positive impact as the policy will improve safety in cycling and walking routes.
- **Objective 5: Respect the Royal Borough's open spaces**
Likely effect: minor positive impact by increasing accessibility of open spaces by active travel, and enhancing the Green Chain.
- **Objective 6: Accelerate sustainable, climate resilient development**
Likely effect: minor positive impact by supporting the reduction of carbon emissions.
- **Objective 7: Improve environmental resilience and resource efficiency**
Likely effect: minor positive impact by improving air quality through promoting mode shift to active travel.

Policy T2: Car Parking

Major positive effect

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely effect: restricting parking in new developments will greatly reduce reliance on private vehicles and promoting low carbon ways of travel.

Minor positive effect

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: minor positive impact as restricting parking will reduce use of private vehicles contributing to the reduction of carbon emissions.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: Minor positive impact as reducing parking provision encourages efficient use of land.

Uncertain effect

- **Objective 2: Enhance the public realm**

Mixed effect: Restricting the provision of off-street parking could create a more pleasant and welcoming public realm by ensuring that developments are not dominated by car parking. However, there is a possibility that reducing provision of parking could lead to more illegal parking including for example in pedestrian areas and pavements, which would have a detrimental impact on public realm.

Policy T3: Roads and streets

Major positive effect

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely significant effect: making streets more pleasant, green and safe for pedestrians and cyclists will encourage active travel. Reducing through-traffic, delivering segregated cycle lanes, and reallocating kerbside space from parking will discourage private car travel.

- **Objective 2: Enhance the public realm**

Likely significant effect: major positive impact on public realm, improving design, safety and accessibility, reallocating kerbside, seeking to encourage active travel and social interactions.

Minor positive effect

- **Objective 4: Build resilient and inclusive communities**

Likely effect: minor positive impact by improving community resilience to environmental and social challenges through people-friendly streets and green infrastructure.

- **Objective 5: Respect the Royal Borough's open spaces**

Likely effect: minor positive impact through the policy's promotion of urban greening.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: minor positive impact through supporting the reduction of carbon emissions through the promotion of active travel.

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: minor positive impact on reducing flood risk through urban greening and sustainable drainage solutions.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: minor positive impact. Safer streets should improve physical wellbeing. Better environments for walking and cycling should lead to more active travel which will improve residents' health.

Policy T4: Public transport improvements

Major positive impacts

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely significant effect: major positive impact by supporting enhanced access to public transport as well as improvement, upkeep and expansion of public transport services. This will encourage travel by public transport and enhance connectivity.

Minor positive impacts

- **Objective 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: positive impact on the delivery of new homes at greater densities in areas with good and improved public transport accessibility.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: minor positive impact by supporting the reduction of carbon emissions through modal shift towards public transport from driving.

- **Objective 9 Revitalise town centres, high streets and cultural assets**

Likely effect: minor positive contribution, public transport improvements and the subsequent reduction in the dominance of the car will create more pedestrian friendly environments in town centres.

Policy T5: Freight movement

Minor positive impacts

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Likely effect: minor positive impact by improving sustainable freight efficiency through encouraging sustainable and efficient ways of delivering goods including consolidation, electric vehicles and cargo bikes.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: minor positive impact by supporting the reduction of carbon emissions through sustainable freight.

- **Objective 10: Support and promote inclusive economic growth and boost employment opportunities**

Likely effect: Minor positive impact by safeguarding the Aggregates Zone and safeguarded wharves for employment purposes.

Policy T6: Parking standards for disabled people and the physically impaired

Minor positive impact

- **Objective 4: Build resilient and inclusive communities**

Likely effect: minor positive impact as ensuring blue badge parking is available will promote social inclusion of people with mobility issues by helping them travel more easily.

- **Objective 11: Improve the quality of life, safety and health and wellbeing of communities**

Likely effect: minor positive impact by improving mental and physical wellbeing for people with mobility issues.

Minor negative impact

- **Objective 7: Improve environmental resilience and resource efficiency**

Likely effect: Minor negative impact through increasing carbon emissions by enabling more people to drive private vehicles.

Uncertain impact

- **Objective 1: Encourage sustainable transport and enhance connectivity**

Mixed effect: The policy will enhance connectivity by making parking and hence driving available for people who face barriers using other modes of transportation. However, as a consequence it encourages the use of private motor vehicles.

Cumulative effects of the Local Plan policies

Policy	Sustainability Objectives										
	1	2	3	4	5	6	7	8	9	10	11
P1	+	+	++	0	+	0	+	++	++	+	+
P2	+	0	++	+	+	0	0	+	+	++	+
P3	++	+	++	++	+	0	0	+	+	++	+
P4	+	+	++	++	0	0	0	++	++	+	+
P5	++	+	++	+	+	0	0	+	++	+	+
P6	+	0	+	0	0	0	0	+	+	0	0
P7	0	+	+	+	0	0	0	+	+	0	+
P8	0	+	+	0	+	0	0	+	+	0	0
H1	+	0	++	+	0	0	0	0	+	0	++
H2	0	0	++	++	0	0	0	0	0	0	++
H3	0	0	++	++	0	0	0	0	0	0	++
H4	+	0	++	+	+	0	0	0	+	0	++
H5	+	0	++	+	+	0	0	0	+	0	+
H6	+	0	++	+	+	0	0	0	+	0	+
H7	+	0	+	+	0	0	0	+	0	0	+
H8	0	0	+	+	0	0	0	0	0	0	++
H9	0	0	++	0	0	0	+	+	0	0	++
H10	0	0	++	+	0	0	0	0	0	0	++
H11	0	0	+	+	0	+	+	0	0	0	++
E1	+	0	0	+	0	0	0	0	0	++	+
E2	+	0	+	0	0	?	+	0	0	++	+
E3	+	0	+	+	0	0	0	0	0	++	+
E4	+	0	+	++	0	0	0	0	++	++	+
E5	0	0	0	+	0	0	0	0	0	++	++
E6	0	0	0	+	0	0	0	++	++	+	+
TC1	+	+	+	+	0	0	0	+	++	++	+
TC2	0	0	0	+	0	0	0	0	++	+	0
TC3	0	+	0	+	0	0	0	0	++	++	+
TC4	0	+	0	+	0	0	0	0	++	+	+
TC5	0	+	0	+	0	0	0	0	++	+	+
TC6	0	+	0	+	0	0	0	0	+	0	++
TC7	0	+	0	++	0	0	0	0	+	0	+
DH1	+	+	++	+	+	++	++	+	0	0	+
DH2	0	+	++	+	0	+	?	+	+	0	0
DH3	0	++	0	+	+	0	+	+	+	0	++
DH4	0	+	0	0	+	0	0	++	0	0	0
DH5	0	+	-	0	+	0	0	++	0	0	0
DH6	0	+	0	0	+	0	0	+	0	0	0
DH7	0	+	0	0	0	0	0	+	+	0	0
DH8	+	+	0	+	+	+	+	+	+	+	+
EN1	0	+	0	+	+	+	++	0	0	0	+
EN2	0	0	0	+	++	+	+	0	0	0	+
EN3	0	0	0	0	++	+	++	0	0	0	0
EN4	0	0	0	0	0	+	++	0	0	0	++
EN5	0	0	0	0	0	0	++	0	0	0	++
EN6	0	0	0	0	0	++	++	0	0	0	+
EN7	+	0	0	0	0	0	++	0	0	0	0
CE1	0	0	+	0	+	++	+	0	0	0	+
CE2	0	0	+	+	0	++	+	0	0	0	+
CE3	0	0	0	+	0	++	+	0	0	0	0
CE4	0	0	0	+	0	++	++	0	0	0	0
CE5	0	0	0	+	0	++	+	++	+	0	0
T1	++	++	0	+	+	+	+	0	0	0	++
T2	++	?	0	0	0	+	+	0	0	0	0
T3	++	++	0	+	+	+	+	0	0	0	+
T4	++	0	+	0	0	+	0	0	0	0	0
T5	+	0	0	0	0	+	0	0	0	+	0
T6	?	0	0	+	0	0	-	0	0	0	+

Appendix 3: Habitats Regulations Assessment Screening

Appendix 3

Habitats Regulations

Assessment:

Screening Report

Royal Greenwich is preparing a new Local Plan 2022-2037. Under the Conservation of Habitats and Species Regulations 2017, we are required to conduct a Habitats Regulations Assessment (HRA) to test if the Local Plan could significantly harm the designated features of a European site.

