

Royal Borough of Greenwich Local Plan

Integrated Impact Assessment (Regulation 19 Publication Draft)

June 2026

Non-Technical Summary

Introduction

This document provides a summary of the Integrated Impact Assessment (IIA) prepared to support the Royal Borough of Greenwich's Regulation 19 Draft Local Plan (2025–2040).

The purpose of the IIA is to assess the likely environmental, social and economic effects of the Local Plan and to ensure that sustainability considerations are fully integrated into plan-making. It brings together several types of assessment into a single process, including:

- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)
- Habitats Regulations Assessment (HRA) Screening
- Equalities Impact Assessment (EqIA)
- Health Impact Assessment (HIA)

The IIA has been undertaken alongside the preparation of the Local Plan, helping to shape policies and identify ways to maximise positive effects and minimise negative impacts.

The Draft Local Plan

The Local Plan sets out a long-term strategy for growth and development in the borough to 2040. It aims to deliver:

- New homes, including affordable housing
- Employment opportunities and economic growth
- Thriving town centres
- High-quality design and protection of heritage
- Improved environmental quality and climate resilience
- Sustainable transport and well-connected communities

Baseline and Key Issues

The IIA is informed by an understanding of current conditions in the borough and the key challenges it faces. Key issues include:

- Housing pressure driven by population growth and affordability challenges
- Economic challenges, including low job density and reliance on small businesses
- Health and social inequalities across different parts of the borough
- Environmental pressures, including air quality, flood risk and climate change
- Unequal access to green space and services

Without the Local Plan, development would still occur, but in a less coordinated way. This could lead to:

- Greater uncertainty in how growth is managed across the borough
- More fragmented and less sustainable patterns of development
- Reduced ability to secure infrastructure and environmental improvements

How the Plan Was Assessed

The IIA uses a framework of 11 sustainability objectives, covering the following topics:

- Sustainable Transport
- Public Realm
- Housing
- Communities
- Open Space
- Climate change
- Environment
- Heritage
- Town Centres
- Economy
- Health and wellbeing

Each policy in the Local Plan has been assessed against these objectives to understand its likely effects, using a consistent scoring system.

Reasonable alternatives for the overall spatial strategy were also considered and compared.

Reasonable Alternatives and Preferred Approach

Three broad spatial strategy options were assessed:

1. Strategic place-based growth
2. Lower density, dispersed growth
3. High-density growth focused in a small number of locations

The strategic place-based approach performs best overall because it:

- Balances housing delivery with infrastructure capacity
- Supports sustainable transport and town centres
- Protects green spaces and heritage
- Promotes inclusive and well-planned communities

Key Findings of the Assessment

Overall effects

The IIA finds that the Local Plan is likely to result in predominantly positive effects, particularly in relation to:

- Housing delivery, including affordable homes
- Economic growth and employment opportunities
- Improved town centres and public spaces
- Health and wellbeing, through better environments and access to services
- Sustainable transport and reduced car dependency

The Plan is expected to:

- Promote energy efficiency and low-carbon development
- Enhance green infrastructure and biodiversity
- Improve resilience to climate change and flood risk

Potential negative or uncertain effects

Some potential adverse or uncertain effects may arise, including:

- Increased pressure on infrastructure and services from growth
- Impacts on air quality, particularly during construction
- Risks relating to flood management and climate change

However, these effects are generally mitigated through policies within the Plan, including environmental safeguards, design standards and infrastructure requirements.

Health and Equalities Effects

The Local Plan is expected to have positive impacts on health and equality, including:

- Improving access to housing, jobs and services
- Supporting active travel (walking and cycling)
- Enhancing access to green space
- Reducing inequalities between communities

The assessment shows that the Local Plan helps to address the wider determinants of health and supports more inclusive outcomes.

Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) Screening Assessment has been undertaken to consider whether the Local Plan is likely to have significant effects on designated European sites.

The HRA Screening concludes that the Local Plan is not likely to result in significant adverse effects on designated European sites, either alone or in combination with other plans or projects. As such, it is not necessary to proceed to the next stage of HRA (Appropriate Assessment).

Cumulative Effects

The combined effect of all policies is expected to be overall positive, particularly in delivering:

- Sustainable patterns of growth
- Improved environmental quality
- Stronger, more inclusive communities

Some cumulative pressures (such as increased demand for infrastructure) are recognised but are addressed through the coordinated approach of the Plan.

Monitoring

The Council will monitor the effects of the Local Plan over time to ensure that:

- Predicted impacts occur as expected
- Any unforeseen negative effects are identified early
- Appropriate action can be taken if needed

Next Steps

This IIA Report is published alongside the Regulation 19 Draft Local Plan for consultation.

At this stage, you can comment on whether the Local Plan and its supporting evidence, including this report, have been prepared properly and are suitable for examination.

All comments received will be submitted and considered as part of the independent examination.

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1 Introduction

1.1 The Draft Local Plan

The Royal Borough of Greenwich is preparing a new Local Plan to cover the period 2025 to 2040. 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 Regulation 19 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 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 Regulation 19 draft Plan sets out a set of objectives that have been updated from those included in the Regulation 18 Local Plan, including the addition of a new objective concerning the visitor economy and social infrastructure. All developments in the borough are expected to support and contribute towards the delivery of these objectives.

Places

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.

Housing

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

Employment and Town Centres

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 town centres and designated employment areas such as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS).

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.

Support the visitor economy and social infrastructure: We will strengthen Royal Greenwich's role as a visitor destination, supporting sustainable tourism, culture, leisure and hospitality uses, while ensuring a high-quality and inclusive offer. We will support and protect social infrastructure, including community, health, education and cultural facilities, and require development to contribute appropriately to its delivery

Design and Heritage

Promote high-quality design across all development: We will ensure new development achieves a high standard of design 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 and local views.

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.

Environment

Create healthy, high-quality and resilient environments: We will deliver attractive, accessible and sustainable places that people want to use, and which support our communities' health and wellbeing. We will do this through strengthening environmental quality in both green spaces and urban environments, improving air

and water conditions, minimising pollution, and creating resilience to climate change through provision of infrastructure and urban greening.

Protect natural assets and promote sustainable environmental management:

We will enhance biodiversity and green and blue infrastructure and ensure development responsibly manages impacts such as flood risk, contamination and waste, supporting a more sustainable and resource-efficient borough.

Climate Emergency

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.

Delivering a circular and low-carbon built environment: We will promote whole life carbon reduction and circular economy principles in all development, prioritising the reuse of existing buildings and materials, minimising embodied carbon, and ensuring that resources are used efficiently and sustainably throughout the lifecycle of development.

Transport

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.

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 33 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 Planning Practice Guidance (PPG) on Strategic environmental assessment and sustainability appraisal at paragraph 006³ encourages that “work (on the sustainability appraisal process) should 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](#)

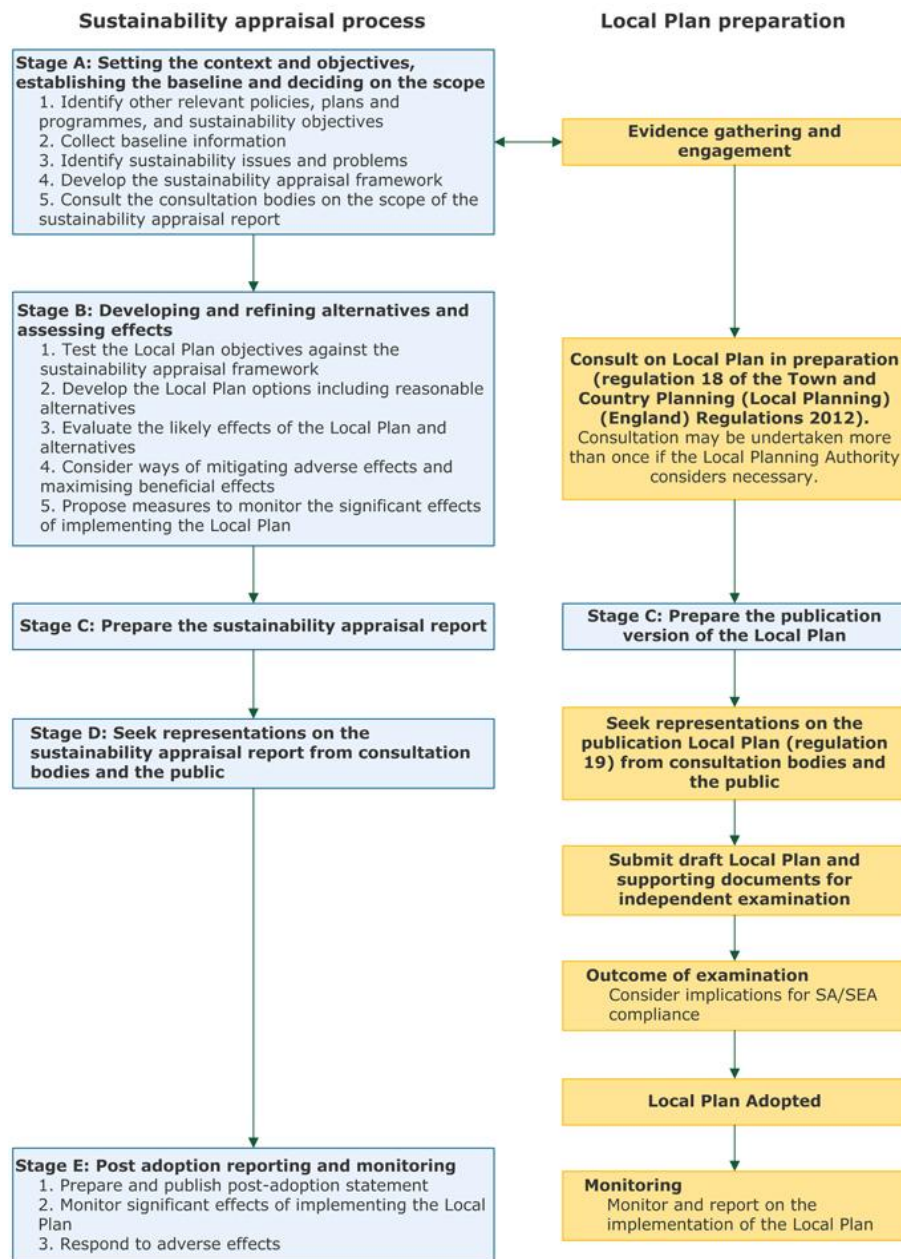


Figure 1: Sustainability Appraisal process

Stage A (setting the context and objectives, establishing the baseline and deciding on the scope) formed the IIA Scoping Report. Stage B (developing and refining alternatives and assessing effects) was reported in the Regulation 18 Draft IIA. Both were published alongside the Regulation 18 Local Plan for consultation between December 2025 and February 2026.

This report has been prepared alongside the Regulation 19 draft Local Plan (Stage C) and presents the findings of the Integrated Impact Assessment of the policies contained within the Regulation 19 draft Local Plan. It incorporates and responds to comments received on both the Scoping Report and the IIA Report accompanying the Regulation 18 Local Plan, with these considerations reflected throughout the

assessment. A summary of the representations received, together with the Council's responses, is provided in an appendix to this report.

Representations are sought on this IIA Report alongside the Publication Draft Local Plan as part of the Regulation 19 consultation in July-September 2026 (Stage D).

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 incorporates 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 people's health.

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

Equalities Impact Assessment (EqIA)

Royal Greenwich 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 and nationality)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

Carrying out an EqIA 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 were developed and an IIA Framework established, which has been used to assess the effects and impacts of the draft policies in both the Regulation 18 Draft Local Plan and the Regulation 19 Draft Local Plan.

[The Integrated Impact Assessment Scoping Report](#), which forms part of the evidence base for this assessment, was published alongside the Regulation 18 Draft Local Plan. The Scoping Report sets out the baseline environmental, social and economic conditions within the Royal Borough and identifies the key sustainability issues. The key findings are summarised below, together with the likely evolution of these baseline conditions in the absence of the Plan. Together, these elements provide the baseline against which the effects of the Local Plan have been assessed.

Where consultation responses were received specific to the Scoping Report, the points raised have been noted and addressed within the relevant sections below.

2.1 Baseline information and data

The collection of baseline information was an important part of the scoping process for the IIA as it provided a snapshot of the conditions in Royal Greenwich at that time. This key information was a starting point to help identify the key sustainability issues and problems, establishing the current economic, social and environmental context. It provided 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.

Without the Local Plan, it is recognised that change within the borough would continue to occur through a range of mechanisms, including national policy, the London Plan, regeneration projects, and individual development proposals brought forward through the planning application process. However, the Local Plan provides the primary statutory framework at the local level for coordinating growth and managing change in a comprehensive and integrated way. It is the only vehicle through which the Council can set a coherent spatial strategy and apply consistent, cross-cutting policies that address combined social, economic and environmental objectives.

In the absence of the Local Plan, there would be greater uncertainty in how change across the borough is planned and managed, with housing delivery, economic growth and environmental outcomes more reliant on piecemeal development proposals and external drivers rather than a clearly defined spatial strategy. This could reduce the ability to coordinate development effectively and to ensure that issues such as air quality, flood risk and climate resilience are addressed in a consistent and strategic manner. There would also be a reduced ability to secure infrastructure provision, climate resilience measures and environmental enhancements in a coordinated way through development. Overall, this would be likely to result in more fragmented and less sustainable patterns of development across the borough.

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 in 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.

During the consultation on the Scoping Report and the IIA Report accompanying the Regulation 18 Local Plan, Historic England and the Environment Agency identified a number of plans and strategies as missing or superseded from the 'Relevant Plans, Programs and Strategies Section' of the Scoping Report.

Consequently, in addition to the documents listed within the Scoping Report, the following documents have also been reviewed in the preparation of the draft Regulation 19 Local Plan:

International

- Guidance and Toolkit for Impact Assessments in a World Heritage Context, UNESCO, (2023)

National

- EA2030: Change for a Better Environment, Environment Agency (2025)
- Environmental Improvement Plan, DEFRA (2025)
- Green Infrastructure Framework, Natural England (2023)
- The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning Note 1, Historic England (2015)
- National Flood and Coastal Erosion Risk Management Strategy for England, Environment Agency (2020)

Regional

- Local Nature Recovery Strategy (LNRS), GLA (2026)
- Tackling Pollution in London's Rivers, ZSL (2017)
- Thames Estuary 2100 Plan (TE2100 update), Environment Agency (2023)
- Water Resources Management Plan, Thames Water (2024)

Local

- Maritime Greenwich World Heritage Site Management Plan, Maritime Greenwich World Heritage Site Partnership (2014)

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, which collectively cover the issues identified in Annex I of the SEA Directive, including biodiversity, population, human health, environmental resources and cultural heritage, and the relationships between them.

IIA Objective 8 has been refined following a representation from Historic England to refer to the wider historic environment rather than 'built heritage', to ensure that it encompasses other heritage assets such as parks and gardens, landscapes and archaeological sites.

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 heritage

Sustain and enhance Royal Greenwich's historic environment and townscape, ensure design is of an exemplary standard that respects 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 Greenwich' Priorities	'Our Greenwich' Missions	IIA Objectives
	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	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	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	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	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	Sub criteria for assessment Including EqIA* / HIA* considerations
5: Respect the Royal Borough's open spaces	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	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	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 heritage	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? *
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? *
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? **

IIA Objective	Sub criteria for assessment Including EqIA* / HIA* considerations
	d) Will the appropriate infrastructure be improved to support economic growth?
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? **

3.2 Methodology and Scope

Each of the policies within the Regulation 19 draft Local 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 Local 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 undertake 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.

Level of Impact	Description of the effect
++ Major Positive	Likely significant positive effect on the objective: Likely to deliver significant and lasting benefits across a large area of the Borough, positively impacting a large number of people and environmental factors. The effects are likely to be direct, permanent and of a substantial magnitude.
+ Minor Positive	Some positive contribution but not significant: The anticipated beneficial effects are expected to be limited to smaller areas of the Borough, smaller groups of people and environmental factors. These factors may be direct or indirect, temporary or reversible.
0 Neutral	No clear relationship or negligible effect: 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	Some adverse impact: Minor negative effects are expected to be limited to smaller areas of the Borough, limited to small groups of people and environmental factors. These factors may be direct or indirect, temporary or reversible.
--	Likely significant adverse effect: Likely to affect the whole or larger area of the Borough, impacting

Level of Impact	Description of the effect
Major negative	a large number of people and environmental factors. The effects are likely to be direct, irreversible, permanent and of a substantial magnitude.
? Uncertain/Mixed	Insufficient evidence / highly context-dependent: This criterion is applied in cases where there is insufficient information to support a conclusive assessment. It is also used when evaluation presents both positive and negative effects and where it is unclear where the positive or negatives outweigh each other.

The policies and overall development strategy were first assessed as reported in the IIA which accompanied the Regulation 18 draft Local Plan. The IIA findings together with representations received have informed updated and amended policies within the Regulation 19 draft Local Plan.

These revised policies have been reassessed; the assessment of the effects of the policies is attached in full as Appendix 2. The key findings are summarised in sections 5.1 to 5.8 of this report, including where there are significant changes to the assessed impact of the policies.

In applying this framework, effects are considered 'significant' where they are likely to be of substantial magnitude, affect a large proportion of the borough or population, and/or are long-term or irreversible in nature. In many instances, where negative or uncertain effects were been identified in the assessment, mitigation is embedded within the policies themselves, or elsewhere in the plan, for example through design requirements and environmental safeguards. Since these mitigation measures are expected to reduce potential adverse effects, such that residual effects are generally reduced to neutral.

In addition to the assessment of individual policies, cumulative effects have also been considered. This recognises that the overall impacts of the Local Plan will arise from the combined and interacting effects of policies across all thematic areas. While the detailed assessment presented in Appendix 2 focuses on the effects of individual policies against the IIA objectives, these findings have been drawn together and reviewed at a strategic level to identify potential cumulative, synergistic and conflicting effects. The outcomes of this assessment are set out in Section 6 of this report, which considers how policies operate collectively, including the identification of any potential cumulative negative or uncertain effects and the role of mitigation measures in addressing these.

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 5.9.

3.4 Approach to Health Impact Assessment

The Health Impact Assessment (HIA) is integrated within the Integrated Impact Assessment (IIA) framework. While many of the IIA sub-criteria have direct or indirect implications for health and wellbeing, the most relevant for assessing the health impacts of the draft Local Plan policies have been identified in the table below.

The HIA considers how the Regulation 19 draft Local Plan policies perform against these key questions, which reflect the wider determinants of health, including housing, access to services, environmental quality, transport, and socio-economic factors.

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 assessment is also informed by, and aligned with, the priorities set out in the Royal Greenwich Health and Wellbeing Strategy 2023–2028, ensuring a consistent and locally relevant approach to assessing health outcomes.

A structured HIA framework has been applied to assess the likely effects of policies across each chapter of the Local Plan, supported by qualitative commentary identifying how policies contribute to physical and mental wellbeing and the reduction of health inequalities.

The full Health Impact Assessment is provided at Appendix 4. The key findings are summarised in Section 5.10.

3.5 Approach to Equalities Impact Assessment

The Equalities Impact Assessment (EqIA) is integrated within the Integrated Impact Assessment (IIA) Framework. While many of the IIA sub-criteria have indirect implications for equality, the following have been identified as being the most directly relevant to assessing the impacts of policies on different groups.

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 to this integrated approach, the Council has developed a dedicated EqIA framework to provide a more detailed and structured assessment of the likely

impacts of the draft Local Plan policies on different groups. This framework assesses impacts across the protected characteristics set out in the Equality Act 2010, and, in accordance with the Council's Equalities Impact Assessment guidance, also considers groups defined by caring responsibilities and socio-economic background.

The EqIA framework applies a consistent scoring system ('high', 'medium', 'low' or 'none') supported by qualitative commentary to identify the nature and significance of potential impacts across policy areas.

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 49,630 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 existing or planned 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 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 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.

The reasonable alternatives set out above were originally developed and assessed

as part of the Regulation 18 stage of plan preparation. The overall spatial strategy of the Local Plan has not materially changed between Regulation 18 and Regulation 19. Amendments made to the Regulation 19 draft Plan relate primarily to policy refinement, clarity and strengthening of requirements rather than fundamental changes to the distribution or quantum of growth. As such, the conclusions of the alternatives appraisal remain valid and it has not been necessary to revisit the assessment of reasonable alternatives at this stage.

4.2 Appraisal of options

	Alternative 1: Strategic Place-Based Approach	Alternative 2: Lower-Density Dispersed Growth Approach	Alternative 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, reflecting the strong interrelationships between policies within each section of the Local Plan, and the benefits of considering these policies collectively. Only those objectives for which an impact has been identified are discussed.

The findings of the assessment have informed the refinement of policies between Regulation 18 and Regulation 19, including strengthening policy wording to enhance positive effects and address potential adverse or uncertain impacts. Where there has been a substantive change in the assessment of a policy's effect between the Regulation 18 Plan and the Regulation 19 Plan (for example, from a minor positive to a major positive effect), further detail is provided to explain how amendments to policy wording, scope or emphasis have influenced the assessment outcome. For clarity, not all changes are highlighted; where differences arise solely from the reorganisation of content between policies, without materially altering the overall approach or effect, these have not been identified as substantive changes in the assessment.

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 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), reflecting support for higher density development in accessible locations, reduced car dependency and enhanced walking and cycling infrastructure. Charlton and Thamesmead and Abbey Wood make a more significant contribution due to major public transport interventions, including a new riverside bus route, potential river services, DLR extension and rapid bus transit.

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), reflecting strong emphasis on high-quality design, placemaking, improved streetscapes and enhanced public spaces. Charlton (P3) makes a particularly significant contribution due to comprehensive regeneration proposals delivering new public realm, including a linear park and enhanced riverside access in an area which currently has poor environmental quality and pedestrian experience.

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 spatial areas which fall within Opportunity Areas due to the scale of housing delivery planned.

Objective 4: Build resilient and inclusive communities

There are positive contributions towards meeting this objective from all of the spatial area policies, due to their emphasis on providing well-designed, sustainable and inclusive neighbourhoods. There are particularly strong contributions from Charlton (P3) and Thamesmead and Abbey Wood (P5), reflecting the delivery of community infrastructure (including schools), and creation of inclusive neighbourhoods. Within the Regulation 18 Plan, only 5 of the spatial area policies were considered to have a positive impact; three additional spatial area policies within the Regulation 19 Plan are judged to have a positive impact: Greenwich, Westcombe Park and Blackheath due to the introduction of explicit policy on community infrastructure provision and Plumstead and Shooters Hill and Kidbrooke and Middle Park due to the addition of a new clause on inclusive and sustainable communities

Objective 5: Respect the Royal Borough's open spaces

There are positive contributions towards meeting this objective from 7 of the 8 spatial area policies, (P1, P2, P3, P4, P5, P7 and P8), due to their emphasis on safeguarding open spaces and the delivery of new and enhanced green and blue infrastructure. The most significant impact is through the Thamesmead and Abbey Wood Policy, reflecting the scale of public new open space provision associated with the proposed New Town, including a major riverside park and integration of blue infrastructure. Within the Regulation 18 Plan, 5 of the spatial area policies were considered to have a positive impact; two additional spatial area policies within the Regulation 19 Plan are judged to have a positive impact: Woolwich due to the introduction of explicit policy on open space provision and improved access to natural assets and Eltham, Avery Hill, Coldharbour and New Eltham due to the addition of a new clause regarding preservation of the areas green character and open spaces.

Objective 6: Accelerate sustainable, climate resilient development

There are positive contributions towards meeting this objective from 5 of the 8 spatial area policies (P1, P2, P3, P4 and P5), due requirements relating to climate resilience, flood risk management and the integration of green and blue infrastructure. Within the Regulation 18 Plan, none of the spatial area policies were considered to have a positive impact; however, changes introduced through the Regulation 19 Plan have resulted in five policies now being assessed as having a minor positive effect. This reflects a shift from implicit to explicit policy support for climate resilience, including new provisions on green and blue infrastructure, ecological enhancement and river corridor function (P1), the inclusion of a heat network to support low-carbon energy (P2), explicit requirements relating to flood risk management and alignment with the Thames Estuary 2100 Plan (P3 and P5), and strengthened policy wording on climate-resilient design, green infrastructure, transit-oriented development and riverside adaptation (P4). Overall, the revised Spatial Policies demonstrate a stronger and more explicit approach to embedding climate resilience across growth areas.

Objective 7: Improve environmental resilience and resource efficiency

Within the Regulation 18 Local Plan, only one spatial area policy (P1) was considered to have a positive impact, primarily due to a reference to ecological management of open spaces; however, strengthened policy wording has resulted in a further 5 spatial area policies now being assessed as having a positive impact. This reflects the introduction of more explicit and comprehensive environmental measures, including consideration of microclimate (P2), a strong and integrated approach to flood risk management, green infrastructure and sustainable transport (P3), explicit requirements for biodiversity enhancement and multifunctional green infrastructure (P4), enhanced integration of blue and green infrastructure alongside flood resilience and waste management capacity (P5), and a new clause on urban greening with links to wildlife corridors (P6).

Objective 8: Sustain and enhance the Royal Borough's culture and 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 Greenwich Park, 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 delivery of a proposed New Town with a rejuvenated and vibrant centre around a new DLR station.

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 all 8 spatial area policies, due to their emphasis on encouraging active travel, improving public transport infrastructure and supporting inclusive and sustainable development to provide homes and jobs. Within the Regulation 18 Plan, only 6 of the spatial area policies were considered to have a positive impact; two additional spatial area policies within the Regulation 19 Plan are now judged to have a positive impact: Plumstead and Shooters Hill (P6) and Kidbrooke and Middle Park (P8) due to the introduction of new clauses relating to urban greening of the public realm and encouraging new active travel routes.

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 Purpose-built student accommodation
- H6 Housing with shared facilities
- H7 Supported and specialist accommodation
- H8 Small sites and subdivisions
- H9 Extensions
- 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'. No negative impacts have been identified across any of the policies.

Objective 1: Encourage sustainable transport and enhance connectivity

Policies H1, H4, H5 and H6 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 by increasing housing supply, improving affordability, and ensuring quality housing which 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. Policies H2 and H3 are particularly strong in supporting inclusive communities and addressing affordable housing need.

Objective 5: Respect the Royal Borough's open spaces

Policies H4, H5, H6 contribute positively by requiring the provision of new amenity space in areas of deficiency and improving access to existing open spaces.

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 H8 and H11 contribute positively towards meeting this objective; Policy H8 by protecting biodiversity on small sites and H11 by promoting sustainable waste management.

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

Policy H8 contributes positively by ensuring development respects local character and context.

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

Policies H1, H4, H5 and H6 direct residential development to highly accessible locations, including town centres and high streets. This supports increased footfall and contributes positively to vitality and viability and 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 principally since access to a safe and appropriate home is strongly linked to health and wellbeing outcomes.

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

No impacts have been identified on objectives 2 'Enhance the public realm', 5 'Respect the Royal Borough's open spaces' or 8 'Sustain and enhance the Royal Borough's culture and heritage'. No negative impacts have been identified 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 supports 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 and E5, with Policy E4 having a major positive effect. 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. The Regulation 18 Plan policy was assessed as having a mixed effect since while it supports carbon reduction through land optimisation and sustainable freight, industrial processes may also increase emissions. However, that inclusion of more explicit sustainable freight requirements within the Regulation 19 Plan policy have been assessed to outweigh any potential negative impact due to emissions from industrial processes, which are likely to be minimal due to regulated control.

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 9: Revitalise town centres, high streets and cultural assets

Policies E4 contributes significantly by supporting affordable workspace in retail centres, encouraging commercial diversification and attracting creative industries.

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 and E5,

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.

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. 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 The Visitor Economy
- TC4 Culture, Evening and Night-Time economy uses
- TC4 Markets, temporary events and meanwhile uses
- TC6 Managing hot food takeaways and gambling uses
- TC7 Social and community Infrastructure
- TC8 Public Houses

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'. No negative impacts have been assessed 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 highly accessible locations

Objective 2: Enhance the public realm

The majority of the policies contribute towards meeting this objective. Policies TC1, TC4, TC5 and TC7 promote activation of the public realm through events, markets, and community uses, supporting increased footfall, improved safety and accessibility. Policy TC6 reduces the adverse impacts from clustering of harmful uses, and TC8 retains buildings that contribute to streetscape and local character, both supporting improved public realm quality.

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 activation of public spaces, support for cultural and social activity and the provision of a diverse mix of uses that meet local needs. 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 heritage

Policies TC1, TC3, TC5 and TC8 contribute positively to meeting this objective. Policy TC3 provides a major positive effect through strengthening cultural and tourism uses and supporting the borough's historic and cultural assets. Policy TC8 makes a significant contribution through the protection of public houses with heritage and community value. Policy TC1 supports the protection and enhancement of the character and heritage of centres while Policy TC5 enhances local identity and townscape character by supporting markets. Policy T5 was not considered to impact positively on Objective 8 in the Regulation 18 Plan, but this assessment has changed due to the introduction of an explicit requirement to conserve and celebrate the heritage and historical significance of markets within the Regulation 19 Plan policy.

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 support the vitality and viability of centres through strengthening the town centre hierarchy, applying a town centres first approach, supporting the visitor economy and enabling a vibrant evening and night-time economy. Markets, events and meanwhile uses further support activation of spaces and increased footfall across the borough's centres.

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

Policies TC1 and TC4 make the most significant contributions to this objective by supporting town centres as key economic hubs and enabling a diverse range of commercial, cultural, leisure and evening economy uses. Policies TC2 and TC3 further support economic activity by protecting the vitality and viability of centres and strengthening the role of the visitor economy. Policies TC5 and TC8 contribute by supporting local enterprise, flexible business models and hospitality uses, including through markets, meanwhile uses and public houses, sustaining employment and economic activity within centres.

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

The majority of the policies contribute positively towards health and wellbeing. Policies TC6 and TC7 make the most significant contributions, with TC6 improving public health by reducing access to unhealthy food and restricting gambling venues, and TC7 enhancing inclusivity and accessibility through the provision of social and community infrastructure. Policies TC1, TC4 and TC5 contribute a minor positive effect through public realm improvements and the activation of spaces, supporting community safety, social interaction and overall wellbeing. Within the Regulation 18 Plan, Policy TC7 was assessed as having a minor positive effect; however, the assessment been upgraded to a major positive effect in the Regulation 19 Plan due to strengthened requirements for inclusive infrastructure provision.

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 urban 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. DH1 promotes walkable neighbourhoods, permeability, and active travel infrastructure, while DH8 supports river-based transport and delivery of a continuous Thames Path footpath and cycleway.

Objective 2: Enhance the public realm

All policies contribute positively, with Policy DH3 making a major positive contribution as it establishes a comprehensive framework for high-quality, inclusive, and accessible public realm across the borough. Other policies provide minor positive contributions through improvements to accessibility, placemaking, heritage-sensitive design, and townscape quality.

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 housing delivery through design-led intensification and appropriate tall building development. However, Policy DH5 has a minor negative effect due to constraints on development within the World Heritage Site and its buffer zone which may limit capacity.

Objective 4: Build resilient and inclusive communities

Policies DH1, DH2 and DH3 contribute towards this by promoting inclusive, safe and accessible environments, supporting social cohesion, and enhancing community infrastructure through improved public realm and shared spaces.

Objective 5: Respect the Royal Borough's open spaces

The majority of policies contribute towards meeting this objective, through promoting urban greening, protecting historic parks and landscapes, enhancing ecological value, and improving access to open spaces and the riverside.

Objective 6: Accelerate sustainable, climate resilient development

Policy DH1 makes a major positive contribution through requirements for climate-

responsive design, sustainable construction and energy efficiency. Policy DH2 makes a minor positive contribution through sustainable design and mitigation measures for tall buildings.

Objective 7: Improve environmental resilience and resource efficiency

Policy DH1 makes a major positive contribution through promoting efficient land use, sustainable resource management, and flood mitigation. Policies DH3 and DH8 provide minor positive contributions through requirements relating to sustainable materials, SuDS, biodiversity enhancement and climate adaptation. Policy DH2 has a mixed effect, reflecting its support for efficient land use and sustainability alongside potential adverse impacts on daylight, sunlight and microclimate.

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

This is the strongest area of performance, with all policies making a positive contribution. Policies DH4 and DH5 have a major positive effect, ensuring conservation and enhancement of heritage assets and the Outstanding Universal Value of the World Heritage Site. The remaining policies make minor positive contributions by reinforcing local character, protecting views and integrating heritage into placemaking.

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

Policies DH2, DH3 and DH7 contribute towards meeting this objective. These policies support regeneration and vitality through increased residential density in centres, enhanced public realm, and other improvements that strengthen townscape quality and attractiveness.

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 provide minor positive contributions by supporting active environments, access to green and riverside spaces, and improved safety and accessibility.

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 Managing flood risk
- EN7 Sustainable drainage
- EN8 Strategic waste management

No impacts have been identified on 8 'Sustain and enhance the Royal Borough's culture and built heritage' or 9 'Revitalise town centres, high streets and cultural

assets' although indirect benefits to place quality may arise through environmental improvements. No negative impacts have been identified across any of the policies.

Objective 1: Encourage sustainable transport and enhance connectivity

Policies EN1 and EN8 contribute positively to this objective. The assessment of Policy EN1 recognises the role of green links and footpaths in improving walking and cycling connectivity. Policy EN8 promotes the 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. EN1 improves the character and functionality of the public realm through urban greening, while EN2 supports the delivery of new and improved open spaces, improving accessibility usability and inclusivity.

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

While the Environment policies do not directly influence housing delivery, EN6 and EN7 support the delivery of high-quality and safe housing by ensuring that development is located, designed and constructed to minimise flood risk.

Objective 4: Build resilient and inclusive communities

Policies EN1, EN2 EN3 and EN6 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. Policy EN6 strengthens community resilience by reducing vulnerability to flood risk and safeguarding people and infrastructure. Within the Regulation 18 Plan, only Policies EN1 and EN2 were considered to have a positive impact on this objective. Policy EN3 is now judged to have a positive impact due to additional detail on protecting publicly accessible designated sites. Policy EN6 has been included due to recognition of how reduced vulnerability to flood events contributes to community resilience.

Objective 5: Respect the Royal Borough's open spaces

Policies EN1, EN2 EN3 and EN7 contribute positively to meeting this objective. EN1, EN2 and EN3 have been assessed as making a significant contribution by protecting and enhancing designated and non-designated open spaces, addressing deficiencies in provision, improving biodiversity and promoting urban greening and the multifunctional use of open spaces, including for food growing and recreation. Policy EN7 makes a contribution through the delivery of SuDS.