This assessment considers the impact of proposed development on sites designated under the European Directive (92/43/EEC The Habitats Directive).

Executive summary

Royal Greenwich has a legal requirement to identify and mitigate against any aspects of planning policy which could have a significant negative effect on European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or other sites which are protected by government policy (proposed SACs or SPAs, Ramsar sites or proposed Ramsar sites, or areas secured as sites compensating for damage to a European site).

As there are no European or Ramsar sites within Royal Greenwich, the exercise has been carried out on sites located partially or fully within 15km of the borough's boundary. Epping Forest is designated a SAC. Its location 9km from Royal Greenwich, physical separation offered by the River Thames and lack of direct transport routes between the two areas, and the Local Plan's focus on reducing emissions from transport means that development in the borough will not significantly increase recreational pressure or reduce air quality around the site.

Lee Valley qualifies as an SPA site and Ramsar site. Evidence suggests that recreational pressure may not impact the protected bird species here, but even if so, the 9km between the site and Royal Greenwich, and lack of direct transport routes across the River Thames makes any chance of increased recreational pressure from development proposed in the Local Plan unlikely to significantly impact the site. Similarly, the Local Plan will likely not significantly impact the species within Lee Valley through air quality changes because it will not result in changes to phosphate availability and aims to reduce emissions from transport. In terms of water resource impacts, as this is managed by Thames Water to prevent negative impacts, and alternative sources are available, future population growth is unlikely to result in significant pressure on the Lee Valley reservoirs.

Wimbledon Common is designated a SAC. Evidence similarly indicates that the significant distance of 15km from Royal Greenwich to Wimbledon Common, and the Local Plan's focus on reducing emissions from transport means that development in the borough will not significantly increase recreational pressure or reduce air quality around the site. Some evidence even suggests that some level of recreation may even positively impact some species.

Introduction

In October 2005, the European Court of Justice (ECJ) ruled that Appropriate Assessments (AA) must be carried out on all land use planning documents in the UK. Article 6 of the EC Habitats Directive 1992 sets out the need for Appropriate Assessment, which is interpreted into British law by the Conservation of Habitats and Species Regulations 2010.

Appropriate Assessment is in essence a report which assesses the potential effects of a plan upon a designated European site. The Natura 2000 network is composed of over 600 Special Areas of Conservation (SACs) and over 240 Special Protection Areas (SPAs), however, UK government planning policy also extends the same levels of protection to Ramsar sites (wetlands of international importance designated under the Ramsar Convention), of which there are currently over 140 in the UK.

The overall process set out in the Habitats Directive) is commonly referred to as Habitats Regulations Assessment (HRA).

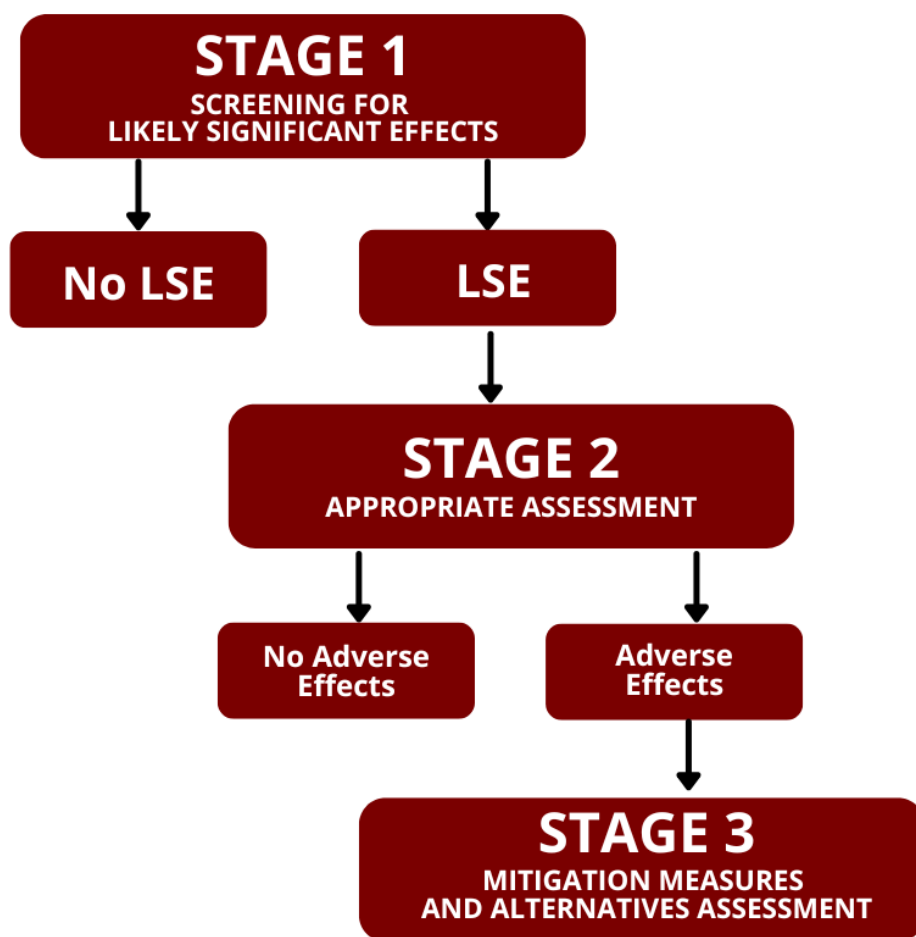


Figure 1: Diagram showing the HRA process.

Stage 1

The first step of the HRA process is a screening assessment, the purpose of which is to screen out if any significant effect is likely for any European or Ramsar site, based on objective information. Where there is a risk of a significant effect on a European or Ramsar site, either individually or in combination with other plans or projects, then there will be a requirement to progress to an Appropriate Assessment.

This HRA Screening Report is for the draft Royal Greenwich Local Plan (Regulation 18). It replaces the adopted Core Strategy (2014) and will provide strategic and detailed policies and site allocations to guide future development in Royal Greenwich.

Determining European or Ramsar sites which may be affected by the Local Plan

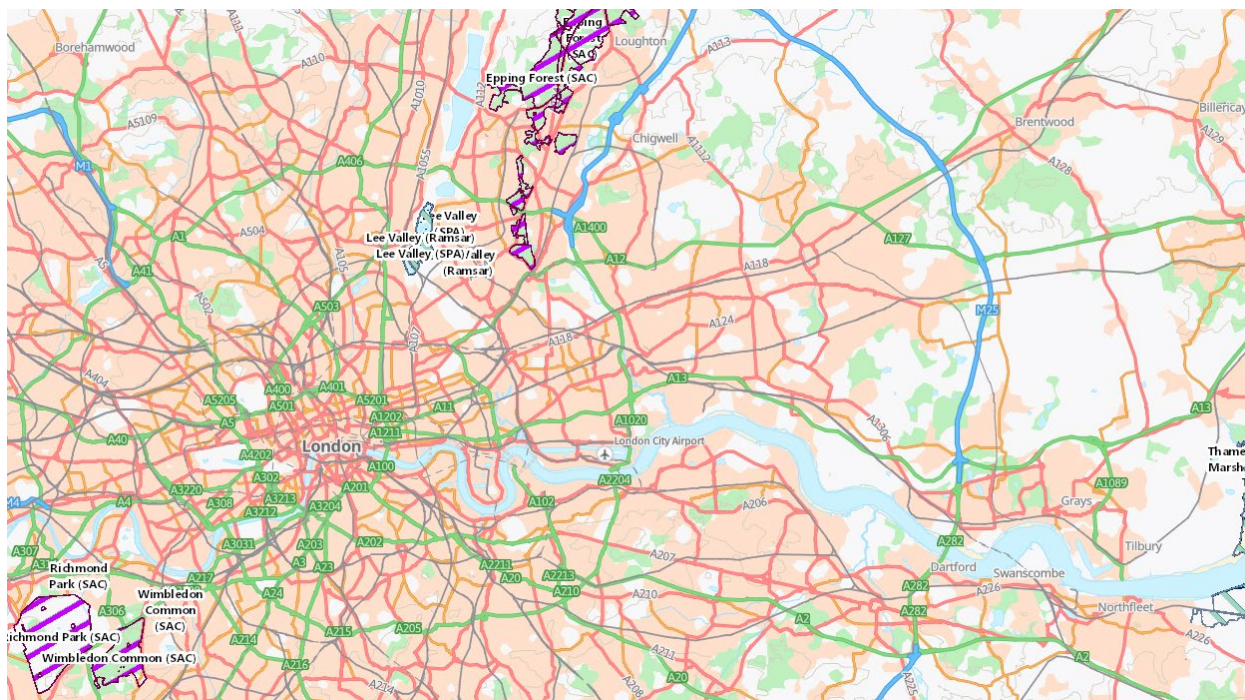
There are no European or Ramsar sites fully or partially in Royal Greenwich, therefore the focus of this assessment will be on sites outside the borough with a potential to be linked to development within Royal Greenwich.

The distance from the Royal Borough to each European or Ramsar site has been noted as this will impact whether each site could potentially face negative environmental impacts (e.g., air or water pollution, harm to species) from the Local Plan. Most Local Plan HRAs adopt a 15km buffer for the identification of European sites that may be exposed to significant effects, however in order to take a precautionary approach in line with HRA government guidance, preliminary consideration has been given to all sites at or within 20km of the Royal Borough of Greenwich.

Five sites (although Lee Valley represents both a Ramsar site and an SPA), are included for preliminary consideration:

Site name	European or other protective designations over site	Approximate distance from the boundary of the Royal Borough of Greenwich (km)
Epping Forest	SAC	9
Lee Valley	Ramsar / SPA	9
Wimbledon Common	SAC	15
Richmond Park	SAC	17
Thames Estuary and Marshes	Ramsar	20

The location of the designated sites is shown on the map below and may be found through the Defra Magic Map website <https://magic.defra.gov.uk/>.



Using the HRA of the London Plan and the European Commission website, RBG identified those European sites within a 20km zone extending from the borough boundaries. A 10km radius was used in the HRA of the existing adopted Core Strategy on the basis of Environment Agency guidance regarding the release of aerial pollutants and their impacts on habitats; however, the HRA of the draft London Plan used a radius of 15km. On that basis, European sites were included in the screening report if they were either wholly or partially within 15km of the boundaries of Royal Greenwich.

The nearest European sites are Epping Forest (SAC), Lee Valley (Ramsar and SPA) and Wimbledon Common (SAC), which are all at or within 15km of Royal Greenwich and are therefore considered within this screening report.

Richmond Park is located 17km away from the Royal Borough, and as such, Royal Greenwich is not considered to be within the core recreational catchment of this SAC site, and is therefore not expected to contribute to the recreational pressure of the site.

Similarly, the Thames Estuary and Marshes (Ramsar site) site is 20km from Royal Greenwich, however, is not expected to be affected by wastewater as water quality in the Thames is expected to improve as a result of significant investments from Thames Water, for instance through expansions of Sewage Treatment Works, the Lee Tunnel and the Thames Tideway Tunnel. For the reasons set out above, the only sites that will be given further consideration are Epping Forest (SAC), Lee Valley (Ramsar / SPA) and Wimbledon Common (SAC).

Features of consideration for European or Ramsar sites

Government HRA guidance outlines that authorities may utilise HRA reports carried out for the same proposal if:

- “there’s no new information or evidence that may lead to a different conclusion
- the assessments already done are relevant, thorough and correct
- the conclusions are rigorous and robust
- there’s no new case law that changes the way an HRA should be carried out or interpreted”

The London Plan forms a key part of Royal Greenwich’s planning policy framework, as the Spatial Development Strategy for the London region. As such, HRA evidence from the London Plan regarding the European and Ramsar sites which could be significantly impacted by the new Royal Greenwich Local Plan, has been used within this Royal Greenwich HRA Screening Report. This is because the London Plan HRA evidence is relevant to this assessment and contains up-to-date and accurate information on the three sites being assessed.

European Site	Protective designation	Approximate distance from borough boundary (km)	Qualifying features
Epping Forest	SAC	9	Atlantic acidophilus beech forests, Northern Atlantic wet heaths with <i>Erica tetralix</i> , and European dry heaths. Stag beetle (<i>Lucanus cervus</i>).
Lee Valley	SPA	9	Internationally important populations of northern shoveler (<i>Anas clypeata</i>), gadwall (<i>Anas strepera</i>), and bittern (<i>Botaurus stellaris</i>).
Lee Valley	Ramsar	9	Nationally scarce plant species (whorled water-milfoil) (<i>Myriophyllum verticillatum</i>) and a rare or vulnerable invertebrate (<i>Micronecta minutissima</i>). Species/populations occurring at levels of international importance: Northern Shoveler (<i>Spatula clypeata</i>), and Gadwall (<i>Mareca strepera</i>).
Wimbledon Common	SAC	15	Supports the most extensive area of open, wet heath on acidic soil in Greater London. Features Northern Atlantic wet heaths including (<i>Erica tetralix</i>), European dry heaths, and stag beetle (<i>Lucanus cervus</i>)

The London Plan HRA identified the various ways in which land use plans can impact internationally designated sites by following the pathways along which development can be connected with those sites. Pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Four impact pathways were identified, and were discussed in relation to each European site:

- Impacts from urbanisation and recreational activities (including disturbance and abrasion)
- Atmospheric pollution
- Water abstraction
- Water quality

Epping Forest SAC (From London Plan updated HRA 2019)

Introduction

70% of this 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Reasons for Designation

Epping Forest qualifies as a SAC for both habitats and species. The site contains Annex I habitats of:

- Beech forests on acid soils with *Ilex* and sometime *Taxus* in the shrub layer.
- Wet heathland with cross-leaved heath; and
- Dry heath
- The site contains Annex II species: Stag beetle *Lucanus cervus*.

Current Pressures

- Air pollution
- Public disturbance
- Inappropriate water levels
- Water pollution

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site

Assessment of impacts:

Recreational activity and urbanisation:

Epping Forest SAC receives a great many visits per year (estimated at over 4 million) and discussions with the Corporation of London (who manage Epping Forest) have identified long-standing concerns about increasing recreational use of the forest resulting in damage to its interest features. A programme of detailed formal visitor surveys has been undertaken in recent years.

In February 2021 Epping Forest District Council and its partners in the West Essex/East Herts Housing Market Area published the results of a visitor survey undertaken of the SAC in 2019. Natural England confirmed to Epping Forest District Council and its partners in August 2017 that the 75th percentile (i.e. the zone within which 75% of visitors derive) should define the 'core catchment' and thus the zone within which net new housing will need to be mitigated in some form. Based on the data from the latest visitor survey, for visitors travelling directly from home (i.e., excluding holiday makers and those visiting non-SAC areas), this is 6.6km. Since that zone crosses numerous London authority boundaries (Waltham Forest, Redbridge, Enfield, Newham, Haringey, Hackney, Tower Hamlets and Barking and Dagenham), and the SAC itself straddles London and Essex, this analysis is inherently 'in combination'.

Epping Forest District Council has developed a Strategic Access Management and Monitoring (SAMM) strategy (2021)¹. This strategy requires London councils whose residents contribute over 2% of visits to the SAC to mitigate the recreational influence of new dwellings created in their boroughs through financial contribution to the upkeep of the SAC, or through the provision of Suitable Alternative Natural Greenspace or improvements to access and capacity of existing greenspaces. The councils who are signatories to this strategy are: Epping Forest District Council, and London Boroughs of Waltham Forest, Redbridge, Enfield and Newham.

The Royal Borough of Greenwich falls well outside Epping Forest's recreational core catchment, being roughly 9km from the SAC at its closest boundary. While some residents of Royal Greenwich are likely to visit Epping Forest, the distance from the borough boundary, and lack of convenient public transportation, means that these numbers are unlikely to be significant. Although the new Local Plan will plan for an increase in housing delivery to meet our target of 42,360 new homes over the 15-year period to 2037, this should still not lead to a significant increase in visitors to Epping Forest because the borough is not in the core catchment so it is unlikely new residents will travel to Epping Forest for recreation, as they will likely choose closer options. The Local Plan will also include the provision of new open space in areas of open space deficiency which will provide residents with more recreational alternatives.