Objective 6: Accelerate sustainable, climate resilient development

The majority of the policies contribute positively to this objective. Policies EN6 and EN7 make particularly strong contributions, with major positive effects identified due to flood risk management and the implementation of SuDS to improve resilience to climate change. Policies EN1 and EN3 support climate mitigation and adaptation through urban greening, biodiversity enhancement and carbon sequestration. EN2 contributes through protecting open spaces that support urban cooling and flood mitigation. EN4 promotes sustainable design and reduces emissions associated with

development. EN5 contributes by managing environmental stressors that affect climate resilience.

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 collectively increase urban greening, improve air quality, help to manage pollution, enhance biodiversity and support the efficient use of natural resources. Policy EN8 contributes by supporting the circular economy and sustainable waste management.

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

The Environment policies do not drive economic growth, although Policy EN8 makes a minor positive contribution to this objective by supporting the circular economy and safeguarding waste management infrastructure, which enables sustainable economic activity and employment in recycling, resource recovery and environmental services.

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

All policies contribute positively to this objective. EN4 and EN5 have been assessed as making the most significant contributions by reducing exposure to pollution, directly addressing public health concerns. Policies EN1, EN2 and EN3 support mental and physical wellbeing through improved access to green infrastructure, open space and biodiversity. Policies EN6 and EN7 contribute by ensuring safe and flood-resilient environments, reducing risks to people and property. Policy EN8 contributes by ensuring effective waste management and reducing environmental pollution. Within the Regulation 18 Plan, Policies EN3 and EN11 were not considered to have an impact on this objective. Policy EN3 is now judged to have a positive impact due to recognition of the health and wellbeing benefits of an additional detail in the Regulation 19 Local Plan on protecting publicly accessible designated sites. Policy EN6 has been included due to the addition of a clause in the Regulation 19 Plan that waste processing activities should be fully enclosed within a building which provides environmental protection to minimise emissions and protect environmental quality.

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 supports the transition to a net zero carbon borough 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 supply
- CE4 Whole life carbon and circular economy
- CE5 Retrofitting and existing buildings

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

Objective 3: Housing

Policies CE1 and CE2 contribute positively to this objective. CE1 promotes climate-resilient and adaptable housing design, while CE2 ensures that new housing meets high standards of energy efficiency, supporting the delivery of sustainable and high-quality homes.

Objective 4: Build resilient and inclusive communities

There is a positive contribution across several policies. Policies CE2 and CE3 support energy security and affordability through efficient energy systems and decentralised energy networks, helping to reduce fuel poverty and improve resilience. Policy CE4 encourages the use of local reclaimed materials, reducing reliance on imports and supporting local identity and Policy CE5 promotes retrofit of existing buildings, helping to maintain community cohesion and enhance local identity.

Objective 5: Respect the Royal Borough's open spaces

Policy CE1 contributes positively by integrating urban greening and nature-based solutions into climate-resilient design, supporting the enhancement and multifunctional use of open spaces.

Objective 6: Accelerate sustainable, climate resilient development

This is the strongest area of contribution, with all policies making a major positive contribution. The policies establish a robust framework to support the transition to net zero. They promote high standards of energy efficiency, renewable energy generation, decentralised energy networks, whole life carbon reduction, circular economy principles, and the retrofit of existing buildings.

Objective 7: Improve environmental resilience and resource efficiency

All policies contribute positively to this objective. Policies CE1, CE2 and CE3 support reductions in operational carbon emissions and improve resilience to climate impacts. Policies CE4 and CE5 contribute through reducing embodied carbon, minimising construction waste, and promoting resource efficiency through reuse and retrofit. Within the Regulation 18 Local Plan, Policies CE1, CE2, CE3 and CE4 were assessed as having minor positive effects. However, the introduction of explicit standards within the Regulation 19 Plan has strengthened these policies, including more clearly defined and measurable requirements relating to climate-resilient design, energy performance, decentralised energy, and whole life carbon alongside circular economy principles. This includes defined energy performance targets, requirements for net zero operational carbon, heat network connection, and embodied carbon limits, providing greater certainty that development will achieve significant reductions in carbon emissions and resource use. As a result, the revised policies are now assessed as having major positive effects.

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

Policy CE5 is the only policy to contribute towards this objective; by requiring the by promoting the sensitive retrofit and reuse of existing and historic buildings, supporting their long-term conservation while improving environmental performance.

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

Policy CE5 is the only policy to contribute towards this objective, encouraging the sustainable adaptation and reuse of existing buildings in town centres, supporting

their continued viability while maintaining local character.

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

Policies CE1 and CE2 contribute positively by improving indoor environmental quality, including thermal comfort and air quality, thereby reducing risks associated with extreme temperatures. Reduced reliance on fossil fuels and associated emissions also contributes to wider public health benefits.

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

No impacts have been identified on Objective 8 ‘Sustain and enhance the Royal Borough’s culture and heritage’. No negative impacts have been identified although one Policy has a mixed impact on Objective 2.

Objective 1: Encourage sustainable transport and enhance connectivity

This is the strongest area of contribution with all of the policies having a positive impact towards meeting the objective, and four of the policies having a significant positive impact. 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.

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; reducing car dominance to improve the public realm while risking increased illegal parking that could impact negatively.

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 enable higher density development in accessible locations.

Objective 4: Build resilient and inclusive communities

Policies T1, T2 and T3 make minor positive contributions towards creating sustainable communities by improving safety, accessibility, and inclusion. The Regulation 18 Draft Policy T2 was not considered to have an impact on Objective 4, but this assessment has changed with the inclusion of disabled parking requirements which support social inclusion and accessibility.

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

All of the policies contribute positively to this objective, Policies T1, T2, T3 and T4 support modal shift away from private vehicles, while T5 promotes more sustainable freight movement, collectively contributing to reduced carbon emissions.

Objective 7: Improve environmental resilience and resource efficiency

Policies T1, T2 and T3 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. Less areas of parking, will reduce surface water runoff and improve land efficiency.

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 T2 and T3 contribute minor positive effects by improving safety and inclusive access. The Regulation 18 Draft Policy T2 was not considered to have an impact on Objective 11, but this assessment has changed with the inclusion of disabled parking requirements which will improve the physical and mental wellbeing of those who need to use it.

5.9 Key findings from the Habitats Regulations Assessment

The HRA Screening Report assessed the potential impacts of the Royal Greenwich Local Plan 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

The Health Impact Assessment (HIA), presented in full at Appendix 4, provides a detailed assessment of how the Regulation 19 draft Local Plan policies are likely to influence health and wellbeing across the Royal Borough.

The assessment indicates that the policies are expected to have significant positive effects on health and wellbeing. This is primarily through addressing the wider determinants of health, including housing quality and affordability, access to services and facilities, sustainable transport, environmental quality, and opportunities for employment and social interaction. The alignment of Local Plan policies with the priorities of the Royal Greenwich Health and Wellbeing Strategy 2023–2028 further supports the delivery of improved health outcomes.

Positive effects are identified across all policy areas. In particular, the Plan promotes:

- access to high-quality and affordable housing;
- improved access to healthcare, education and community infrastructure;
- enhanced opportunities for active travel and social interaction;
- improved environmental quality, including air quality and access to green space; and
- more inclusive and cohesive communities.

These outcomes are expected to contribute to improvements in both physical and mental wellbeing, as well as helping to reduce health inequalities across the borough.

While the overall effects are positive, the assessment recognises that potential adverse impacts may arise, particularly in relation to the delivery of growth and new development. These include pressures on infrastructure, temporary construction impacts, and potential localised effects such as noise, air quality and changes to amenity. As a strategic assessment, the extent of these impacts will depend on implementation through individual development proposals.

The Local Plan includes a comprehensive framework of mitigation measures to address these potential effects. This includes policies relating to design quality, environmental protection, infrastructure provision and the application of the Agent of Change principle, ensuring that impacts are appropriately managed and mitigated.

Overall, the integration of health considerations throughout the Local Plan supports the creation of healthier, more inclusive and resilient communities. Ongoing monitoring of health outcomes, alongside continued alignment with health and wellbeing priorities, will be important to ensure that these benefits are realised through the implementation of the Plan.

5.11 Key findings from the Equalities Impact Assessment

The Equalities Impact Assessment (EqIA), presented in full at Appendix 5, provides a detailed assessment of the likely impacts of the Regulation 19 draft Local Plan policies on different groups. This includes the protected characteristics defined in the Equality Act 2010, as well as groups identified through the Council's Equalities Impact Assessment guidance, including those with caring responsibilities and those from different socio-economic backgrounds.

The assessment demonstrates that the draft Local Plan policies are expected to have broadly positive effects in promoting equality and inclusion across Royal Greenwich. Positive impacts are identified across all policy areas, particularly in relation to age, disability and socio-economic background. These benefits are primarily associated with policies that improve access to housing, services, sustainable transport, employment opportunities and high-quality environments.

Indirect positive effects are identified for race, religion or belief, and caring responsibilities. There are more limited explicit references within policies to gender, sexual orientation, gender identity, and pregnancy and maternity; however, the overall policy framework is expected to generate indirect benefits through inclusive design, improved accessibility and enhanced safety.

No significant adverse impacts have been identified at this stage; however, as a strategic and plan-level assessment, some impacts will depend on implementation through individual development proposals.

Overall, the integration of equality considerations within the Local Plan supports more inclusive growth, reduced inequalities and improved access to opportunities. Ongoing engagement with communities, particularly those with lived experience, together with monitoring of equality impacts, will be important to ensure that these outcomes are realised through the implementation of the Local Plan.

6 Cumulative Impact

The Integrated Impact Assessment has primarily considered the effects of individual policies against the IIA objectives; however, it is recognised that the overall effects of the Local Plan will arise from the combined and interacting influences of policies across all themes. These cumulative effects include synergistic (reinforcing positive), additive, and, in some cases, conflicting interactions.

6.1 Overall cumulative effects

The assessment demonstrates that the Local Plan is likely to result in strong cumulative positive effects across the majority of sustainability objectives. This reflects the Plan's integrated approach, whereby spatial strategy, infrastructure provision, environmental protection, and climate policies are intended to operate collectively rather than in isolation.

In particular, the cumulative effects are expected to be most significant in relation to:

- Objective 3 (housing) and Objective 4 (communities), where the spatial strategy, housing policies and town centre policies combine to deliver substantial growth alongside supporting social infrastructure.
- Objective 6 (climate resilience) and Objective 7 (environmental resilience and resource efficiency), where Climate Emergency and Environment policies work in combination with design and transport policies to embed sustainable development principles across all new development.
- Objective 11 (health and wellbeing), where cumulative benefits arise through improved housing quality, access to green space, active travel infrastructure and enhanced local services.

These effects are reinforced by the Plan's place-based spatial strategy, which focuses growth in accessible locations.

6.2 Synergistic (reinforcing) effects

A number of synergistic relationships between policy themes have been identified, which enhance positive outcomes:

- Climate Emergency (CE) + Design (DH) + Transport (T)
Together these policies promote energy-efficient buildings, sustainable travel patterns and climate-resilient urban form, resulting in cumulative benefits for carbon reduction, air quality and health.
- Housing (H) + Town Centres (TC) + Economy (E)
The co-location of housing with services, employment and community uses supports inclusive growth, reduces the need to travel, and contributes positively to the vitality and viability of centres.
- Environment (EN) + Spatial Policies (P1–P8)
The requirement for green and blue infrastructure, biodiversity enhancement and sustainable drainage across all spatial areas results in borough-wide improvements to environmental quality and resilience.
- Health, equalities and inclusion
Cross-cutting policy requirements relating to accessibility, inclusive design and social infrastructure combine to support more equitable outcomes.

These reinforcing relationships mean that, when implemented together, the policies are likely to produce greater benefits than would be achieved individually.

6.3 Potential cumulative negative or uncertain effects

While no significant adverse effects have been identified at the individual policy level, some potential cumulative tensions have been identified that require careful management.

Viability and deliverability of development

The cumulative effect of policy requirements, particularly those relating to climate mitigation and adaptation, alongside design, affordable housing, infrastructure contributions and environmental standards, may have implications for the viability and deliverability of development in some locations. This may impact more on smaller-scale developments or SMEs where compliance costs are likely to be proportionally higher. While these requirements are necessary to achieve the Local Plan's sustainability objectives, there is a potential risk that, in combination, they could impact development feasibility particularly on more constrained or complex sites and inclusive economic growth. These effects are uncertain and will depend on site-specific circumstances and market conditions. They are expected to be mitigated through viability testing, proportionate and flexible application of policy where justified, and ongoing monitoring of development activity and delivery rates.

Infrastructure delivery and timing

The positive cumulative effects rely on timely provision of supporting infrastructure (including transport, education, health and utilities). Delays in delivery could reduce the extent of anticipated benefits or lead to short-term negative effects.

Development pressure and environmental capacity

The scale of planned growth may place pressure on open spaces, biodiversity, and environmental quality if not mitigated through effective implementation of Environmental and Climate Emergency policies.

Heritage and townscape impacts

Cumulative impacts from intensification, particularly in Opportunity Areas and locations suitable for taller buildings, could result in localised effects on heritage assets and townscape if not carefully controlled through design and heritage policies.

Construction and transitional effects

In the short term, cumulative construction activity associated with large-scale regeneration may give rise to temporary effects such as noise, disruption, and emissions. These potential effects are generally localised and manageable, and are mitigated through the Plan's policy framework, including requirements for environmental protection, infrastructure delivery, and detailed assessment at planning application stage.

6.4 Cumulative health and equalities effects

The cumulative effects of the Local Plan have also been considered in relation to health and wellbeing (HIA) and equalities (EqIA), reflecting the integrated approach to assessment.

Overall, the Plan is expected to result in positive cumulative health outcomes, arising from the combined effects of improved housing quality, enhanced access to green and open spaces, promotion of active travel, improved environmental quality, and strengthened community infrastructure provision. These factors are key determinants of health and wellbeing and are embedded across multiple policy areas, including Housing, Environment, Climate Emergency, Design and Transport.

The cumulative effects are also expected to support reductions in health inequalities, particularly through improved access to affordable housing, employment opportunities, sustainable transport, and local services. Nevertheless, as identified in the Health Impact Assessment, there remains potential for localised or short-term adverse effects, including pressures on infrastructure, environmental impacts associated with growth, and temporary construction effects, which will require ongoing management and mitigation.

From an equalities perspective, the cumulative effects of the Plan are anticipated to be positive overall, supporting more inclusive and accessible communities. The combined impact of policies promoting inclusive design, accessible transport, affordable housing, and equitable access to services is expected to particularly benefit groups including disabled people, older people, and those from lower socio-economic backgrounds. Nevertheless, as identified in the Equalities Impact Assessment, the extent to which these benefits are realised will depend on effective implementation. While the spatial strategy will lead to varied levels and types of provision across the borough, there remains a risk of unequal outcomes if delivery is not coordinated and proportionate to local needs.

6.5 Temporal and spatial distribution of effects

Cumulative effects are expected to vary over time. Some neutral or minor negative effects may occur during construction and early phases of development, while in the medium to long term, significant positive cumulative effects are anticipated as development is completed, infrastructure is delivered, and environmental enhancements become established.

Spatially, the most pronounced cumulative effects (both positive and potential adverse) are likely to occur within Opportunity Areas and major growth locations, where multiple policies and allocations interact.

6.6 Mitigation and enhancement

The Local Plan includes a range of mechanisms to ensure that cumulative effects are appropriately managed and enhanced, including:

- Strong environmental and climate policy requirements
- A design-led approach to development
- Infrastructure planning and alignment with growth
- A monitoring framework to track significant effects and enable corrective action

Ongoing monitoring will be critical to ensure that any unforeseen cumulative effects

are identified early and that mitigation measures can be implemented where necessary.

7 Monitoring

7.1 Purpose of Monitoring

Monitoring will be undertaken to track the social, environmental and economic effects of implementing the Local Plan and to assess how effectively its policies are being delivered over the plan period. It will provide an important feedback mechanism to support the ongoing implementation of the Local Plan and inform any future review.

In accordance with the Strategic Environmental Assessment (SEA) Regulations, monitoring will:

- Identify the significant effects (positive and negative) of the Local Plan
- Verify whether the predicted effects identified in the IIA are occurring
- Identify any unforeseen adverse effects at an early stage
- Enable the Council to take timely and appropriate corrective action, including policy intervention or review where necessary

7.2 Approach to Monitoring

The monitoring framework has been developed to align with the IIA objectives and assessment framework. Monitoring is structured around the 11 IIA Objectives, ensuring a clear link between the assessed effects within the IIA, the mitigation measures proposed and the indicators used to track outcomes.

The framework focuses on significant sustainability effects, particularly where delivery of key policy objectives is critical, baseline conditions highlight existing pressures and where uncertain or mixed effects were identified through the IIA.

The IIA monitoring framework has informed the Monitoring Framework set out in Chapter 11 of the Local Plan. Monitoring will be undertaken primarily through the Authority Monitoring Report (AMR) and will draw on a range of local, regional and national datasets.

7.3 Monitoring Framework

The proposed monitoring framework is set out below. This identifies:

- Key indicators linked to each IIA objective
- Potential data sources and monitoring mechanisms
- Potential trigger points for intervention
- Objectives with significant effects (highlighted in **bold**)

Indicators will be kept under review and refined over time to ensure they remain proportionate, effective and aligned with emerging data, evidence and policy priorities. As monitoring progresses and the effects of the Local Plan become clearer, the framework may be refined to focus on the most significant effects, particularly where monitoring indicates potential adverse outcomes or where targeted intervention is required.