Air quality:

Epping Forest SAC is known to be adversely affected by relatively poor local air quality along the roads that traverse the SAC and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland as well as other features. The nature of the road

¹ Epping Forest District Council SAMM Strategy, 2024:
<https://www.eppingforestdc.gov.uk/app/uploads/2024/02/EB213-Epping-Forest-SAMM-Strategy-2021.pdf>

network around Epping Forest is such that journeys between a number of key settlements around the Forest by car, van or bus effectively necessitate traversing the SAC.

Journey to work census data from 2011 indicate that the London boroughs most likely to contribute to NO_x concentrations and nitrogen deposits within Epping Forest SAC, arising from road traffic, are Waltham Forest, Redbridge and possible Enfield. It is unlikely that any additional growth identified in the Royal Greenwich Local Plan and its associated traffic and construction activities will significantly impact Epping Forest SAC especially as the SAC is north of the River Thames and there are no direct vehicle routes to it.

Additionally, the Local Plan's ambitious stance on transport promotes a shift away from car usage to public transport and active travel, through sustainable location of new housing near public transport nodes and reduction in car parking provision where it is not needed. This will reduce the potential for new residents to have a negative impact on air quality on Epping Forest SAC if they visit it.

Lee Valley SPA and Ramsar

Introduction

The Lee Valley is a series of wetlands and reservoirs located in the north east of London within the Lee Valley Regional Park. The site occupies approximately 24km of the valley and comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of manmade, semi-natural and valley bottom habitats that support wintering wildfowl.

Reasons for Designation

Lee Valley qualifies as an SPA for its Annex I species: Wintering:

- Eurasian Bittern (*Bittern Botaurus stellaris*) Migratory
- Gadwall (*Anas strepera*)
- Shoveler (*Anas clypeata*)

Lee Valley qualifies as a Ramsar site under the following criterion:

- Criterion 2: The site supports the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman); and,
- Criterion 6: species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation):
- Species with peak counts in spring/autumn: Northern shoveler *Anas clypeata*
- Species with peak counts in spring/autumn: Gadwall *Anas strepera*

Current Pressures

- Water pollution
- Hydrological changes
- Recreational disturbance including angling
- Atmospheric pollution

Conservation Objectives

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change; Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely

- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Assessment of impacts

Recreational activity:

Within the past five to ten years, landowners/managers within the SPA (RSPB, the local Wildlife Trust, the Regional Park Authority and Thames Water) have undertaken initiatives both to facilitate and to promote greater public access to the SPA for recreation. Changing public access is fundamentally linked with increasing visitor numbers given that one of the primary reasons for changing the access is to attract more visitors. Most recently, Thames Water's flagship Walthamstow Wetlands project, which opened in October 2017, aims to substantially increase public access to, and use of, Walthamstow Reservoirs, which were little used for recreation and had only been accessible by prior arrangement. Clearly, the various owners and managers of the SPA components would not have embarked on these initiatives (or have been permitted to do it by competent authorities) if it was expected that by providing and promoting greater public access at this location they would risk an adverse effect on the SPA. There is therefore no current evidence that recreational disturbance of the wintering gadwall and shoveler using Walthamstow Reservoirs in international numbers will be incompatible with growth in London over the period 2019-2029 and no a priori reason to assume any mitigation will be needed. This is particularly the case since both species are known to be able to habituate to human activity and the peak of human recreational use of the Walthamstow Wetlands is likely to be in summer when numbers of gadwall and shoveler are at their lowest.

Walthamstow Wetlands Bird Monitoring Report for 2023-2024 states that "visitors adhere to the site's rules and sensitivities and the Wetlands design, and its on-going management can absorb significant recreational use."² Although significant increases in visitor numbers would result in increased disturbance for protected bird species, the report indicates that in 2023-24 there was not a clear or significant change in the overall distribution of key bird species within the reservoirs. Already, the most sensitive areas used by SPA/SSSI/Ramsar species are protected from disturbance through controlling access to them with a network of seasonal gates and footpaths, and jogging and cycling is not permitted on secondary pathways to allow for areas with less disturbance for bird species. Additionally, signage is being created to prevent disturbance incidents. If required, to mitigate higher recreational pressure, measures like these could be increased in number or length of time to better protect species, as is done on other wetland sites. Therefore it is considered that this site has low sensitivity to recreational pressure currently.

² Walthamstow Wetlands Bird Monitoring Report, year 9: April 2023 to March 2024
<https://www.wildlondon.org.uk/sites/default/files/2025-02/Bird%20Monitoring%20report%202023-24.pdf>

Air quality:

The only parts of the Lee Valley SPA/Ramsar site in London are Walthamstow Reservoirs. These are sealed reservoirs that are internationally designated for their populations of wintering gadwall and shoveler ducks. The Air Pollution Information System (APIS) website provides details of critical loads of atmospheric pollution which if exceeded could lead to habitat damage. However, no critical loads are provided for the habitat - open standing water – on which the bird species forming the reason for the international designation rely. The APIS website states that ‘No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often phosphorus limited; therefore decisions should be taken at a site specific level’. In this case, no adverse effects on integrity are anticipated since the South West London Waterbodies SPA, like most freshwater environments, is essentially phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the growth of macrophytes and algae. Royal Greenwich’s new Local Plan will not affect phosphate availability within Walthamstow Wetlands.

Water resources:

Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) is a series of sealed reservoirs that are part of the water supply infrastructure for London. As such, water levels are directly controllable by the site manager (Thames Water) and they have been largely responsible for creating the circumstances that have led to the site being of international importance for its gadwall and shoveler populations. Moreover, Thames Water has invested significantly in water supply infrastructure to ensure that London’s water supply is as resilient as possible. This includes the construction of an operational desalination plant at Beckton in north-east London. Further, there are no wastewater treatment works that have catchments within the Greater London Area boundary that discharge into the River Lee, or its tributaries.

The water supply in Royal Greenwich is largely reliant on water from other areas of London, for example Honor Oak Pumping Station and Nunhead Upper Reservoir, and some of this water supply could come from surface waters from the River Lee which are being held within reservoirs. However, although demand for water from the Royal Borough is likely to increase through increased development promoted by the new Local Plan, it is unlikely that Royal Greenwich will rely on the water supply from the Walthamstow Reservoir, and impossible that its wastewater would affect its water quality. Moreover, as usage of the reservoirs is controlled by Thames Water, this means that overuse of the reservoir is unlikely as Thames Water will manage the resource to ensure that this does not occur, and therefore that the SPA and Ramsar site are not impacted.

Wimbledon Common SAC

Introduction

The site is located within the London Boroughs of Wandsworth and Merton. It is approximately 350ha in size. Wimbledon Common supports the most extensive area of open, wet heath on acidic soil in Greater London. The site also contains a variety of other acidic heath and grassland communities reflecting the variations in geology, drainage and management. Associated with these habitats are a number of plants uncommon in the London area.

Reasons for Designation

The site is designated as an SAC for the following Annex I habitats:

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

The site is designated as an SAC for the following Annex II species:

- Stag beetle *Lucanus cervus*

Current Pressures

- Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood)
- Habitat fragmentation
- Invasive species (specifically oak processionary moth *Thaumetopoea processionea*)
- Atmospheric pollution (nitrogen deposition)

Conservation Objectives

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Assessment of impacts

Recreational activity and urbanisation:

Wimbledon Common SAC is designated mainly for its population of stag beetle *Lucanus cervus*, but is also designated for its wet and dry heathland. Similarly to Richmond Park SAC, the stag beetles are dependent on mature trees and deadwood. These supporting features are not susceptible to any adverse effects of the Local Plan. The Site Improvement Plan for Wimbledon Common SAC identifies that removal of dead wood from the site by visitors could adversely affect the ability of the SAC to support stag beetle. However, this is a very specific action as a result of the personal decision of some visitors and cannot be attributed to growth generally. The heathlands of the SAC are theoretically vulnerable to recreational pressure and Wimbledon Common generally (not just the SAC component) is a popular site for visitors. The latest conservation report on the Wimbledon and Putney Commons website states that 'Being an unfenced Common the whole area is open to the public 24 hours a day throughout the year', however habitat mapping on MAGIC (www.magic.gov.uk) indicates that the heathland is only found in the northern part of the SAC, somewhat reducing this damage.

The Natural England condition assessment for the SAC states that most of the heath fails to meet key targets for quality (although the extent of the heathland is increasing due to a programme of tree and scrub removal). However, the condition assessment also concludes that there are no indications of significant damaging impacts to the heathland arising from non-native species, drainage, trampling, burning or disturbance. Therefore, although the heathland does not yet meet its key targets this does not appear to be attributable to recreational trampling and is more to do with a historic lack of traditional management. That has been extensively addressed in recent years, with the result that 'there has certainly been no loss of heathland, removal of invasive trees and scrub has been carried out, a mosaic of age and structure for heather and gorse has been achieved, pernicious weeds have been kept under control and many areas of the Commons' heathland and acid grassland are now much improved from the condition they were in 10 years ago'. The report also suggests that hotspots of recreational usage at Wimbledon Common SAC are not the heathland areas but the grassland areas, which do not represent any SAC features.

According to Natural England's Countryside Stewardship Negotiation Schedule, the aim of the management of Lowland Heath is 'to provide a mosaic of vegetation which allows all heathland features to flourish, including pioneer heath and bare ground which benefits rarer invertebrates, birds, reptiles and plants'. In response to this, some of the management prescriptions included in the Wimbledon and Putney Commons conservation report for 2016/17 include:

- The creation of bare ground sites through the scraping back of turves.
- The maintenance of a full range of age classes of gorse by cutting and removing arisings.
- The management of dense bracken stands and deep bracken litter layers by rotational cutting, bruising or spraying.

While clearly such measures to open up the sward can be taken to excess, the extent of historic scrub encroachment on the heathland, and these management prescriptions, suggests that in general a lack of physical disturbance and trampling (which would help to retard such

encroachment), from both people and grazing animals, is more of a concern for the heathland areas than excessive footfall. There is a significant distance between Wimbledon Common and Royal Greenwich, which will reduce numbers of visitors from the Royal Borough to the SAC due to long journey times which will encourage residents to go to more local sites such as Greenwich Park. Additionally, as suggested above, visitors are unlikely to cause significant recreational damage to protected heathland on Wimbledon Common SAC because to some extent, some increase in recreational activity may benefit the heathland areas. Therefore, the increases in population supported by the Local Plan's housing targets are not likely to result in negative impacts on this SAC.

Air quality

The Air Pollution Information System concludes that whilst the woodland habitats which stag beetle inhabit are vulnerable to nitrogen deposition, the stag beetles themselves are not. An area of heathland within the SAC, from King's Mere to the north-east, does lie within 200m of the A3 and the A219 at Putney Heath. According to MAGIC the biggest blocks of heathland lie more than 200m from the roads and the total area within 200m of either road is c.3.5ha of heathland. According to the Air Pollution Information System (www.apis.ac.uk) average background nitrogen deposition rates within the SAC do exceed the minimum part of the critical load range for heathland at 15 kgN/ha/yr.

Due to the long distance between Wimbledon Common and the Royal Borough of Greenwich, with 15km as the minimum distance between the two, it is unlikely that residents in the Royal Borough will contribute significantly to air quality impacts on the SAC. Additionally, the Local Plan's ambitious stance on transport promotes a shift away from car usage to public transport and active travel, through sustainable location of new housing near public transport nodes and reduction in car parking provision where it is not needed. This will further reduce the possible air quality impacts that future residents of the Royal Borough could have.

Other strategies or plans

The draft London Plan contains fourteen policies that either make reference to improving air quality in London (other than greenhouse gases which are not directly relevant to impacts on European sites), or which will improve air quality via their delivery, demonstrating a strong commitment to improve air quality within the Greater London Authority boundary. Whilst it is noted that the aim is in general to improve air quality from a public health perspective, any improvement in air quality will have a positive knock-on effect to European designated sites that are sensitive to atmospheric pollution.

Conclusion

This report has identified those European and Ramsar sites within 15km of the borough boundary. These sites are Epping Forest SAC, the Lee Valley SPA and Ramsar, and Wimbledon Common. The assessment reviewed the reasons for site designations and key vulnerabilities. Evidence within this assessment suggests that the significant distance between Royal Greenwich and the protected sites (a minimum of approximately 9km to both Lee Valley and Epping Forest and a minimum of approximately 15km to Wimbledon Common) means that the Royal Borough's residents do not form the 'core catchment' of visitor trips to any of the sites. This, as well as the presence of several high-quality open spaces within the Royal Borough itself mean that the increased population promoted by the Core Strategy, is unlikely to put significant recreational pressure on any of the sites. Indeed, for Wimbledon Common and the Lee Valley, evidence suggests that recreational use may not impact, or even benefit the sites' protected features. In terms of water use, as this is managed by Thames Water, the growth in population within the borough as promoted within Local Plan, is unlikely to impact on the water levels in the Lee Valley reservoirs as the resource will be actively managed to prevent damaging overuse. In cases of severe need, the Royal Borough can utilise other sources such as the desalination plant at Beckton in north-east London.

Additionally, the Local Plan's promotion of low-carbon transport, and the distance of the borough from the sites which deters drivers, will mean that the new Local Plan will not have a likely significant effect on air quality for any European or Ramsar site. Planned improvements to air and water management strategies at a London level are also likely to improve air and water quality, having knock-on benefits for the sites. The Local Plan will also include some specific policies and guidance on air quality, water management and open space enhancements that will aim to minimise adverse effects of development.

As shown within figure 1, this report represents Task 1 of the HRA process. Task 1 is therefore complete, and Tasks 2 and 3 are not relevant as it has been determined that the adoption of the upcoming Royal Greenwich Local Plan is unlikely to result in significant negative impacts on any European or Ramsar sites.

Appendix 4: Health Impact Assessment

Appendix 4: Health Impact Assessment

A Health Impact Assessment (HIA) is not a statutory requirement of the plan preparation process, however, Planning Practice Guidance states that 'Local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making'. It also states that 'a health impact assessment may be a useful tool to use where there are expected to be significant impacts.

Royal Greenwich's Health and Wellbeing Strategy 2023-2028ⁱ sets out the following priorities to improve the health and wellbeing of Royal Greenwich's residents:

- **Start well:** Children and young people get the best start in life and can reach their full potential.
- **Be well:** Everyone is more active and can access nutritious food.
- **Feel well:** There are fewer people who experience poor health as a result of addiction dependency. Fewer adults are affected by poor mental health and fewer children and young people are affected by poor mental health.
- **Stay well:** For everyone to access the services they need on equitable footing. Effective integrated community teams based in neighbourhoods provide the right to support when and where it is needed. Reduce unfair and avoidable differences in health & wellbeing.
- **Age well:** Health and care services support people to live fulfilling and independent lives and carers are supported.

Within the Integrated Impact Assessment framework, as set out in Section 3 of the IIA, many of the sub-criteria have a direct or indirect impact on health. However, the following were identified as being the most relevant.

Objective	Sub-Criteria
1	Will it improve public transport accessibility for all users?
1	Will it reduce the reliance on private vehicles and promote using low carbon ways of travel?
2	Will it improve the design, safety and accessibility of streets and public spaces?
2	Will it encourage active travel and social interaction?
3	Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability?
3	Will it support housing that is energy efficient and climate resilient?
4	Will the policy support the development of neighbourhoods with access to education, healthcare and community facilities?
4	Will it promote social inclusion and reduce inequalities across the Royal Borough?
5	Will it improve open space accessibility for recreation and wellbeing?
6	Will it support the reduction of carbon emissions in line with net zero targets?
7	Will the policy reduce and manage flood risk through sustainable measures?
7	Will it improve water and air quality in the borough?
8	Will it promote access to cultural spaces for wellbeing?
9	Will it promote a safe and vibrant night time economy?

10	Will it improve access to training, education and employment for all residents?
11	Will it improve mental and physical wellbeing through safe environments?
11	Will it reduce health inequalities across the Royal Borough?

The HIA framework below has been structured around these priorities and the relevant IIA sub-criteria, in order to assess the impacts on health of the policies in the draft Local Plan.