IIA Objective	Key Indicator(s)	Likely Effect Monitored	Possible Source	Potential trigger for action
1. Encourage sustainable transport and enhance connectivity	• Healthy Streets Scorecard • Modal split	Use of sustainable transport; reduced car dependency	Transport for London, Internal RBG data	Decline in sustainable mode share
2. Enhance the public realm	• Design awards • Secured by Design accreditation	Quality, safety and accessibility of public realm	Internal RBG data, Metropolitan Police	Decline in design quality
3. Boost the supply of high-quality housing	• Net additional dwellings • Affordable housing delivery • Housing mix • Specialist accommodation provision	Meeting housing needs; affordability; inclusivity	Planning London Datahub, Internal RBG data	Housing delivery below trajectory or failure to meet affordable housing targets
4. Build resilient and inclusive communities	• Delivery of community and social infrastructure	Access to services	Planning London Datahub, Internal RBG data	Infrastructure provision not keeping pace with development
5. Respect the Royal Borough's open spaces	• Loss of protected open space • Access to open space • Green flag award	Protection and enhancement of green infrastructure	Greenspace Information for Greater London (GiGL), Internal RBG data	Loss of open space Loss of green flag status
6. Accelerate sustainable climate resilient development	• Energy performance of new development • On site renewable energy provision • Carbon offset contributions	Carbon reduction; climate resilience	Internal RBG data, Developers' Energy Statements	Failure to meet targets
7. Improve environmental	• Air quality (NO₂ and PM_{2.5})	Environmental quality; biodiversity outcomes	Greenspace Information for Greater London, Internal RBG	Air quality decline Down grading of SINC's

IIA Objective	Key Indicator(s)	Likely Effect Monitored	Possible Source	Potential trigger for action
resilience and resource efficiency	• Developments achieving $\geq 10\%$ Biodiversity Net Gain • Condition of SINCs		data, Environment Agency	
8. Sustain and enhance the Royal Borough's culture and heritage	• Assets on the Heritage at Risk Register	Heritage condition and protection	Historic England	Additions to the Register
9. Revitalise town centres, high streets and cultural assets	• Footfall figures • Vacancy rates • Visitor numbers	Vitality and viability of centres	Planning London Datahub, GLA High Streets Data, Visit Greenwich, Internal RBG data	High vacancy rates
10. Support and promote inclusive economic growth and boost employment opportunities	• Delivery of employment floorspace • Provision of affordable workspace • Unemployment rates • GLLAB data	Economic growth and access to jobs	Planning London Datahub, Internal RBG data, ONS, GLLAB	Significant increase in unemployment, or proportion of young people not in education, employment or training (NEET) in comparison to similar Local Authorities.
11. Improve the quality of life, safety and health and wellbeing of communities	• Life expectancy • Obesity and public health indicators	Health outcomes and inequalities	Internal RBG data, NHS	Worsening health

7.4 Monitoring of Significant Effects

The monitoring framework places particular emphasis on tracking the following objectives, where significant effects, uncertainty in outcomes, or existing baseline challenges have been identified through the IIA:

- **Housing delivery and affordability (IIA Objective 3)** given the ambitious housing targets set out in the Local Plan and the identified risk of under-delivery or insufficient affordable housing provision, which are critical to meeting local needs.
- **Climate mitigation and adaptation outcomes (IIA Objective 6)** reflecting the scale of development proposed in the Local Plan and the importance of achieving net zero targets, alongside uncertainty regarding the implementation of policy measures in delivering carbon reduction and climate resilience and potential impacts on viability.
- **Environmental quality and biodiversity (IIA Objective 7)** due to existing baseline pressures, including poor air quality and the need to ensure that development delivers measurable environmental improvements.
- **Town centre vitality and economic performance (IIA Objectives 9 and 10)** recognising ongoing structural changes in retail and employment patterns, uncertainty in future economic conditions, and the importance of supporting resilient and inclusive economic growth.
- **Health and wellbeing outcomes (IIA Objective 11)** reflecting the presence of health inequalities within the Borough and the role of planning in influencing wider determinants of health.

7.5 Reporting and Review

Monitoring results will be reported through the Authority Monitoring Report (AMR), which is produced on an annual basis, to ensure that the Local Plan remains effective, responsive to changing circumstances, and aligned with national planning policy requirements and the London Plan.

Where monitoring identifies that key targets are not being met or significant adverse effects are occurring, with potential trigger points being met over a sustained period, the Council will consider appropriate remedial action. This may include targeted interventions, engagement with stakeholders or, where necessary, a partial or full review of relevant policies.

7.6 Limitations

Data availability may evolve over time and some indicators rely on external data sources beyond the control of the Council. The monitoring framework will therefore need to remain flexible and may be updated where necessary. It is also recognised that changes observed may not be solely attributable to the implementation of policies within the Local Plan.

8 Next Steps

This Integrated Impact Assessment Report is published alongside the Regulation 19 Draft Local Plan for consultation.

At this stage, representations are invited on whether the Plan and its supporting evidence, including this IIA Report, are legally compliant and sound.

All duly made representations will be submitted for consideration as part of the independent examination.

Appendix 1:

Summary of Regulation 18 Representations and the Council's responses

Appendix 1: Regulation 18 IIA Consultation Responses

Consultee

Resident

Is the baseline information within the Scoping Report accurate and complete?

Yes

Do the IIA objectives reflect the key priorities for Greenwich?

Yes

Is the methodology for assessing impacts robust and appropriate?

Yes

Are there any additional impacts (positive or negative) that should be considered?

Archaeological assets, or potential archaeological assets.

Do you agree with the conclusions drawn in the IIA regarding the preferred development strategy?

Yes

Is there anything else you would like to tell us about the Integrated Impact Assessment?

No. I think it's sound.

RBG Response

IIA Objective 8 has been amended to refer to heritage and the historic environment, rather than 'built heritage' which encompasses other heritage assets including archaeological sites. Archaeological assets are addressed through Policy DH4 of the Local Plan. The 'Policy designation' section of each site allocation identifies when it is within an area of high archaeological potential.

Consultee

Environment Agency

Is the baseline information within the Scoping Report accurate and complete?

No comment

Do the IIA objectives reflect the key priorities for Greenwich?

Add National Plans, Programmes & Strategies:

DEFRA Environmental Improvement Plan (EIP) 2025

Environment Agency 2030 Strategy (EA2030)

National Flood and Coastal Erosion Risk Management Strategy for England

Water Resources Plan

Green Infrastructure Framework

Add Regional Plans, Programmes & Strategies:

Thames Water - Drainage and Wastewater Management Plans (DWMP) 2025

Thames Estuary 2100 Plan (2023) and Greenwich Council Briefing note (see Appendix 3)

Tackling Pollution in London's Rivers - November 2017

London Local Nature Recovery Strategy (LNRS)

Is the methodology for assessing impacts robust and appropriate?

No comment

Are there any additional impacts (positive or negative) that should be considered?

No comment

Do you agree with the conclusions drawn in the IIA regarding the preferred development strategy?

No comment

Is there anything else you would like to tell us about the Integrated Impact Assessment?

We are keen to work with you to develop some measures to assess the overall environmental performance across Greenwich as the Local Plan is delivered through the

annual monitoring plan. Some suggestions below:

Flood risk and climate change

Number of applications decided in line with Environment Agency planning advice

Metres of new flood defences and tidal terracing delivered

Water quality

Number and location of water pollution incidents reported to the Environment Agency
across Greenwich annually

Water quality status of water bodies across Greenwich

Open space and nature

Metres of main river improved and restored across Greenwich

Biodiversity Net Gain delivered across Greenwich

RBG Response

Baseline

The Scoping Report was a snapshot at the time of preparation, and has not been updated. The Plans and Programs recommended for addition to the Baseline have been reviewed in the preparation of the draft Regulation 19 Local Plan, as noted in Section 2.2 of the IIA.

Monitoring

The monitoring framework within the IIA and the Local Plan have been amended. Where considered appropriate and achievable to measure, the suggested indicators have been incorporated.

Consultee

Historic England

Is the baseline information within the Scoping Report accurate and complete?

We recommend that the following relevant plans and programmes are added:

- UNESCO, Guidance and Toolkit for Impact Assessments in a World Heritage Context
- Maritime Greenwich World Heritage Site Management Plan
- The Historic Environment in Local Plans Historic Environment Good Practice Advice in Planning: 1

There are 17 (rather than 14) assets on the Heritage at Risk Register (including 13 listed buildings, 3 conservation areas and one registered Park and Garden)

Do the IIA objectives reflect the key priorities for Greenwich?

The phrase ‘historic environment’ is a broader term that encompasses other heritage assets such as parks and gardens, landscapes, and archaeological sites that should be considered through the IIA process.

We suggest the following amendment to IIA Objective 8: Sustain and enhance the Royal Borough's culture and built heritage Sustain and enhance Royal Greenwich's built historic environment and townscape, ensure design is of an exemplary standard and that respects local distinctiveness

Is the methodology for assessing impacts robust and appropriate?

We note that site allocations have not been individually assessed against the IIA Framework. From a heritage perspective, it is important that the Council has adequately and proportionately assessed the potential heritage impacts of individual site allocations where relevant. Provided that the Local Plan's evidence base in combination) provides a sufficient framework to understand and mitigate the likely impacts of site allocations on heritage we would be satisfied.

Are there any additional impacts (positive or negative) that should be considered?

No comment

Do you agree with the conclusions drawn in the IIA regarding the preferred development strategy?

No comment

Is there anything else you would like to tell us about the Integrated Impact Assessment?

Scoping Report: The IIA Report could draw out some of the key sustainability issues relevant to the Local Plan's spatial strategy more clearly. For heritage, this might include how to deliver the proposed growth over the plan period in a way that preserves or enhances the historic environment reflecting, in

particular, the international importance of the World Heritage Site and the impact proposed tall buildings can have on the setting of heritage assets.

RBG Response

Baseline: The Scoping Report was a snapshot at the time of preparation, and has not been updated. The Plans and Programs recommended for addition to the Baseline have been reviewed in the preparation of the draft Regulation 19 Local Plan, as noted in Section 2.2 of the IIA: The details regarding the number of entries on the Heritage at Risk Register was correct based on the list dated 2024. It is noted and acknowledged that there are 17 entries on the Register dated 2025. The most recent Register will be used in the application of Policy DH4, Heritage Assets.

Objectives: IIA Objective 8 has been amended as suggested and the IIA has considered the impact on the wider historic environment in its assessment of policies. The Local Plan addresses the broader historic environment.

Methodology: It is considered that the approach taken to site allocations within the IIA is appropriate and proportionate. The IIA explains that individual site allocations have not been assessed separately because all development proposals must accord with the Local Plan's policy framework, which has been comprehensively appraised, including against the heritage objective, and therefore provides the primary mechanism for managing impacts. In addition, site allocations themselves contain detailed, site-specific policy requirements and constraints, explicitly including heritage assets, conservation areas, views and World Heritage Site considerations, ensuring that heritage sensitivities are identified and addressed at the plan-making stage. This is supported by the wider evidence base, including the Characterisation Study and Heritage Assessment, which provides a detailed, place-based analysis of heritage significance, key views and the susceptibility of different areas to change, including from tall and large-scale development. This is further supplemented at application stage through requirements for project-level assessments, including Environmental Impact Assessment and, where relevant, Heritage Impact Assessment, providing a further layer of detailed, site-specific analysis and mitigation. Taken together, the IIA, Local Plan policies, site allocation requirements, supporting evidence base and development management processes provide a robust and sufficient framework to understand, assess and mitigate the potential heritage impacts of individual sites.

Scoping Report: The IIA identifies and assesses the key sustainability issues relevant to the spatial strategy, including heritage and the potential impacts of tall buildings, through its dedicated heritage objective and its appraisal of spatial options, which demonstrates that the preferred place-based growth strategy performs well in balancing growth with the protection of heritage assets, including the World Heritage Site. The IIA also recognises potential tensions arising from growth and highlights that these are mitigated through the Plan's policy framework. This is reflected in the Local Plan itself, which provides a robust response through a strong suite of design and heritage policies.

Consultee

Natural England

Is the baseline information within the Scoping Report accurate and complete?

No comment

Do the IIA objectives reflect the key priorities for Greenwich?

No comment

Is the methodology for assessing impacts robust and appropriate?

No comment

Are there any additional impacts (positive or negative) that should be considered?

No comment

Do you agree with the conclusions drawn in the IIA regarding the preferred development strategy?

No comment

Is there anything else you would like to tell us about the Integrated Impact Assessment?

Local Plan Advice Note Supplied

RBG Response

The Local Plan Advice Note has been considered in the preparation of the Local Plan

Appendix 2:

Assessment of Policies

Appendix 2: Assessment of Policies

Assessment of 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	+	+	++	+	+	+	+	++	++	+	+
P2 Greenwich Peninsula	+	0	++	+	+	+	+	+	+	++	+
P3 Charlton	++	++	++	++	+	+	+	+	+	++	+
P4 Woolwich	+	+	++	+	+	+	+	++	++	+	+
P5 Thamesmead and Abbey Wood	++	+	++	++	++	+	+	+	++	+	+
P6 Plumstead and Shooters Hill	+	0	+	+	0	0	+	+	+	0	+
P7 Eltham, Avery Hill, Coldharbour and New Eltham	0	+	+	+	+	0	0	+	+	0	+
P8 Kidbrooke and Middle Park	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 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 and in accessible locations, supported within the policy.

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

Likely Significant Effect: Major positive impact on sustaining and enhancing Royal Greenwich's 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, Greenwich Park, the World Heritage Site (including associated Conservation Areas) and the protection of Greenwich Market as a unique community asset. The policy also strengthens protection of the significance and setting of the Maritime Greenwich World Heritage Site, and requires protection of views and settings of heritage assets, including those within Conservation Areas and the World Heritage Site buffer zone.

- **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. This includes strengthened policy direction for East Greenwich District Centre, reflecting its role as a key community hub with enhanced expectations for mix of uses, active frontages and supporting infrastructure. The policy supports a diverse mix of uses including culture, retail, leisure, entertainment, the visitor economy, and the night-time economy, and provides flexible and creative employment spaces.

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. The policy further strengthens this by supporting improvements to the quality, safety and continuity of 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, green and blue infrastructure, environmental resilience, and improved public realm across the area. The policy supports improvements to accessibility, wayfinding, and public spaces, as well as enhanced landscaping, active frontages and public realm improvements, particularly within East Greenwich and town centres. Regeneration of the Deptford Creek corridor will enhance public access, visual amenity and the quality of the riverside environment.

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

Likely Effect: Minor positive impact with the revised policy introducing more explicit requirements for the provision of social and community infrastructure, open space and active frontages within East Greenwich District Centre, alongside enhanced public access and recreational use of the River Thames and Deptford Creek. These changes strengthen the delivery of inclusive and accessible environments for communities within these areas.

- **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 network, and enable improved access to nature, including through the River Thames and Deptford Creek corridors.

- **Objective 6: Accelerate sustainable, climate-resilient development**

Likely Effect: Minor positive impact through strengthened support for climate resilience and environmental adaptation. The policy promotes green and blue infrastructure, transit-oriented development to reduce car dependency, and requires ecological

enhancement and improved access along Deptford Creek and the River Thames. These measures contribute to flood resilience, urban cooling and sustainable development patterns.

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

Likely Effect: Minor positive impact through the protection and enhancement of green and blue infrastructure and ecological networks. Development in the Deptford Creek/Greenwich Riverside Opportunity Area is required to enhance ecological quality and nature conservation value and improve visual amenity.

- **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. The policy also encourages a mix of retail, leisure, cultural and employment uses, including the night-time economy, and supports the visitor economy and provision of flexible and creative employment space, particularly within key town centres such as Greenwich and Blackheath. It also provides bespoke direction for the regeneration of the Deptford Creek/Greenwich Riverside Opportunity Area, supporting the delivery of commercial uses, jobs and improved public realm, contributing to economic growth across the area.

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

Likely Effect: Minor positive impacts through encouraging active travel uses, enhancing public realm and green and blue infrastructure, and supporting sustainable development to support new jobs and homes, contributing to better health and wellbeing outcomes.

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 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 6: Accelerate sustainable, climate-resilient development**

Likely effect: Minor positive impact due to the inclusion of the Greenwich Peninsula Heat Network which will contribute to decarbonization on the Peninsula.

Objective 7: Improve environmental resilience and resource efficiency

Likely effect: Minor positive impact due to a coordinated approach to tall buildings, ensuring they contribute positively to placemaking and townscape, whilst responding to issues such as wind tunnelling and microclimate.

• **Objective 8: Sustain and enhance the Royal Borough's culture and 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 introducing clear delivery mechanisms to improve public transport accessibility, including the delivery of a new riverside bus route, enhanced walking and cycling infrastructure, and exploration of a future river boat stop, reducing car dependency and connecting new and existing communities, while strengthening links to the River Thames and enhancing the Thames Path

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

Likely Significant Effect: The policy supports the comprehensive redevelopment and transformation of underutilised industrial estates and retail parks into vibrant mixed-use quarters, delivering new high-quality public realm, a linear park, enhanced riverside access and improved integration with 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 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 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 6: Accelerate sustainable, climate-resilient development**

Likely Effect: The policy introduces explicit requirements relating to climate resilience and flood risk management, including engagement with the Environment Agency and alignment with the Thames Estuary 2100 Plan, as well as safeguarding land and access for future flood defence infrastructure. These provisions improve the Borough's resilience to climate change impacts.

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

Likely effect: Policy P3 is expected to have a positive effect on environmental resilience and resource efficiency, supported by its strong approach to flood risk management (including alignment with the Thames Barrier and TE2100 Plan), protection and enhancement of green infrastructure, and promotion of sustainable transport to reduce car dependency. The safeguarding of waste sites and protection of strategic wharves for river-based freight further contribute to resource efficiency and sustainable waste management capacity within the borough. However, these benefits are moderated by the scale of growth and continued industrial and logistics activity, which may increase emissions and resource use.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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 (including Woolwich Dockyard) to deliver high-quality homes across a range of tenures, including affordable housing. Transit-orientated and sustainable growth are supported, alongside regeneration of sites to delivery homes.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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. The policy further strengthens heritage protection through explicit reference to Conservation Areas, key views, townscape qualities, and integration with surrounding heritage assets.

- **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, including meanwhile uses to activate vacant and underused spaces, and a diversified evening and night-time economy that fosters community cohesion and strengthens its borough-wide and London-wide significance. The policy further strengthens this through supporting the growth of creative industries and cultural spaces, alongside increased footfall and dwell time, active frontages, high-quality landscaping and the provision of social and community infrastructure within the town centre.

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. The policy also supports improvements to the quality, safety and continuity of the Thames Path and connectivity to the riverside.

- **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. This is strengthened through a comprehensive approach to Woolwich Riverside, including improved permeability, enhanced visual and physical connections, and delivery of high-quality public realm and accessible open spaces.

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

Likely Significant Effect: Minor 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. The revised policy introduces more explicit requirements for high-quality public realm, open spaces and social and community infrastructure, particularly within Woolwich Town Centre and regeneration areas.

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

Likely Effect: The revised policy introduces explicit requirements for the provision of open space, including accessible open space within Woolwich Riverside, and promotes multifunctional green infrastructure across the area. These measures support biodiversity, recreational use and community access, representing a material strengthening of the policy support for open space provision.

- **Objective 6: Accelerate sustainable, climate-resilient development**

Likely Effect: The policy introduces explicit support for climate resilience through climate-resilient design, integration of green infrastructure, and riverside interventions. Improvements to Woolwich Riverside include climate resilience measures, alongside support for reduced car dependency through transit-oriented development.

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

Likely Effect: The policy includes explicit support for biodiversity enhancement and increased provision of multifunctional green infrastructure, alongside improvements to environmental quality, including within Woolwich Riverside. These measures contribute to enhanced environmental resilience and resource efficiency.

- **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, alongside growth in creative industries and cultural sectors.

- **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. Additional benefits arise from enhanced access to the riverside, open spaces, and improve public realm quality across Woolwich.

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 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. This effect is significantly strengthened by Thamesmead's designation as a 'next generation New Town', which will provide a comprehensive, masterplan-led framework for large-scale, long-term housing delivery.

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

Likely Significant Effect: Major positive impact through the delivery of a new town supporting mixed and balanced communities through promoting sustainable development and provision of new jobs, homes, a revitalised town centre and social infrastructure 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 Significant Effect: Major positive impact due to the scale of proposed open space provision, including a major new riverside park and integration of blue infrastructure which represents a significant enhancement to recreational and ecological assets

- **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 6: Accelerate sustainable, climate-resilient development**

Likely Effect: The policy introduces explicit requirements relating to climate resilience and flood risk management, including alignment with the Thames Estuary 2100 Plan and addressing surface water management constraints within the Marsh Dykes catchment.

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

Likely Effect: The policy should have a positive impact due to its emphasis on integrating blue and green infrastructure, enhancing biodiversity, and promoting sustainable transport (including DLR extension, bus transit, and active travel) to reduce car dependency. The policy also strengthens resilience through support for tidal flood defences (aligned with the Thames Estuary 2100 Plan) and requirements to address strategic surface water drainage constraints. The presence and safeguarding of waste sites within the SIL, alongside the protection and intensification of industrial land, contribute to maintaining waste management capacity and efficient use of land. However, these benefits are tempered by the scale of planned growth and industrial intensification, which may increase resource demand and emissions

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact with policy encouraging development to contribute to inclusive and sustainable communities.

Objective 7: Improve environmental resilience and resource efficiency

Likely effect: Minor positive impact due to clause on urban greening in public realm and development sites, with encouragement of links to wildlife corridors and green links, which will improve biodiversity and therefore environmental resilience.

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

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

Likely Effect: Minor positive impacts through encouraging creation of active travel routes, and urban greening on development sites and in public realm, promoting active travel to benefit physical and mental well-being and improve the attractiveness of the area.

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

Likely Effect: Minor positive impact as the policy supports the protection of the area's green character and open spaces which contribute to its distinctive character.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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 4: Build resilient and inclusive communities**

Likely Effect: Minor positive impact with policy encouraging development to contribute to inclusive and sustainable communities.

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

Likely Effect: The policy supports development that conserves and enhances natural habitats, biodiversity and water bodies, while also preserving the accessibility, operational functionality, ecology and visual amenity of parks and other public open spaces

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

Likely effect: Minor positive impact with policy supporting flood risk management and increased biodiversity within the River Quaggy corridor, contributing to wider environmental resilience.

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

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

Likely effect: Minor positive impact with policy supporting improved amenity and environmental quality within the River Quaggy corridor, contributing to more attractive environments that can support wellbeing.

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 Purpose Built Student Accommodation	+	0	++	+	+	0	0	0	+	0	+
H6 Housing with Shared Facilities	+	0	++	+	+	0	0	0	+	0	+
H7 Supported and Specialist Accommodation	0	0	+	+	0	0	0	0	0	0	++
H8 Small Sites and Subdivisions	0	0	++	0	0	0	+	+	0	0	++
H9 Extensions	0	0	+	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 also ensures that existing housing is safeguarded as the net loss of residential accommodation is resisted. 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 of affordable housing need.

- **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.

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

Likely Significant 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. Additionally, the requirement to provide public open spaces in locations of open space deficiency may make neighbourhoods more attractive and provide physical activity or wellbeing benefits.

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 locations 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 BtR schemes in well-connected areas with easy access to shops, services and open spaces, in addition to the requirement to maximise public open 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, supporting a mix of dwelling sizes meeting local housing needs. The policy clause preventing overconcentration of similar uses will also contribute to balanced neighbourhoods which are inclusive to lots of different groups, however this will only impact well-connected locations such as town centres rather than having cross-borough impacts.

- **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 public open space provision in addition to 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.

Policy H5: 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. The requirement to provide some conventional self-contained housing units further promotes housing choice and the requirement for a Cumulative Impact Assessment ensures the delivery of PBSA does not undermine the Council's priority to meet the borough's identified need for conventional housing, including affordable and family-sized homes, for which need is greatest.

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 locations 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 locations with access to shops, 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 in net developable area to provide some conventional self-contained housing units on the same site in a separate block or area in order to support long-term housing need in addition to transient housing need.

- **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 PBSA schemes in well-connected areas with access to open spaces, in addition to the requirement to maximise provision of on-site public open 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.

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

Likely 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.

Policy H6: Housing with Shared Facilities (Houses in Multiple Occupation)

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 and requiring delivery of conventional housing on sites with a net developable area of 0.5 ha or greater in addition to the co-living units. The policy will increase housing supply, ensure good design, and promote housing choice. The policy will also provide protection against overconcentration of similar uses, helping to provide balanced neighbourhoods with a mix of housing types meeting different needs. The policy also ensures that homes under 130sqm are retained and cannot be converted into HMOs, which will help to meet the local need for family sized homes. As well as this, the policy also requires that HMOs are retained (other than for certain circumstances) which will help to meet local community need.

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 HMOs are car-free (when in controlled parking zones) and that HMOs provide one cycle parking space per occupant. They must also be located in areas that are well-connected to local services by walking, cycling, and public transport. In terms of large scale purpose built shared living, the policy 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 easy access to shops, services and open spaces.

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

Likely effect: The policy ensures that homes under 130sqm are retained and cannot be converted into HMOs, which will help to meet the local need for family sized homes. The policy also ensures that HMOs are retained (other than for certain circumstances) which will help to meet local community 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, such as HMOs. In terms of LSPBSL, the policy will support the development of neighbourhoods with access to healthcare and community facilities through the requirement to site LSPBSL schemes in well-connected areas with access to shops, services and open spaces, in addition to the requirement to provide public open space on-site in locations of open space deficiency. It will promote social inclusion and reduce inequalities in the Royal Borough through requiring applications for sites with a net developable area of 0.5 ha or greater 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 public open space in locations of open space deficiency.

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

Likely effect: The policy directs Large-scale purpose-built shared living schemes 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: 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. The policy will also 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.

Policy H7: 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. Additionally, requirements to provide green space on site for several development types, and encouraging this for other schemes, and ensuring schemes provide appropriate access to public transport, shops, services, green spaces and community facilities for their intended residents, will promote active living, improve access to appropriate facilities and improve mental wellbeing.

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 H8: Small sites and subdivisions

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, well-designed and respects local character.

- **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. It also seeks that small sites provide, or make appropriate financial contributions towards infrastructure where necessary to mitigate the impacts of the development, which will improve the lives of residents and provide access to social and community facilities.

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 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 H9: Extensions

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: By taking a positive approach to extensions there is potential to deliver enlarged and/or additional residential units to meet local housing needs. Its emphasis on high-quality, context-sensitive design and amenity protection ensures that any new or adapted homes are sustainable, well-designed and contribute positively to the existing housing stock.

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

Likely Effect: This policy enables the delivery of enlarged or additional residential units that contribute to meeting local housing needs, thereby improving access to safe and secure homes. At the same time, its detailed design and amenity criteria protect the character of neighbourhoods and safeguard daylight, privacy and outlook, helping to create attractive, liveable environments that support residents' health, wellbeing and quality of life.

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 to meet the housing need of the Gypsy and Traveller community.

- **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 the provision of amenity space and play space, accessible housing, and enhanced environmental comfort through improved natural light, ventilation and mitigation of overheating.

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 housing developments that are functional, accessible and adaptable to changing needs over time. It also contributes to climate resilience through passive design measures, including improved ventilation and mitigation of overheating, while maintaining strong requirements for housing quality, including compliance with space standards and accessibility provisions.

- **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. This is supported through clear requirements for adaptable and wheelchair user dwellings across all tenures, contributing to inclusive and accessible living environments.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: The policy will have a positive impact on climate resilience through supporting passive design measures, including reducing overheating and maximising natural ventilation and environmental comfort.

- **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, supporting resource efficiency at the building level.

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	++	++

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 through explicit requirements for sustainable freight and by 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 6: Accelerate sustainable, climate-resilient development**

Likely effect: Positive contribution to carbon reduction targets, through land optimisation, and explicit requirements for sustainable freight, outweighing any potential negative impact due to emissions from industrial processes.

- **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.

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.

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**

Likely 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 major and district 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. Quantified requirements for affordable workspace provide a clear and enforceable mechanism for delivering inclusive economic growth.

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.:

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: The visitor economy	0	0	0	+	0	0	0	++	++	+	+
TC4 Culture and evening and night-time economy uses	0	+	0	+	0	0	0	0	++	++	+
TC5 Markets, temporary events and meanwhile uses	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	++
TC8 Public Houses	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 visitor, 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. The revised policy provides clearer and more detailed direction on the role and function of centres within the hierarchy, including the reclassification of Greenwich as a Major Centre and strengthened centre-specific strategies to support growth, diversification and long-term vitality. It also places greater emphasis on the visitor economy and evening and night-time economy across key centres.

- **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 visitor, daytime and nighttime economy provision within key centres. Positive impact on diversifying employment opportunities and supporting local businesses through encouraging a diverse range of commercial, creative, cultural and visitor economy uses to support local diversity and community needs, and supporting temporary ('meanwhile') uses of vacant/underutilised properties. The revised policy strengthens this through clearer investment priorities across the hierarchy and greater emphasis on regeneration, mixed-use development and the role of centres as key economic locations.

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. This is further strengthened through more explicit support for improving connectivity within and between centres, including enhanced active travel routes and access to public transport infrastructure.

- **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. The revised policy also strengthens this through more explicit support for high-quality public realm, environmental quality and place-based improvements within individual centres.

- **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 in accessible and sustainable locations.

- **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. The policy further supports inclusive communities through improved access to local services, community uses and walkable centres aligned with the 15-minute neighbourhood concept.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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 and recognises the role of heritage and cultural assets in defining centre identity.

- **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 accessible local services, pop-up events and outdoor activations, a thriving nighttime economy and mitigating any adverse

impacts including on safety and anti-social behaviour. Additional benefits arise from enhanced access to services and improved quality of place within centres through strengthened policy direction on connectivity and place-making.

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. The revised policy strengthens this through clearer and more decisive policy wording, including explicit resistance to proposals that would have an unacceptable impact on the vitality and viability of town centres, and updated thresholds for impact assessment.

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. This is reinforced through the continued application of the town centre first approach, supporting access to services within walkable and accessible centres.

- **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. The revised policy strengthens this by providing clearer direction on managing edge-of-centre and out-of-centre proposals, including stronger wording to prevent development that would undermine investment, economic activity and the vitality of centres.

Policy TC3: The visitor economy

Major Positive Effect:

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

Likely Significant Effect: Preservation and enhancement of local heritage and identity through strengthened protection of arts, cultural and tourism uses, including requirements for re-provision, continuity of use and improved quality of facilities. The policy promotes context-sensitive growth and reinforces the role of cultural infrastructure in sustaining historic townscape and local character.

- **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, the night-time and visitor economy, and supports tourism and cultural infrastructure as key components of town centre vitality. The policy introduces stronger protection for cultural uses and requires large-scale developments to incorporate new cultural venues or event spaces, further enhancing the role of town centres as cultural and visitor destinations.

Minor Positive Effect:

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

Likely Effect: Arts, cultural and tourism uses encourage community participation and help build a stronger sense of belonging. Strengthened protection of cultural infrastructure, including requirements for continuity and re-provision, supports long-term access to community and cultural facilities.

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

Likely Significant 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. Strengthens the role of tourism, culture and visitor-related development in regeneration and employment. The inclusion of tourism uses and expansion to Opportunity Areas broadens the economic benefits and supports diversification and growth across the borough.

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

Likely Effect: Minor positive effect through improved safety and management of larger visitor and cultural venues, including requirements for public protection and security measures. The policy also supports vibrant and active environments that contribute to wellbeing and perceptions of safety.

Policy TC4: 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 designated Evening and Night-time Economy (ENTE) destinations within the 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. The revised policy strengthens this through a clearer spatial focus on ENTE destinations aligned with the London Plan, alongside enhanced support for cultural and creative industries, performance spaces and public space activation, including events and meanwhile uses.

- **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. The revised policy reinforces this through clearer emphasis on cultural and creative industries, ENTE destinations as key economic hubs and the visitor economy, supporting employment, enterprise and economic diversification.

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. The revised policy further clarifies the role of public spaces in supporting evening civic and cultural activity.

- **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. This is strengthened through a clearer emphasis on inclusive programming, community engagement and provision of spaces for cultural organisations within ENTE destinations.

- **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 hours. The revised policy maintains this approach through continued requirements for management plans and mitigation of impacts such as noise, disturbance and anti-social behaviour to protect residential amenity and wellbeing.

Policy TC5: Markets, temporary events and meanwhile uses

Major Positive Effect:

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

Likely Significant Effect: Major positive effect in that markets, temporary events and meanwhile uses support the vitality and viability of town centres, creating a diverse mix of goods, services and cultural activities and contributing to the activation of the public realm. The policy supports local businesses, entrepreneurs and community initiatives, strengthens the evening and visitor economy, and

reinforces the role of town centres as vibrant cultural and economic destinations. The inclusion of heritage protection for markets further enhances their contribution as cultural assets.

Minor Positive Effect:

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

Likely Effect: Minor positive effect through activation of public spaces and underused sites, increasing footfall, improving safety and supporting investment in the public realm. The policy promotes high-quality, accessible and well-connected spaces and requires maintenance of public realm quality.

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

Likely Effect: Minor positive effect by supporting inclusive and vibrant community spaces through markets, events and meanwhile uses. These uses provide opportunities for community participation, local enterprise and cultural expression, contributing to social cohesion and local identity.

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

Likely Effect: Minor positive effect through the introduction of an explicit requirement to conserve and celebrate the heritage and historical significance of markets, reinforcing local identity and contributing to the borough's cultural and townscape character.

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

Likely Effect: Minor positive effect in supporting local businesses, start-ups and the creative sector through markets, temporary events and meanwhile uses. The policy promotes economic diversification, supports town centre regeneration and provides opportunities for flexible and interim employment.

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

Likely Effect: Minor positive effect through the creation of vibrant, active and safe environments. The policy supports health and wellbeing by promoting access to healthy food, active lifestyles and increased activity in public spaces, improving perceptions of safety and community wellbeing.

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. The revised policy strengthens this effect through a more explicit focus on reducing the consumption of foods high in fat, salt and sugar and reducing gambling-related harm, supported by a strengthened evidence base and the introduction of a requirement for Health Impact Assessments.

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. The revised policy retains these controls and strengthens the management of delivery operations and amenity impacts, supporting safe and accessible streets.

- **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. The policy strengthens this effect through a clearer emphasis on addressing health inequalities, protecting children and vulnerable groups, and tackling gambling-related harm.

- **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. The revised policy maintains this approach, with a clearer emphasis on supporting a balanced mix of uses and the long-term vitality and function of town centres.

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 neighbourhoods and access to social and community facilities, which in turn will enhance social inclusion and reduce inequalities across the Royal Borough.