Key HIA Questions	H&WB Priority	Housing	Economy	Town Centres	Design and Heritage	Environment	Climate Emergency	Transport
Will it improve public transport accessibility for all users?	Be well Stay well	-	E2	TC1	DH1, DH3	-	-	T1, T3, T4
Will it reduce the reliance on private vehicles and promote using low carbon ways of travel?	Be well	-	E2	TC1, TC2, TC3	DH1, DH3	-	CE2, CE3	T1, T2, T3, T5
Will it improve the design, safety and accessibility of streets and public spaces?	Be well Stay well	H11	-	TC1, TC3, TC4	DH1, DH3	EN1, EN5	-	T1, T3, T6
Will it encourage active travel and social interaction?	Be well Feel well	H11	E6	TC1, TC3, TC4	DH1, DH3	EN1, EN2	-	T1, T2, T3
Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability?	Start well Feel well Stay well Age well	H1, H2, H3, H4, H5, H8, H7, H8, H10	-	TC1	DH1	-	-	-
Will it support housing that is energy efficient and climate resilient?	Stay well Age well	H11	-	-	DH1	EN1, EN6	CE1, CE2, CE4, CE5	-
Will the policy support the development of neighbourhoods with access to education, healthcare and community facilities?	Start well Stay well Age well	H1, H8	E5	TC1, TC7	-	EN2	-	T1, T3, T4
Will it promote social inclusion and reduce inequalities across the Royal Borough?	Start well Stay well	H2, H3, H8	E1, E4, E5	T1, T3, T4, T5	DH1, DH3	-	-	T1, T4, T6
Will it improve open space accessibility for recreation and wellbeing?	Be well Feel well	H11	-	-	DH3	EN2	-	T1, T3
Will it support the reduction of carbon emissions in line with net zero targets?	Be well Stay well	H11	E2	TC1, TC2, TC3	DH1	EN1, EN3, EN4, EN5	CE1, CE2, CE3, CE4, CE5	T1, T2, T3, T5
Will the policy reduce and manage flood risk through sustainable measures?	Stay well	H11	-	-	DH1	EN6	CE1	T2, T3
Will it improve water and air quality in the borough?	Be well Stay well	-	-	TC2	-	EN4, EN5	CE1	T1, T2, T3
Will it promote access to cultural spaces for wellbeing?	Feel well	-	E6	TC3, TC4	DH4, DH5	-	-	-
Will it promote a safe and vibrant night time economy?	Feel well Stay well	-	E6	TC3	DH3	-	-	T4
Will it improve access to training, education and employment for all residents?	Start well Stay well	-	E5	TC5	-	-	-	T4

Will it improve mental and physical wellbeing through safe environments?	Be well Feel well	H11		TC1, TC3, TC4, TC7	DH1, DH3	EN1, EN2, EN4, EN5	CE1, CE5	T1, T2, T3
Will it reduce health inequalities across the Royal Borough?	Stay well	H2, H8	E1, E4, E5	TC3, TC7	DH1, DH3	EN2, EN4, EN5	CE5	T1, T4, T6

Further commentary is provided below on the key impacts on health of the draft policies, arranged by chapter:

Key impacts from Housing policies

Access to appropriate housing is a key social determinant of health. Policies that enable the provision of well-designed, secure and affordable housing therefore have a significant impact on the health of residents, supporting improved long-term health and better mental and physical wellbeing, helping to address health inequalities across the borough.

Policies that ensure that diverse needs are met, such as those delivering supported and specialist housing, and Gypsy and Traveller sites, ensure vulnerable groups have access to safe and appropriate accommodation, which can have a major positive impact on their health and safety. support social inclusion and foster wellbeing.

Policies requiring housing to be located in well-connected areas with access to services and open spaces support active travel and improve access to healthcare, education, and employment. These factors contribute to healthier lifestyles and equitable health outcomes.

Key impacts on health from Economy Policies

Policies that secure employment land for businesses and training initiatives will help to improve access to secure jobs and skills development, which are key social determinants of health.

Policies which promote low-emission transport and active travel contribute to improved air quality and long-term health benefits.

The protection and enhancement of arts and cultural venues and public houses will contribute to vibrant neighbourhoods, helping to promote social interaction and mental wellbeing. Design and accessibility principles help create safe and inclusive environments that support physical and mental wellbeing.

Public toilet provision in high-footfall areas supports health needs, particularly for older people, families, and individuals with specific health conditions. Requirements for wheelchair-accessible hotel rooms and Accessibility Management Plans ensure inclusive access for visitors, supporting equitable health outcomes.

Key impacts from Town Centre policies

Town centres play a vital role in supporting health and wellbeing across Royal Greenwich by acting as vibrant, inclusive, and accessible hubs of community life. They encourage active travel, enhance public spaces, and improve access to cultural, leisure, and community facilities, all of which support physical and mental wellbeing.

Enhancements to the public realm, along with markets and community events, foster physical activity, social interaction, and stronger community cohesion. Accessible education, healthcare, and community facilities within centres help reduce health inequalities and ensure equitable access to essential services.

Managing the concentration of hot food takeaways and gambling venues addresses key public health concerns such as obesity and addiction, while a balanced approach to evening and night-time activities promotes cultural participation, safety, and mental wellbeing.

Key impacts from Design and Heritage policies

The Design and Heritage policies are central to shaping environments that promote both physical and mental wellbeing across Royal Greenwich. By championing high-quality, inclusive, and sustainable design, they help deliver safe, accessible, and attractive public spaces that encourage active travel, social connection, and community cohesion. A strong focus on placemaking, public realm improvements, and the Healthy Streets approach further supports healthier lifestyles and cleaner air.

Heritage-led regeneration strengthens cultural identity and fosters a sense of belonging and continuity that enhances mental health. Protecting and enhancing historic assets, views, and landscapes also sustains wellbeing by preserving valued and familiar environments.

Together, these policies ensure equitable access to safe, high-quality spaces while reinforcing the borough's commitment to health, sustainability, and inclusive growth.

Key impacts on health from Environment Policies

The environment policies in the draft Local Plan aim to protect and enhance open spaces, improve air and water quality, and manage flood risk through sustainable measures that strengthen health and wellbeing across the Royal Borough. By safeguarding natural assets, promoting biodiversity, and creating safer, healthier environments, these policies support both mental and physical wellbeing. Open spaces play a vital role in providing opportunities for physical activity, relaxation, and social interaction, proven to reduce stress, lift mood, and improve long-term health.

The Plan seeks not only to protect and enhance these open spaces but also to improve their accessibility, ensuring more people can benefit from safe, inclusive environments that encourage recreation and wellbeing.

Enhancing environmental resilience, through measures such as improved drainage, reduced pollution, and greener urban areas, further reduces exposure to environmental hazards. These benefits are particularly valuable for vulnerable groups and communities in areas facing environmental deprivation, helping to reduce health inequalities and promote long-term wellbeing.

Key impacts on health from Climate Emergency Policies

Policies which seek to reduce the use of fossil-fuels and their associated pollutants, contribute to improved air quality with better long-term health outcomes.

Policies that promote climate resilient and net zero design principles help to create healthier living environments. Increased comfort for occupants improves mental health and general wellbeing.

Policies which are focused on operational carbon and energy balance and decentralised energy, improve energy security and reduce fuel poverty, thereby promoting equitable health outcomes.

Key impacts on health from Transport Policies

Policies that promote active travel encourage walking and cycling, which improve physical health and mental wellbeing. Enhancements to walking routes and public realm also support safer, more inclusive environments that foster social interaction and mental health.

Policies that support sustainable movement of freight, restrict car parking and reallocate road space to pedestrians and cyclists will help to improve air quality and reduce carbon emissions, both of which contribute to long-term health benefits.

Improvements to public transport services enhance connectivity supporting equitable health outcomes. Provision of disabled parking promotes social inclusion and supports the physical and mental wellbeing of people with mobility impairments.