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

Likely Significant Effect: Major positive effect since supporting the provision of and investment in social and community infrastructure will help to reduce inequalities of access. The provision of public toilets, including provision for changing spaces in busy locations, will play an important role in supporting inclusive, safe and accessible environments, reducing barriers to participation and contributing positively to health and wellbeing outcomes

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 since social and community infrastructure within town centres will increase footfall and support their regeneration and vitality.

Policy TC8: Public houses

Major Positive Effect:

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

Likely Significant Effect: Major positive effect through the protection of public houses with heritage, cultural and social value. The policy requires retention of their design, character and contribution to streetscape, supporting conservation of the historic environment, local identity and distinctiveness.

Minor Positive Effect:

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

Likely Effect: Minor positive effect through retention of buildings that positively contribute to streetscape and local character, supporting the quality and attractiveness of the public realm.

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

Likely Significant Effect: Minor positive effect by protecting public houses as community assets that support social interaction, cultural activity and community cohesion.

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

Likely Effect: Minor positive effect by supporting vitality and diversity in town centres and neighbourhood areas, including contribution to the evening economy.

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

Likely Effect: Minor positive effect through support for local hospitality businesses, employment and associated economic activity.

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

Likely Effect: Minor positive effect by retaining valued social spaces that support interaction, inclusion and community wellbeing.

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. The revised policy maintains this approach through continued emphasis on design-led intensification and high-quality development.

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely Significant Effect: Major positive impact in that development across the borough should 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. The policy continues to support climate-responsive design, although there is a slight reduction in prescriptive wording.

- **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. These requirements are retained in the revised policy, continuing to support environmental performance and resource efficiency.

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. The revised policy maintains strong support for walkable, connected environments.

- **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. The revised policy strengthens this through an expanded focus on user experience and high-quality place-making.

- **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. The revised policy strengthens this through new emphasis on safety and crime prevention, including Secured by Design principles and engagement with Designing Out Crime Officers.

- **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. The revised policy continues to support urban greening and ecological enhancement.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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. The revised policy maintains this strong heritage-led approach.

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

Likely Effect: Minor positive effect in development should 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. The revised policy significantly strengthens this through the introduction of a requirement for Health Impact Assessments and a more explicit focus on health, safety and wellbeing outcomes.

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. The revised policy maintains this approach through a continued emphasis on design-led intensification and efficient use of land, although the explicit requirement for tall buildings to exceed affordable housing requirements has been replaced with a broader requirement to demonstrate significant public benefits.

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. The revised policy maintains these requirements and reinforces the importance of high-quality, inclusive public realm and place-making.

- **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. The revised policy continues to support social cohesion and inclusive communities, with additional flexibility in how housing mix and design outcomes are achieved.

- **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 and deliver high standards of sustainable design and construction. The revised policy maintains these principles, although there is a slight reduction in prescriptive policy wording.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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. The revised policy maintains this strong heritage-led approach, with clearer requirements for site-specific justification of height and design.

- **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. The revised policy maintains this effect through continued support for density in appropriate locations.

Mixed Effect:

- **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. The revised policy retains this balance, with continued requirement for assessment and mitigation of environmental impacts.

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 (including through 'secured by design'), 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 and should not incorporate gated communities.

- **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 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 heritage**

Likely Significant Effect: Major positive impact on sustaining and enhancing Royal Greenwich's 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. The revised policy strengthens this approach through clearer alignment with national policy, a more consistent emphasis on conserving and where possible enhancing the significance of heritage assets, and improved clarity in assessing harm, demolition and adaptive reuse.

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. The revised policy reinforces this through clearer integration of heritage in placemaking and stronger emphasis on high-quality design and the enhancement of setting and public realm quality.

- **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. The revised policy strengthens this through clearer policy wording requiring that development proposals must preserve, and where possible enhance, the significance of historic parks and gardens, with clearer justification tests for any harm in accordance with national policy. This includes continued protection of public access and enjoyment.

Policy DH5: Maritime Greenwich World Heritage Site

Major Positive Effect:

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

Likely Significant Effect: Major positive impact on sustaining and enhancing the Borough's culture and 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 ensure that harm is avoided or minimised and appropriately justified, including cumulative impacts. The revised policy strengthens this through clearer emphasis on conserving and, where appropriate, enhancing Outstanding Universal Value, including its attributes, authenticity and integrity, and through more robust requirements for Heritage Impact Assessments aligned with recognised methodologies.

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. The revised policy strengthens this through additional emphasis on improving accessibility, interpretation and visitor experience, while ensuring these improvements remain sensitive to the historic environment.

• **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. The revised policy maintains this approach through continued protection of landscape and open spaces that contribute to the Outstanding Universal Value and setting of the World Heritage Site.

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. This effect remains as the revised policy continues to prioritise protection of Outstanding Universal Value, including its setting, views and skyline, which may constrain development capacity and building heights in sensitive locations.

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 the viewer's ability to recognise and appreciate landmarks, have improved access to viewing locations, landscaping and interpretation, and sensitive public realm improvements. The revised policy strengthens this through clearer and more robust requirements for Townscape and Visual Impact Assessments, including the need for proportionate assessment and accurate visual representations, as well as continued emphasis on improving accessibility, interpretation and the experience of views.

- **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. The revised policy maintains this approach and reinforces the importance of maintaining and enhancing visual connections to open spaces through clearer design and assessment requirements.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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. The revised policy strengthens this through clearer integration with the protection of the Outstanding Universal Value of the World Heritage Site, more explicit consideration of cumulative impacts, and stronger wording requiring conservation areas to conserve or enhance character and appearance, including views that contribute to their significance.

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. The revised policy strengthens this through clearer and more comprehensive controls over advertisements and signage, including new requirements for freestanding structures such as digital displays and telecommunications hubs, stronger restrictions on solid and perforated shutters, and more explicit management of visual clutter, cumulative impacts and pedestrian safety.

- **Objective 8: Sustain and enhance the Royal Borough's culture and 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. The revised policy strengthens this through clearer requirements to conserve and, where appropriate, enhance the significance of heritage assets and their settings, including key views, alongside more explicit controls on the siting, design and cumulative impact of advertisements and signage.

- **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. The revised policy maintains this effect and reinforces it through clearer design expectations, improved management of visual clutter, and additional controls to ensure advertisements and freestanding signage contribute positively to the vitality and attractiveness of town centres.

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. The revised policy maintains and strengthens this through clearer emphasis on connectivity, including improved integration with key routes such as river crossings and strategic walking and cycling infrastructure.

- **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 deliver 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. The revised policy strengthens this through clearer emphasis on inclusive, safe and accessible public realm and improved integration with wider green and blue infrastructure networks.

- **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. The revised policy maintains and reinforces this approach, particularly through clearer focus on accessibility and connectivity of riverside open spaces.

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

Likely Effect: Minor positive impact in that policies seeks to ensure environmental resilience and biodiversity, including in 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. The revised policy maintains this approach with clearer articulation of environmental resilience and biodiversity requirements.

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

The revised policy reinforces this through clearer integration with wider heritage policies and continued protection of historic riverfront character and setting.

- **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. The revised policy strengthens this through clearer emphasis on inclusive, accessible and safe riverside environments.

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	+
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	++
EN6 Managing flood risk	0	0	+	+	0	++	++	0	0	0	+
EN7 Sustainable drainage	0	0	+	0	+	++	++	0	0	0	+
EN8 Strategic Waste Management	+	0	0	0	0	0	++	0	0	+	+

Policy EN1: Green and Blue Infrastructure

Major Positive Effect:

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

Likely significant effect: This policy will play a strategic role in protecting, enhancing and expanding the Borough's green and blue infrastructure network, delivering significant benefits for biodiversity and ecology. This includes protecting green links / footpaths, food growing spaces / allotments and trees, and encouraging new provision of these assets where possible and appropriate. Through the application of Urban Greening Factor requirements across qualifying developments, the policy will secure widespread urban greening and ecological enhancement across the Borough. As the primary strategic environmental policy, EN1 provides a framework for integrating multifunctional green and blue infrastructure into development.

- **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, and localised cooling effects 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 qualifying developments to meet an Urban Greening Factor, the policy aims to spread these benefits to all communities where development takes place within the Royal Borough.

Minor Positive Effect:

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

Likely effect: Green links, footpaths and river corridors will enhance walking and cycling connectivity and provide attractive alternatives to car travel, supporting modal shift

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

Likely effect: Through the promotion of new tree lined streets within new developments, the policy will improve the design, character and identity of public realm spaces and improve their cooling function in hot weather, 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.

- **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 urban greening, food growing spaces/allotments and trees on development sites and in the public realm, carbon uptake by plants will increase. It will also help to ensure climate resilience as through encouraging developers to plant trees and utilise sustainable drainage systems this provides some protection against the urban heat island effect, flooding and habitat degradation.

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

Likely effect: The promotion of urban greening and tree planting could reduce health inequalities because green infrastructure can improve communities' mental and physical health. The promotion of new allotment or food growing spaces, and improving the accessibility and usability of blue infrastructure, increase opportunities for active living, socialisation and production of healthy food.

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. The policy also aims to address open space deficiencies through requiring new developments to maximise open space provision in areas of open space deficiency.

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 in areas of open space deficiency, this policy enhances accessibility and usability of public spaces. The policy also supports improved provision of ancillary facilities in public open spaces such as cafes, toilets, baby changing facilities and children's play infrastructure which contribute to safer, more inclusive and multifunctional environments that encourage active travel, including walking and cycling trips to and through open spaces, and support social interaction.

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

Likely effect: The policy safeguards open spaces, providing opportunities for recreation and social connection which support community wellbeing. 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 drainage features, multifunctional spaces, connections to the wider green and blue infrastructure network, and green and blue infrastructure features 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 supports the provision of accessible, high-quality open spaces that encourage physical activity and social interaction, including facilities such as cafes, toilets, baby changing facilities and children's play equipment. 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. The policy also aims to address open space deficiencies through requiring new developments to maximise open space provision in areas of open space deficiency, improving public access to them and thus promoting active living and attractive neighbourhoods.

Policy EN3: Biodiversity

Major Positive Effect:

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

Likely significant effect: By mandating biodiversity improvements, the policy will improve biodiversity in the borough and promote urban greening. The policy also protects nature sites with protective designations, some of which are open to the public, 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 requiring qualifying developments to maximise biodiversity net gain beyond the statutory 10% requirement where feasible and appropriate and prioritise on-site delivery. It will also protect designated nature sites from potentially impactful development and encourage take up of small-scale biodiversity features such as swift bricks as well as naturalisation of blue infrastructure features.

Minor positive effect:

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

Likely effect: The policy protects designated nature sites so that they can be preserved and enhanced. Where these sites are publicly accessible, they will continue supporting community wellbeing, recreation, and social connection. Protecting their ecological quality and character also helps to maintain their function and value as community assets.

- **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, biodiverse environments which absorb carbon from the air.

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

Likely effect: minor positive impact by preserving and enhancing natural, biodiverse environments which provide opportunities for physical exercise and improve mental well-being. Requiring qualifying developments to maximise BNG will benefit residents, promote health and improve the attractiveness of neighbourhoods.

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, thereby improving occupants' quality of life and ensuring developments do not harm mental and physical wellbeing.

Minor Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely effect: Supports climate resilience through managing overheating, noise and environmental stressors and improving overall environmental adaptability.

Policy EN6 Managing flood risk

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on lowering the impacts of flood risks 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 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: positive effect on promoting flood resilient design that ensure a safe residential environment.

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

Likely effect: the policy contributes to community resilience by reducing vulnerability to flood events and safeguarding critical infrastructure.

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

Likely effect: positive effect on ensuring vulnerable uses are located in areas at lowest risk of flooding, thus reducing damage and danger to life and property.

Policy EN7 Sustainable drainage

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact on 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 3: Boost the supply of high-quality housing of all types and tenures to address a range of needs**

Likely effect: positive effect on promoting flood resilient design that ensure a safe residential environment.

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

Likely effect: SuDS, where appropriately designed, can contribute to the provision and enhancement of green and blue infrastructure within open spaces. They can improve biodiversity value, support natural drainage functions and enhance the quality, usability and visual attractiveness of open spaces and can help create more diverse, accessible and functional landscapes that support recreation and local amenity.

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

Likely effect: positive effect on ensuring multi-benefit sustainable drainage systems are delivered, thus reducing damage and danger to life and property while improving communal space and water efficiency in some cases.

Policy EN8 Strategic Waste Management

Major Positive Effect:

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

Likely significant effect: the safeguarding of waste sites supports 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 priorities movement by rail and river.

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

Likely effect: positive impact through supporting the circular economy and providing employment opportunities within the waste and environmental sector.

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

Likely effect: the proper management of waste reduces pollution risks and supports healthier living environments.

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 by delivering a substantial and sustained reduction in operational carbon emissions from all new development through mandatory net zero requirements and application of the energy and cooling hierarchies. By embedding measurable and enforceable performance standards, the policy provides a high degree of certainty that development will contribute directly to achieving net zero and improving resilience to climate impacts.

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

Likely significant effect: major positive impact by requiring efficient use of energy, water and materials, including compliance with water consumption targets and BREEAM standards, resulting in reduced resource use and improved environmental performance.

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: the policy is likely to encourage sustainable construction methods and design measures in new homes that improve energy performance and increase resilience to overheating, flooding and extreme weather events.

- **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.

- **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. Improved building performance and climate-responsive design will support better thermal comfort and air quality, reducing health risks associated with overheating and poor environmental conditions.

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Policy CE2 Operational carbon and energy balance

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact with delivery of a significant reductions in operational carbon emissions through a clear requirement for net zero carbon development, supported by energy performance targets, maximised on-site renewable energy generation and a shift away from fossil fuels. Measurable standards and post-occupancy monitoring provides a high degree of certainty that development will achieve sustained carbon reduction and contribute to long-term climate resilience.

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

Likely significant effect: major positive impact through promotion of highly efficient energy use and low carbon energy supply, reducing reliance on fossil fuels and improving overall resource efficiency.

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: the policy is likely to encourage sustainable design measures in new homes that improve energy performance and deliver on-site renewables, lowering residential energy bills by building homes to be energy efficient.

- **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, helping communities adapt to changing environmental and economic conditions.

- **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.

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

Likely significant effect: major positive impact on requiring developments to supply and use energy efficiently with the most viable and sustainable energy option, improving energy efficiency across and reducing environmental impacts associated with conventional energy sources. The use of cleaner fuels can reduce air pollutants. The use of waste heat and shared energy infrastructure supports more efficient use of resources at scale.

Minor Positive Effect:

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

Likely effect: minor positive impact on improving energy resilience and security of households, particularly in higher density areas by reducing dependence on national energy infrastructure and enabling more stable and potentially lower-cost energy supply over time. This contributes to more resilient and sustainable communities, particularly in the context of rising energy demand and cost pressures.

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 through the delivery of significant reductions in whole life carbon emissions, including embodied carbon associated with materials, construction and demolition. By requiring whole life carbon assessments and the application of circular economy principles, development will minimise emissions across the building lifecycle, supporting long-term progress towards net zero.

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

Likely significant effect: major positive impact by promoting the efficient use of materials, and the reduction of construction waste through reuse, recycling and sustainable design, which will reduce pressure on natural resources and landfill, supporting a more resource-efficient and sustainable built environment.

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. The adoption of circular economy principles can support more adaptable and long-lasting development, improving the long-term sustainability and resilience of communities.

Policy CE5 Retrofitting and existing buildings

Major Positive Effect:

- **Objective 6: Accelerate sustainable, climate resilient development**

Likely significant effect: major positive impact since the policy prioritises retrofitting and reuse of existing buildings, significantly reducing lifecycle carbon emissions compared to demolition and rebuild. By requiring energy efficiency improvements and setting performance targets for retrofit schemes, the policy will contribute to long-term decarbonisation of the existing building stock, which is critical to achieving net zero.

Minor Positive Effect:

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

Likely effect: minor positive impact since improving the energy performance and longevity of existing buildings supports more stable and resilient communities, particularly where retrofit contributes to improved living conditions.

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

Likely effect: minor positive impact through the reuse and upgrading of existing buildings, which reduces construction waste, demand for new materials and embodied carbon emissions. This supports a more resource-efficient approach to development, while improving building performance over time.

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

Likely effect: minor 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.

- **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	+
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

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. Furthermore, the policy further encourages sustainable transport through supporting the addition of secure cycle parking such as cycle hangers in existing developments.

- **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. There is also a cycle-network map which shows proposed cycle-routes across the borough.

- **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 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 6: Accelerate sustainable, climate resilient development**

Likely effect: minor positive impact overall as restricting parking will reduce use of private vehicles contributing to the reduction of carbon emissions, even though disabled parking is required in major developments. Where provided, all residential car parking spaces must be equipped with active charging facilities for electric or Ultra-Low Emission vehicles which will have a positive impact on the environment.

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

Likely effect: Minor positive impact as reducing parking provision encourages efficient use of land.

- **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 who can use disabled parking.

Mixed 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, including using the River Thames for public transport. 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.

Summary table

Policy	Sustainability Objectives										
	1	2	3	4	5	6	7	8	9	10	11
P1	+	+	++	+	+	+	+	++	++	+	+
P2	+	0	++	+	+	+	+	+	+	++	+
P3	++	+	++	++	+	+	0	+	+	++	+
P4	+	+	++	+	+	+	+	++	++	+	+
P5	++	+	++	+	+	+	0	+	++	+	+
P6	+	0	+	+	0	0	+	+	+	0	+
P7	0	+	+	+	+	0	0	+	+	0	+
P8	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	0	++
H8	0	0	++	0	0	0	+	+	0	0	++
H9	0	0	+	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	++	++
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	+	++	+	+
TC6	0	+	0	+	0	0	0	0	+	0	++
TC7	0	+	0	++	0	0	0	0	+	0	++
TC8	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	0	+	0	+	+	0	0	+
EN1	+	+	0	+	++	+	++	0	0	0	+
EN2	0	+	0	+	++	+	+	0	0	0	+
EN3	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	++
EN6	0	0	+	+	0	++	++	0	0	0	+
EN7	0	0	+	0	+	++	++	0	0	0	+
EN8	+	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	+
T3	++	++	0	+	+	+	+	0	0	0	+
T4	++	0	+	0	0	+	0	0	+	0	0
T5	+	0	0	0	0	+	0	0	0	+	0

Appendix 3:

Habitats Regulations Assessment Screening

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).

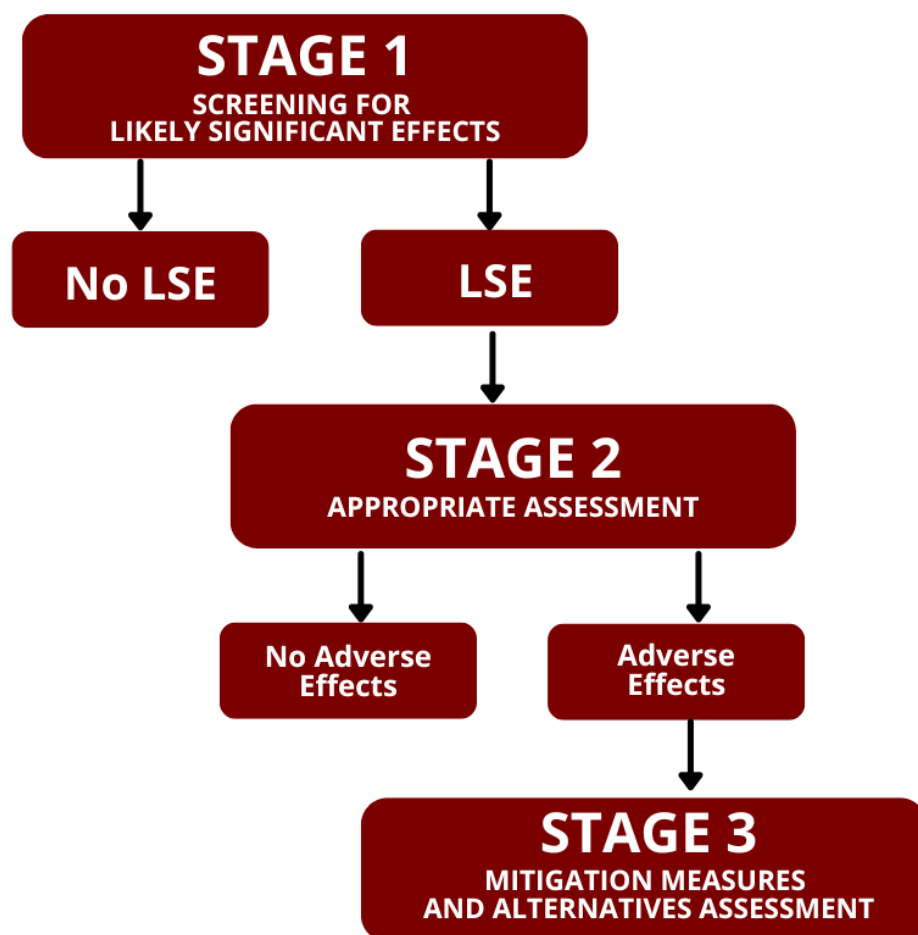


Figure 1: Diagram showing the HRA process.

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

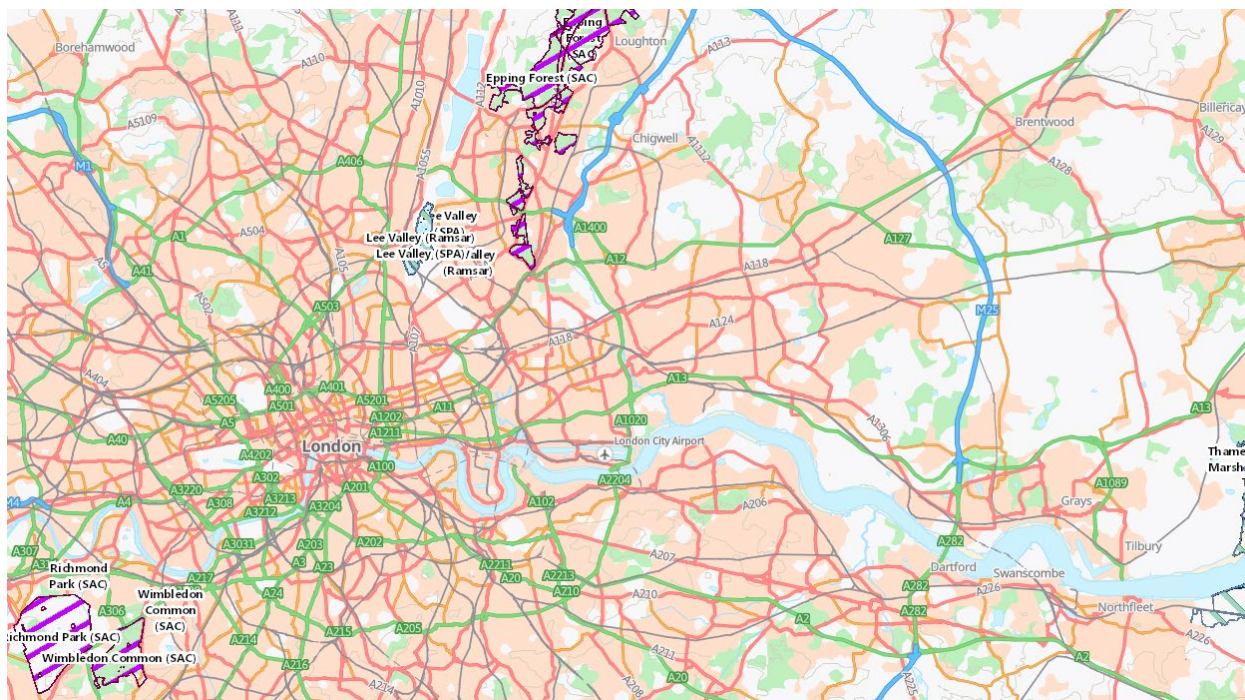
There are no European or Ramsar sites fully or partially in Royal Greenwich, therefore the focus of this assessment will be on sites outside the borough with a potential to be linked to development within Royal Greenwich.

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 for consideration within the Health Impact Assessment.

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, T4
Will it reduce the reliance on private vehicles and promote using low carbon ways of travel?	Be well	-	E2	TC1, TC2,	DH1, DH3	-	CE1	T1, T2, T3, T5
Will it improve the design, safety and accessibility of streets and public spaces?	Be well Stay well	H8, H11	-	TC1, TC4, TC5	DH1, DH3	EN1, EN2, EN5	CE1	T1, T3,
Will it encourage active travel and social interaction?	Be well Feel well	H11		TC1, TC4, TC5	DH1, DH3, DH8	EN1, EN2, EN3		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, H6, H7, H8, H10	-	TC1	DH1	-	-	-
Will it support housing that is energy efficient and climate resilient?	Stay well Age well	H1,H8, H11	-	-	DH1	EN1, EN6, EN7	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, H7	E4, E5	TC1, TC7	-	EN2	CE1	T1, T3, T4
Will it promote social inclusion and reduce inequalities across the Royal Borough?	Start well Stay well	H1, H2, H3, H7	E1, E4, E5	TC3, TC4, TC7	DH1, DH3	-	-	T1, T2, T3,T4
Will it improve open space accessibility for recreation and wellbeing?	Be well Feel well	H11	-	-	DH3, DH8	EN1, EN2	-	T1, T3
Will it support the reduction of carbon emissions in line with net zero targets?	Be well Stay well	H1, H8, H11	E1, E2	TC1, TC2,	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		-	-	DH1, DH8	EN6, EN7	CE1	TT3
Will it improve water and air quality in the borough?	Be well Stay well	-	-	TC2, TC6	DH8	EN4, EN5, EN7, EN8	CE1, CE2	T1, T2, T3, T5
Will it promote access to cultural spaces for wellbeing?	Feel well	-		TC3, TC4	DH4, DH5, DH8	-	-	T1, T4
Will it promote a safe and vibrant night time economy?	Feel well Stay well	-		TC4	DH3	-	-	T3, T4
Will it improve access to training, education and employment for all residents?	Start well Stay well	-	E5	TC7	-	-	-	T4
Will it improve mental and physical wellbeing through safe environments?	Be well Feel well	H2, H3, H7, H11	E1, E5	TC1, TC4, TC5, TC6, TC7	DH1, DH3, DH8	EN1, EN2, EN4, EN5, EN6, EN7, EN8	CE1, CE5	T1, T2, T3, T4, T5
Will it reduce health inequalities across the Royal Borough?	Stay well	H2, H3, H7	E1, E4, E5	TC3, TC6, TC7	DH1, DH3	EN1, EN2, EN4, EN5	CE1, CE5	T1, T2, T3, T4,

Key impacts from Housing policies

Housing policies play a fundamental role in supporting health and wellbeing by ensuring the delivery of high-quality, safe and appropriate homes across the Royal Borough. Access to suitable housing is a key determinant of both physical and mental health, and the Plan establishes a comprehensive framework to meet identified needs while promoting inclusive and sustainable communities.

Policies H1 and H2 support the delivery of a significant quantum of new homes, including a minimum 50% affordable housing provision, helping to address housing insecurity, overcrowding and affordability pressures. These measures are strongly linked to improved mental wellbeing and reduced health inequalities. Policy H3 further contributes by requiring a proportion of family-sized homes, addressing the borough's identified need for larger dwellings and supporting stable family environments.

Policies H4, H5 and H6 support a diverse housing offer that meets different needs across the population, including younger people and transient groups, while ensuring schemes are well-managed, appropriately located and integrated into mixed and balanced communities. Policy H7 makes a particularly important contribution by ensuring that older people, disabled residents and vulnerable groups have access to appropriate, well-located housing with access to services and care.

The quality and design of new homes is addressed through Policies H8 and H11, which require a design-led approach, adequate internal space, good levels of daylight and ventilation, and access to private or communal amenity space and play space. These requirements directly support physical and mental health by creating healthier living environments and encouraging active lifestyles. Policy H1 also ensures that housing growth is aligned with infrastructure capacity, supporting access to healthcare, education, open space and transport, which are key determinants of health.

Overall, the Housing policies support improved health outcomes by increasing access to high-quality and affordable homes, promoting inclusive and stable

communities, and ensuring that development contributes to well-designed, sustainable neighbourhoods.

Key impacts from Economy Policies

Economy policies support health and wellbeing by promoting inclusive economic growth, improving access to employment, and supporting a diverse and resilient local economy. Access to secure employment and income is a key determinant of health, and policies focus on enabling residents to benefit from economic growth through the provision of jobs, skills, and training opportunities.

Policies E1, E4 and E5 support inclusive economic participation by securing affordable workspace, supporting small and medium-sized enterprises, and promoting local employment, training and apprenticeship opportunities. These measures help reduce barriers to employment, particularly for lower-income residents and underrepresented groups, contributing to improved social and economic outcomes.

Policies E2 and E3 safeguard and intensify employment land, supporting job creation and economic resilience, while also promoting more sustainable patterns of freight and industrial activity. By locating employment opportunities within accessible areas and supporting a mix of employment types, the policies contribute to more balanced and inclusive neighbourhoods.

Overall, the Economy policies contribute to improved health outcomes by supporting access to employment and economic opportunity, reducing socio-economic inequalities, and helping to create inclusive and resilient communities across the borough.

Key impacts from Town Centre policies

Town centre policies play an important role in supporting health and wellbeing by promoting vibrant, inclusive and accessible centres that act as hubs of community life. By directing a mix of uses to highly accessible locations the Policies TC1 and

TC2 reduce the need to travel by car and improve access to essential services and opportunities.

Policies TC3 and TC4 strengthen the role of town centres as destinations for culture, leisure and the evening and night-time economy, supporting social interaction, community cohesion and improved mental wellbeing. These policies promote a diverse and inclusive offer, while ensuring that impacts on residential amenity and community safety are carefully managed.

Policies TC5 and TC7 support access to markets, community infrastructure and social facilities within centres, helping to ensure that residents can access healthy food, services and social spaces locally. This contributes to healthier lifestyles, supports local economic participation and reduces health inequalities by improving access for all groups, including more vulnerable residents.

Policy TC6 makes a particularly important contribution to public health by managing the location and concentration of hot food takeaways and gambling uses. By limiting clustering, particularly near schools and in areas of higher deprivation, and promoting healthier food options, the policy helps address issues such as obesity and addiction, supporting improved long-term health outcomes.

Overall, the policies support healthier, more inclusive and resilient communities by enhancing access to services, promoting active and social environments, supporting cultural participation, and addressing key public health challenges, while ensuring that centres remain safe, vibrant and adaptable places.

Key impacts from Design and Heritage policies

The Design and Heritage policies make a significant and wide-ranging contribution to health and wellbeing by promoting high-quality, inclusive and sustainable environments.

DH1 establishes a design-led approach that prioritises accessibility, safety, environmental quality and community wellbeing. It requires development to deliver inclusive environments with legible layouts, step-free access and high-quality public realm, supporting independence and accessibility for all users, particularly older people, children and disabled residents.

Policies DH1 and DH3 promote the creation of walkable, attractive and well-connected neighbourhoods, integrating green infrastructure, high-quality amenity space and active travel routes. These measures directly support physical activity, social interaction and improved mental wellbeing. The application of the Healthy Streets approach and provision of outdoor seating, play space and greening further enhance wellbeing outcomes.

Safety and perceptions of safety are addressed through requirements in DH1, including natural surveillance, active frontages, well-lit routes and Secured by Design principles. These measures reduce crime and fear of crime, contributing positively to mental wellbeing and enabling greater use of public space by all groups.

Environmental sustainability and resilience are embedded within DH1, which requires energy-efficient buildings, urban greening, sustainable drainage and mitigation of overheating and flood risk. These measures reduce exposure to environmental hazards such as air pollution, heat stress and flooding, supporting both physical health and long-term resilience, particularly for vulnerable groups.

DH2 plays an important role in managing higher density development, requiring careful consideration of microclimate, daylight, wind and amenity impacts. This helps to ensure that intensification does not compromise living conditions or public realm quality.

DH4 contributes to health and wellbeing by protecting and enhancing the borough's historic environment. Conservation and adaptive reuse of heritage assets support sense of place, cultural identity and community cohesion, which are important determinants of mental wellbeing.

The requirement for Health Impact Assessments under DH1 ensures that health considerations are embedded early in the design process for major development, helping to identify potential impacts and secure mitigation measures, including addressing health inequalities.

Overall, the Design and Heritage policies deliver substantial health benefits by creating high-quality, safe and inclusive environments, promoting active and social lifestyles, improving environmental conditions, and reinforcing local identity and wellbeing.

Key impacts from Environment Policies

The Environment policies provide a comprehensive and integrated framework to protect and enhance environmental quality, with significant benefits for health and wellbeing across the Royal Borough. Policy EN1, as the overarching strategic policy, plays a key role in delivering a borough-wide network of green and blue infrastructure, improving access to nature, supporting active lifestyles, and enhancing mental wellbeing through greener, more attractive environments.

Policies EN2 and EN3 further strengthen these outcomes by protecting and enhancing open spaces and biodiversity, including improving access to nature and supporting recreation, social interaction and community cohesion. These policies collectively help to reduce stress, improve physical activity levels, and support long-term mental and physical health.

Policies EN4 and EN5 make particularly important contributions to health by addressing air quality and wider environmental impacts such as noise, light, odour and land contamination, thereby reducing exposure to pollutants and improving living conditions.

Policies EN6 and EN7 support health through improving resilience to flood risk and climate change. EN6 ensures development is located and designed to minimise flood risk, while EN7 promotes the use of Sustainable Drainage Systems (SuDS), which not only manage surface water but can also enhance green infrastructure, contribute to amenity, and support healthier environments.

Policy EN8 also contributes positively by supporting effective waste management and the circular economy, reducing environmental hazards associated with waste and supporting cleaner, safer communities.

Overall, these policies work together to reduce environmental risks, enhance access to high-quality green spaces, and create healthier, more resilient neighbourhoods. These benefits are particularly important for vulnerable groups and communities

experiencing environmental inequalities, helping to promote more equitable health outcomes across the borough.

Key impacts from Climate Emergency Policies

The Climate Emergency policies make a strong and focused contribution to health and wellbeing, primarily through reducing carbon emissions, improving building performance, and increasing resilience to climate change. The chapter establishes a clear framework for delivering net zero carbon development, while ensuring that new and existing buildings are designed to be safe, efficient, and adaptable to future climatic conditions.

A central element of the policies is the requirement for net zero carbon buildings, supported by ambitious standards for energy efficiency, renewable energy generation, and the elimination of fossil fuel use. These measures will help to reduce greenhouse gas emissions and improve air quality by minimising reliance on polluting energy sources. Improved air quality and reduced carbon emissions have clear benefits for both physical health and environmental quality.

The policies also place strong emphasis on climate-resilient design, particularly through Policy CE1, which requires developments to minimise overheating risk, reduce energy demand, and incorporate water efficiency measures and sustainable construction methods. This approach supports healthier internal environments, reducing risks associated with excess heat, poor ventilation, and high energy consumption, particularly for vulnerable groups.