ⁱ Royal Borough of Greenwich Health & Wellbeing Strategy 2023-2028 - [Health and wellbeing strategy 2023 to 2028 | Royal Borough of Greenwich](#)

Appendix 5: Equalities Impact Assessment

Appendix 5: Equalities Impact Assessment

The Royal Borough has a statutory duty to consider the equality impacts of its decisions. An Equalities Impact Assessment (EqIA) is a way of measuring the potential impact (positive or negative) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. The Act extended the previous duties to cover the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race - including ethnic or national origins
- Colour or nationality
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

The EqIA framework below has been developed in accordance with the Council's Equalities Impact Assessment guidance. It is designed to assess which protected groups may be affected by the policies in the draft Local Plan, and to what extent. Impacts are categorised as 'high', 'medium', 'low', or 'none', and are visually indicated using colour coding to distinguish between positive and negative effects.

The framework is followed by commentary on the consideration of the impact on equality of the draft Local Plan policies, that were identified through the IIA.

HOUSING	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	High	High	Low	None	None	None	None	None	Low	High
Commentary	<p>Policies H1, H8, and H11 support housing for all life stages. H8 promotes ageing in place and specialist older persons housing. Policies H3 and H11 support family housing and play space.</p> <p>Policy H11 requires 10% of new homes to meet wheelchair user standards. H8 supports specialist accommodation for disabled people. H6 and H5 require accessible student and co-living accommodation.</p> <p>Policies H2 and H3 promote affordable and family housing, which can benefit ethnically diverse communities.</p> <p>Policy H3 supports family housing, H8 supports housing for those needing support, and H11 promotes adaptable housing for changing needs, all to the benefit of those with caring responsibilities.</p> <p>For lower income households, Policies H2 and H3 promote affordable housing and intermediate rent products.</p> <p>No direct gender-specific provisions or references to LGBTQ+ or trans inclusion or religious needs, but general housing accessibility and diversity may offer indirect benefits.</p>									

ECONOMY	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	Medium	Medium	Medium	None	None	Low	None	None	None	High
Commentary	<p>Policies E1 and E5 promote inclusive employment and skills development, benefiting both younger and older residents.</p> <p>Policy E6 mandates Accessibility Management Plans and Changing Places toilets, supporting people with disabilities.</p> <p>Policies E1 and E4 support inclusive growth and affordable workspace, which can benefit ethnically diverse SMEs.</p> <p>Policy E6 supports cultural venues which may have religious significance.</p> <p>Policies E1, E4, and E5 strongly support affordable workspace, local employment, and skills development, directly addressing barriers faced by low-income residents and promoting inclusive economic participation.</p> <p>There is no specific or direct reference to gender, LGBTQ+, gender identity inclusion, or maternity needs.</p>									

TOWN CENTRES	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	High	High	Medium	Low	Low	Medium	Low	Low	Low	High
Commentary	<p>Policies TC1, TC3, and TC7 promote inclusive access to town centres, cultural venues, and community infrastructure, benefiting both older and younger residents. TC6 restricts clustering of hot food takeaways and gambling near schools and parks, supporting youth health and wellbeing.</p> <p>Policies TC1, TC3, and TC7 require inclusive design and accessibility. TC7 specifically supports Changing Places toilets and accessible public realm.</p> <p>Policies TC3 and TC4 support inclusive cultural programming and diverse markets, which can reflect and support ethnically diverse communities.</p> <p>Policies TC3 and TC4 address safety and inclusive night-time economy, which may benefit women, LGBTQ+ and trans individuals.</p> <p>TC7 supports protection of places of worship and community infrastructure, which may benefit religious groups.</p> <p>TC7 supports provision of baby changing facilities and accessible toilets.</p> <p>Policies TC1 and TC7 support accessible and inclusive community infrastructure and local services, which could benefit carers.</p> <p>Policies TC1, TC4, and TC7 promote markets and community infrastructure, supporting low-income residents. TC6 restricts clustering of gambling and takeaway uses.</p>									

DESIGN AND HERITAGE	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	Medium	High	Low	Low	Low	Medium	Low	Low	Low	Medium
Commentary	<p>Policies DH1, DH3, and DH8 promote inclusive public realm and walkable environments benefiting older and younger residents. Dementia-friendly design is encouraged in public realm improvements.</p> <p>DH1, DH3, and DH8 require inclusive design, step-free access, and accessible public spaces. Public realm must consider wheelchair and sensory accessibility.</p> <p>DH4 and DH5 promote access to heritage assets and public realm improvements, which can support cultural inclusion.</p> <p>DH3 promotes safe, well-lit public spaces and natural surveillance. DH1 supports inclusive design. Both may indirectly support women, ethnic minorities, LGBTQ+ and trans individuals.</p> <p>DH4 and DH5 protect heritage assets, including places of worship and culturally significant sites, which may benefit religious groups.</p> <p>DH3 supports accessible public realm with seating, shade, and safe routes, which can benefit pregnant women and parents. Public realm improvements support family-friendly design.</p> <p>Policy DH4 supports economic inclusion.</p>									

ENVIRONMENT	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	Medium	High	Low	Low	Low	None	Low	Low	Low	Medium
Commentary	<p>Policies EN1 and EN2 promote access to green infrastructure and open spaces, which benefit older adults and children. EN6 supports flood resilience, which is important for vulnerable age groups.</p> <p>Policies EN1 and EN2 encourage inclusive design and accessibility in green spaces and urban planting. EN5 and EN6 address environmental impacts and flood risk, which disproportionately affect people with disabilities.</p> <p>Policies EN1 and EN2 support safe and accessible public spaces, which may benefit women, ethnic minorities, LGBTQ+ and trans individuals.</p> <p>Policies EN1 and EN2 support access to green spaces and urban planting, which benefit all, especially families.</p> <p>Policies EN1, EN2, EN4, and EN5 promote access to green infrastructure, air quality improvements, and pollution mitigation, of benefit to all, but particularly low-income communities.</p>									

CLIMATE CHANGE	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	Medium	Medium	None	Low	None	None	None	Low	Low	High
Commentary	<p>Policies CE1 and CE5 promote climate resilient and energy efficient buildings, which benefit older adults by reducing fuel poverty and improving comfort.</p> <p>CE1 requires inclusive design and BREEAM 'outstanding' rating for non-residential buildings, which includes accessibility standards.</p> <p>Policies CE1, CE2 and CE5 promote energy efficiency and reduced fuel costs, directly benefiting low-income households.</p>									

TRANSPORT	Age	Disability	Race	Gender (Sex)	Sexual Orientation	Religion or Belief	Gender Identity (Gender reassignment)	Pregnancy or Maternity	Caring Responsibilities	Socio-Economic Background
Impact	Medium	High	Low	Low	Low	Low	Low	Medium	Medium	High
Commentary	<p>Policies T1 and T3 promote active travel and Healthy Streets, benefiting older and younger people. However, reduced car parking through T2 may impact older individuals reliant on vehicles.</p> <p>Policy T6 mandates disabled parking and accessible design. T1 and T3 emphasize inclusive walking and cycling infrastructure, and T2 ensures drop-off and servicing needs are met.</p> <p>Policies T1 and T3 support safer streets and active travel, which may benefit women, but Policy T2 car-free approach may impact those with caring responsibilities, often women.</p> <p>No direct references in transport policies, but inclusive safer streets and public realm improvements in T3 may indirectly support ethnic minorities LGBTQ+ and trans individuals.</p> <p>No specific references, but improved transport access in T4 may support access to places of worship.</p> <p>Policies T1 and T6 support inclusive mobility and accessible parking, which benefit pregnant individuals and parents with young children.</p> <p>Policies T1, T2, and T4 promote affordable and sustainable transport options, benefiting low-income residents.</p>									

To expand on the framework above, the IIA included consideration of the impact of the draft Local Plan policies on equality. While many of the sub-criteria used in the sustainability appraisal have an indirect impact on equality, the following sub-criteria were identified as being the most relevant:

Objective	Sub-Criteria
1	Will it improve public transport accessibility for all users?
1	Will it enhance connectivity between homes, jobs, services and green spaces in the Royal Borough?
2	Will it improve the design, safety and accessibility of streets and public spaces?
2	Will it promote inclusive access for all residents?
2	Will it help people connect, build a stronger community, and create a sense of belonging?
3	Will it support the delivery of housing that meets local needs in terms of type, tenure and affordability?
4	Will the policy support the development of neighbourhoods with access to education, healthcare and community facilities?
4	Will it promote social inclusion and reduce inequalities across the Royal Borough?
5	Will it ensure equitable access to green spaces across all communities?
6	Will the policy promote high standards of sustainable construction and design?
7	Will it ensure environmental improvements benefit all communities equally?
8	Will it promote high quality design that reflects the Royal Borough's identity?
9	Will it promote a safe and vibrant night-time economy?
9	Will it support cultural industries?
10	Will it improve access to training, education and employment for all residents?
11	Will it promote safe, inclusive and vibrant neighbourhoods for all residents?

The key impacts on equalities from each Chapter of the draft Plan are outlined below.

Spatial Policies

The spatial policies support equality by taking a place-based approach to growth that reflects the distinct needs, identities, and opportunities of Royal Greenwich's diverse communities.

Spatial policies prioritise inclusive regeneration, stronger connectivity, and equitable access to essential services, helping to reduce inequalities and create mixed, balanced communities. By focusing development in well-connected areas and investing in active travel, the policies improve connectivity and accessibility for all

residents. They also strengthen neighbourhoods by improving access to education, healthcare, and community facilities, delivered through town centre regeneration, estate renewal, and new mixed-use hubs such as Thamesmead, Woolwich, and Charlton Riverside.

Across all spatial areas, investment in public realm, green infrastructure, and cultural assets helps create safe, welcoming, and inclusive environments. Across the borough, the policies support high-quality design, affordable housing, and community infrastructure that respect local character and provide equal access to homes, jobs, services, and opportunities for wellbeing.

Housing policies

Housing policies play a central role in promoting equality by increasing the supply of homes that meet diverse needs across the Royal Borough. The strong emphasis on affordable housing provision, including targets for low-cost rented and discount market rent units, helps address inequalities by enabling access to secure and suitable accommodation for underrepresented and lower-income groups. Policies supporting housing mix and specialist accommodation ensure that homes are designed to meet the needs of families, students, older people, and those with disabilities, contributing to inclusive and balanced communities.

By requiring developments to be located in well-connected areas with access to services, education, and healthcare, housing policies foster social inclusion and community resilience. The provision of accessible housing and the protection of small and medium-sized family homes further support equitable living conditions.

Policies addressing the needs of the Gypsy and Traveller community and promoting high-quality supported accommodation help reduce disparities and ensure that all residents can live safely and with dignity.

Economy Policies

Policies strongly support inclusive access to employment through provision of affordable workspace, skills development and training. Affordable workspace provision for SMEs and creative sectors can help underrepresented groups to participate in the local economy.

The protection and enhancement of arts and cultural venues and public houses promote community identity and social inclusion and contribute to vibrant and safe neighbourhoods, supporting both economic vitality and social cohesion.

Public toilet provision in high-footfall areas supports accessibility for older people, families, and those with health needs. Requirements for wheelchair-accessible hotel rooms and Accessibility Management Plans ensure inclusive access for visitors.

Town Centre Policies

The Town Centre policies contribute significantly to promoting equality across Royal Greenwich by supporting inclusive, accessible, and vibrant centres that serve the

needs of all residents. By directing development to designated centres and encouraging a diverse mix of uses; including retail, leisure, culture, and community services, the policies help reduce spatial inequalities and improve access to essential amenities.

Enhancements to the public realm, active travel infrastructure, and public transport connectivity improve accessibility for all, particularly older people, disabled residents, and those without access to private vehicles. The promotion of inclusive evening and night-time economy uses, meanwhile activities, and markets fosters social interaction and community cohesion, while safeguarding residential amenity.

Measures to manage concentrations of uses with potential health impacts, such as hot food takeaways and gambling premises, help protect vulnerable groups and promote healthier environments.

Overall, the Town Centre policies support the creation of safe, inclusive, and connected neighbourhoods, helping to reduce inequalities and strengthen community resilience.

Design and Heritage Policies

The Design and Heritage policies support equality by promoting inclusive, accessible, and high-quality environments that reflect the diverse character and needs of Royal Greenwich's communities. By embedding principles of universal design, active travel, and Healthy Streets, the policies help ensure that public spaces and buildings are safe, legible, and welcoming for all residents, including older people, people with disabilities, and families.

The emphasis on placemaking and public realm improvements fosters social interaction and a sense of belonging, while protecting heritage assets and local identity supports cultural inclusion and community pride.

The policies also contribute to equitable access to education, healthcare, and community facilities by requiring development to integrate with surrounding infrastructure and support walkable, well-connected neighbourhoods. Through careful management of views, conservation areas, and historic buildings, the policies help maintain familiar and valued environments that support mental wellbeing and community cohesion.

Overall, the Design and Heritage policies promote safe, inclusive, and resilient neighbourhoods that enable all residents to participate fully in civic and community life.

Environment Policies

Environmental policies play a vital role in promoting equality by ensuring that improvements; such as cleaner air, enhanced water quality, and sustainable flood risk management, benefit all communities across the Royal Borough. By protecting and enhancing open spaces and prioritising fair access to green infrastructure, these policies help to reduce inequalities in access to nature, recreation and wellbeing.

A focus on inclusive design and accessibility, including better provision for wheelchair users and people with physical disabilities, ensures that open spaces and environmental improvements benefit everyone. In doing so, these measures foster social inclusion by enabling all residents; regardless of age, ability or background, to participate in community life, access safe and welcoming public spaces, and enjoy the health and wellbeing benefits of a high-quality environment. This inclusive approach helps strengthen community cohesion and contributes to the creation of vibrant, attractive and equitable neighbourhoods across the borough.

Climate Emergency Policies

The Climate Emergency policies support equality by promoting sustainable development that benefits all communities across Royal Greenwich. By requiring net zero carbon design, low energy use, and climate resilience in all new developments, the policies help reduce fuel poverty and improve living conditions, particularly for vulnerable groups such as low-income households, older people, and those with health conditions. The emphasis on retrofitting existing buildings supports equitable access to comfortable, energy-efficient homes and helps address disparities in housing quality.

Policies promoting decentralised energy and renewable generation enhance local energy security and reduce reliance on fossil fuels, contributing to cleaner air and healthier environments. The integration of circular economy principles and whole life carbon assessments ensures that environmental improvements are inclusive and long-lasting.

Importantly, the policies also support the development of neighbourhoods with access to education, healthcare, and community facilities by encouraging sustainable, well-connected, and adaptable buildings that can accommodate a range of uses. Overall, the Climate Emergency policies contribute to more resilient, inclusive, and equitable communities across the borough.

Transport policies

Transport policies promote social inclusion, reduce isolation, and support the creation of equitable and connected neighbourhoods.

Transport policies support equality by promoting inclusive access to sustainable travel options and improving connectivity across the borough. Enhancements to walking and cycling infrastructure, including safer, well-lit, and less cluttered routes, enable more people, particularly those with mobility challenges, to travel independently and safely. Improvements to the public realm and active travel routes also support access to open spaces, fostering healthier lifestyles and greater social interaction.

Policies focused on public transport improvements and accessible parking standards for disabled people help reduce barriers to mobility and participation in community life. By ensuring that transport infrastructure is designed with accessibility in mind, these policies contribute to the physical and mental wellbeing of residents, especially

older people and those with disabilities.

Conclusions

The Equalities Impact Assessment demonstrates that the draft Local Plan policies are broadly supportive of promoting equality and inclusion across Royal Greenwich. No negative impacts have been identified at this stage. The assessment highlights a range of positive impacts across protected characteristics, particularly in relation to age, disability, and socio-economic background.

However, the assessment also identifies areas where further consideration or targeted mitigation may be beneficial:

- Gender, sexual orientation, and gender identity: While some indirect benefits are noted, more explicit policy references could strengthen inclusion.
- Pregnancy and maternity: Continued attention to family-friendly design and facilities will support equitable access.

It is acknowledged, however, that individuals and groups with lived experience are best placed to assess the potential impacts of policies and proposals. Their feedback is essential to validate findings and identify any unintended impacts.

Continued monitoring is essential throughout the implementation of the Plan. By maintaining a proactive and responsive approach to equality, the Royal Borough can ensure that the Local Plan delivers positive outcomes for all residents and contributes to a fairer, more inclusive Greenwich.