The integration of nature-based solutions and passive design measures further supports health and wellbeing by improving thermal comfort, reducing urban heat island effects, and contributing to environmental quality. These measures also complement wider design and green infrastructure policies, helping to create more comfortable and resilient places.

Policies CE2 and CE4 ensure that developments minimise emissions across their full lifecycle, including construction, operation, and eventual decommissioning. This

contributes to long-term environmental sustainability and reduces cumulative impacts on climate, which are increasingly recognised as key determinants of population health.

Policy CE3, while primarily an infrastructure policy, contributes indirectly to health by supporting cleaner energy generation and improving long-term energy resilience.

The emphasis on retrofitting and improving existing buildings within Policy CE5 plays a critical role in reducing emissions from the existing building stock, which is a major source of carbon emissions. Retrofitting improves thermal efficiency, reduces energy costs, and enhances indoor environmental quality, contributing to improved comfort and helping to address issues such as fuel poverty and health inequalities.

Overall, the Climate Emergency policies support health and wellbeing through reducing emissions and improving air quality, creating healthier indoor and outdoor environments, enhancing resilience to heat and extreme weather, and improving energy efficiency in ways that help lower energy costs. The policies make an important contribution to both mitigating and adapting to climate change, ensuring that development supports a healthier, more sustainable and resilient borough over the long term.

Key impacts from Transport Policies

Transport policies play a significant role in supporting health and wellbeing by promoting active travel, improving accessibility, and creating safer and more inclusive environments across the Royal Borough. The Plan prioritises walking, cycling and public transport, encouraging a shift away from car dependency and supporting more physically active lifestyles, which contribute to improved physical health and mental wellbeing.

Policies T1 and T3 support the delivery of safe, accessible and attractive streets through the Healthy Streets approach, improving conditions for walking and cycling and enabling social interaction. Enhancements to the public realm, including improved lighting, street design and urban greening, help create environments that

feel safe and welcoming for all users, particularly children, older people and disabled residents.

Policies T2 and T4 support more sustainable and inclusive travel patterns by managing car use, improving access to public transport, and ensuring that development is well connected to services, employment and community facilities. Measures such as car-free development in accessible locations, improved connections to transport hubs, and appropriate provision for disabled parking help reduce barriers to movement and support equitable access across the borough.

Policy T5 contributes to improved environmental health by supporting more sustainable freight and servicing, helping to reduce congestion, emissions and associated air quality impacts. Together, these policies reduce exposure to traffic-related pollution and road danger, supporting healthier living environments.

Overall, the Transport policies support healthier and more inclusive communities by enabling active travel, improving access to key services and opportunities, reducing environmental impacts, and delivering safer, more people-focused streets.

Potential adverse health impacts

While the Local Plan policies are expected to deliver significant positive health outcomes overall, a number of potential adverse impacts may arise from development and growth across the borough.

Increased housing delivery and intensification may place additional pressure on infrastructure, including healthcare, education and open space provision, particularly where delivery does not keep pace with population growth. Similarly, increased activity within town centres and employment areas may give rise to noise, disturbance, air pollution and potential conflicts between residential and commercial uses.

Higher-density development, including tall buildings, has the potential to result in localised impacts such as overshadowing, wind effects, changes to microclimate, and reductions in daylight or amenity. Increased use of open spaces may also lead

to overuse or degradation if maintenance and management are insufficient. Traffic management and reallocation of road space may result in displacement of traffic and associated environmental effects in some locations.

Construction and implementation of development will generate temporary adverse impacts, including noise, dust, disruption to services, and reduced amenity for existing residents. Retrofit and climate mitigation measures may also result in short-term disruption or cost implications, which could affect affordability in some cases.

However, the Local Plan embeds a range of mitigation measures to address and manage these impacts. This includes strong policy requirements relating to design quality, environmental standards, infrastructure provision, and environmental protection and mechanisms such as the Agent of Change principle, which ensures that new development is designed to mitigate the impacts of existing uses. Policies across the Plan require development to minimise impacts relating to amenity, air quality, noise, and safety, and to incorporate appropriate mitigation from the outset.

Planning decisions are made through the balanced application of the development plan as a whole, requiring the careful weighing of competing objectives, including the delivery of homes, economic growth, environmental protection, and the safeguarding of amenity and health. Through this approach, potential adverse impacts are considered alongside the benefits of development, ensuring that appropriate mitigation is secured from the outset to minimise impacts relating to amenity, air quality, noise, and safety, and to achieve the most sustainable and health-supportive outcomes overall.

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. This Equalities Impact Assessment (EqIA) has been prepared in accordance with the Council's responsibilities under the Equality Act 2010, including the Public Sector Equality Duty set out in Section 149 of the Act. This requires the Council to have due regard to the need to:

- eliminate discrimination, harassment and victimisation;
- advance equality of opportunity between persons who share a protected characteristic and those who do not; and
- foster good relations between different groups.

An EqIA is a systematic way of assessing the potential impacts (positive, neutral or negative) that a policy, plan or service may have on people with different protected characteristics. The Equality Act 2010 identifies the following protected characteristics:

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

This EqIA framework has been developed in accordance with the Council's Equalities Impact Assessment guidance. In addition to the protected characteristics set out in the Equality Act 2010, the Council's guidance also requires consideration of groups defined by caring responsibilities and socio-economic background, recognising their strong relationship with inequality and access to opportunities.

The purpose of the EqIA is to assess the likely impacts of the Regulation 19 Draft Local Plan policies on different groups, identify where these impacts are positive or may require mitigation, and inform the plan-making process. The assessment draws on evidence from the Integrated Impact Assessment (IIA), relevant baseline data, and policy analysis. Impacts are categorised as 'high', 'medium', 'low' or 'none', reflecting the scale and significance of the likely effect. These categorisations are informed by professional judgement, drawing on the IIA findings and available

evidence.

While many of the IIA sub-criteria have indirect implications for equality, the following were identified as being the most directly relevant to this assessment.

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?

Spatial Policies	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	Medium	Low	None	Low	None	Low	Medium	High
- These policies promote inclusive outcomes through a comprehensive place-based approach to growth, ensuring that development reflects the distinct characteristics, needs and opportunities of diverse communities. The strategy recognises the borough's varied spatial areas, from internationally significant heritage locations to major regeneration zones and suburban neighbourhoods, and seeks to deliver inclusive and sustainable growth across all areas. - The policies prioritise inclusive regeneration in key growth locations, which are identified for substantial housing, employment and infrastructure delivery, supporting mixed-use development and creating new communities with access to jobs, services and social infrastructure. This approach helps to reduce spatial and socio-economic inequalities by directing investment to areas with the greatest need and opportunity. - A central element of the spatial strategy is the promotion of mixed and balanced communities, with policies requiring development to contribute to housing delivery across a range of tenures, including affordable housing, and to integrate community, cultural and employment uses. This supports social inclusion and ensures that growth benefits a wide range of residents. - The spatial policies also place strong emphasis on connectivity and accessibility, focusing development in well-connected locations and promoting sustainable transport infrastructure. Improvements to walking and cycling routes and major public transport investments enhance access to employment, education and services across the borough. These measures are particularly important for those without access to private vehicles, including lower-income households, older people and disabled people. - Across all spatial areas, the policies support high quality placemaking, including investment in public realm, green infrastructure and open spaces. This contributes to the creation of safe, healthy and inclusive environments, improving wellbeing for residents and enhancing biodiversity and climate resilience. In heritage-led areas such as Greenwich and Blackheath, development is carefully managed to preserve character. - The policies also support equitable access to services and facilities, strengthening town centres and local hubs which provide access to healthcare, education, retail and community uses, helping to create more self-sufficient neighbourhoods and reduce the need for long-distance travel. - Particular positive impacts are identified for disabled people, due to the strong focus on accessible environments, improved connectivity and proximity to services, and for lower-income groups, through regeneration, affordable housing delivery and improved access to economic opportunities. The inclusion of specific provision for Gypsy and Traveller communities represents a direct positive impact for ethnic minority groups. - Overall, the spatial policies are expected to make a significant positive contribution to equality by improving access to opportunities and supporting inclusive, well-connected and sustainable communities. Delivery of these outcomes will depend on implementation through site-specific proposals and associated infrastructure provision.										

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	Low	Medium	Low	None	None	None	None	Low	High
- Economy policies support equality by promoting inclusive economic growth, improving access to employment opportunities, and ensuring that the benefits of investment are shared across the Royal Borough. The overarching approach set out in Policy E1 supports a strong, diverse and inclusive economy by protecting employment land, securing affordable workspace and promoting access to jobs, skills and training for local residents. - Policies E1, E2 and E3 support the protection and intensification of employment land and premises across a range of locations, helping to sustain a diverse labour market and ensure that employment opportunities are available locally. Locating jobs within accessible areas supports participation for a wide range of groups, particularly older people, younger people and disabled residents who may face barriers to travelling longer distances. It also benefits those from lower socio-economic backgrounds by improving access to employment without reliance on private vehicles. - Policy E4 makes a particularly important contribution to equality by requiring the delivery of affordable workspace to support small and medium-sized enterprises, start-ups and the creative and cultural sectors. This supports a more diverse and inclusive local economy by enabling entry and participation for underrepresented groups, including younger people, ethnically diverse communities and those with limited financial resources. By supporting a range of business types and sizes, the policy helps reduce barriers to entrepreneurship and improves access to economic opportunities. - Policy E5 supports local employment, training and skills development through measures such as Employment and Skills Plans and contributions to local initiatives including Greenwich Local Labour and Business (GLLaB). These measures help address structural barriers to employment experienced by certain groups such as younger people and those from lower socio-economic backgrounds, helping to improve access to training, apprenticeships and long-term job opportunities. This contributes to reducing inequalities in income, employment and life chances. - Across the chapter, there is a strong emphasis on inclusive growth and local economic participation, helping to ensure that regeneration and investment create opportunities for a wide range of groups. While there are limited explicit references to specific protected characteristics such as gender, sexual orientation, gender identity or religion, the policies provide indirect benefits through improving access to employment, supporting growth and reducing economic barriers. - Overall, the Economy policies support more inclusive and equitable outcomes by improving access to employment and skills, supporting local enterprise, and enabling a broader range of people to participate in and benefit from economic growth.										

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	Medium	Medium	Medium	Low	Low	Medium	High
- Town Centre policies support equality by promoting inclusive, accessible and well-connected centres that provide a wide range of services, employment opportunities and community facilities in sustainable locations. By directing development to centres and limiting out-of-centre uses, Policies TC1 and TC2 help to reduce inequalities in access, particularly benefiting older people, disabled residents and those from lower socio-economic backgrounds who may have limited access to private vehicles. - Policies TC3 and TC4 support inclusive access to cultural, leisure and evening economy uses, helping to ensure that opportunities for social interaction and participation in community life are accessible to a diverse range of groups, including people from different racial and cultural backgrounds, as well as younger people, women and LGBTQ+ communities. Measures to promote safety and inclusive programming within the evening and night-time economy can particularly benefit groups who may otherwise feel excluded or unsafe in these environments. - Policy TC5 supports markets and meanwhile uses, providing low-cost and accessible opportunities for local enterprise and community activity. These can benefit a wide range of groups, including ethnically diverse communities, younger people and those from lower socio-economic backgrounds, by improving access to affordable goods, services and economic participation. - Policy TC7 plays a key role by protecting and delivering social and community infrastructure in accessible locations, supporting equitable access to healthcare, education and community facilities. This is particularly important for older people, disabled residents, people with caring responsibilities, and those who are pregnant or have young children, through the provision of inclusive design and facilities such as accessible toilets and community spaces. - Policy TC6 contributes to reducing health inequalities by managing the concentration of hot food takeaways and gambling uses, helping to address issues that disproportionately affect lower-income communities and younger people. - Overall, the Town Centre policies support more inclusive, accessible and resilient communities by improving access to services, supporting participation in economic and social life, and helping to reduce inequalities across a range of protected characteristics.										

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	None	Low	None	Low	Low	Medium
These policies support equality by ensuring that new development delivers high-quality, inclusive and accessible environments that enhance wellbeing, safety and community cohesion. - Policy DH1 makes a significant contribution through its requirement for inclusive and accessible design for all users, embedding universal design principles from the outset. This includes safe and welcoming public and private spaces, legible layouts, and environments that support walking, social interaction and community wellbeing. These measures provide clear benefits for disabled people, older people, children and those with caring responsibilities. - Policy DH3 promotes safe, inclusive and well-designed streets and spaces, including natural surveillance, good lighting and permeability, which improve perceptions of safety and usability, particularly benefiting groups who may feel more vulnerable in public space, including women, older people and children. - The emphasis on health and wellbeing, including the requirement for Health Impact Assessments for major development, strengthens the role of design in addressing health inequalities and ensuring that development outcomes contribute positively to all communities. - Heritage policies protect and enhance access to heritage assets, conservation areas and important views. These policies support cultural identity, community pride and access to historic environments, contributing to wellbeing and social cohesion. However, effects are generally indirect, with benefits experienced across the population rather than targeted at specific groups. - Policy DH7 contributes to inclusive and safe environments by promoting active frontages, good visibility and accessible entrances. These measures support safer and more welcoming town centres. - Policy DH8 promotes accessible and inclusive riverside environments, including continuous public access, improved connectivity and high-quality public realm. This benefits a wide range of users, particularly those without access to private space or transport. - Across the chapter, there is a strong and consistent emphasis on inclusivity, accessibility, safety and wellbeing, including explicit references to disabled people, mobility-impaired users and inclusive environments. These policies also benefit children, older people, and those with caring responsibilities through improved design, accessibility and public realm quality. - While there are limited explicit references to some protected characteristics, including sexual orientation, gender identity and religion, the policies provide indirect benefits through improvements to safety, accessibility, health and quality of place. - Overall, the Design and Heritage policies contribute to equality by embedding inclusive design principles, enhancing accessibility and safety, improving the quality of the built environment, and ensuring that development contributes to healthier, more inclusive communities.										

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	Medium	Low	Low	None	None	None	Low	Low	Medium
- These policies support equality by improving environmental quality, enhancing access to green and blue infrastructure, and reducing exposure to environmental risks across the Royal Borough. The overarching approach seeks to ensure that environmental benefits such as clean air, access to open space and climate resilience are distributed more equitably across communities. - Policies EN1, EN2 and EN3 focus on the protection and enhancement of green and blue infrastructure, open space and biodiversity. These policies are expected to provide significant benefits for a range of groups, including children, older people and those from lower socio-economic backgrounds, improving access to nature, supporting opportunities for physical activity and social interaction, and enhancing mental wellbeing. They also support inclusive access through improved design and connectivity of green spaces, which is particularly beneficial for disabled people where accessibility is embedded in design. - Policies EN4 and EN5 address air quality and wider environmental impacts such as noise, light, odour and land contamination. These policies contribute to reducing health inequalities by limiting exposure to environmental hazards that disproportionately affect vulnerable groups, including children, older people, disabled residents and those living in more deprived areas. Improving air quality and reducing pollution also benefits people with existing health conditions. - Policies EN6 and EN7 support climate resilience through the management of flood risk and the delivery of sustainable drainage systems. These policies help protect communities from flooding and climate-related risks, which can have disproportionate impacts on vulnerable groups, including older people, disabled residents and lower-income households who may have fewer resources to respond to environmental hazards. By ensuring development is safe and resilient, the policies support long-term health, safety and wellbeing. - Policy EN8 supports strategic waste management and the circular economy, contributing to improved environmental conditions and reducing pollution risks. This benefits all residents, particularly those in more densely populated or deprived areas where environmental quality may otherwise be poorer. - Across the chapter, there is a consistent emphasis on improving environmental conditions, enhancing access to green space, and supporting healthier living environments. These measures particularly benefit groups such as children, older people, disabled residents and those with caring responsibilities, as well as individuals from lower socio-economic backgrounds who are more likely to rely on public open space and be more exposed to environmental risks. - While there are limited explicit references to some protected characteristics, including gender, sexual orientation, gender identity and religion, the policies provide broad indirect benefits through improving environmental quality, reducing health risks and supporting more equitable access to resources. - Overall, the Environment policies promote more equal outcomes by improving environmental conditions, reducing exposure to risks, and ensuring that the benefits of a healthier and more resilient environment are shared across all communities.										

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	None	None	None	None	Low	Medium	High
- The Climate Emergency policies support equality primarily through improving environmental quality, reducing energy costs, and enhancing resilience to climate impacts. - Policy CE1 promotes climate-resilient and net zero design, including passive design measures, reduced energy demand, and integration of nature-based solutions. These measures help create more comfortable, healthier indoor and outdoor environments which particularly benefits vulnerable groups such as older people, children, and those with existing health conditions. - Policy CE2 introduces requirements for operational energy performance, including limits on energy use intensity, elimination of fossil fuel heating, and maximisation of on-site renewable energy generation. By improving building energy efficiency, these policies can reduce energy costs, supporting those on lower incomes and helping to address fuel poverty. Improved energy performance also benefits health and wellbeing through better thermal comfort although care will be required to ensure that the costs associated with meeting environmental standards do not disproportionately affect lower-income households. - Policy CE3 supports decentralised energy systems and low-carbon heat networks, helping to deliver efficient and resilient energy supply infrastructure. These systems can contribute to long-term affordability and energy security. - Policy CE4 promotes whole life carbon reduction and circular economy principles, including reuse of materials and minimisation of embodied carbon. While primarily environmental, these policies support sustainable resource use and can indirectly benefit communities through improved environmental quality. - Policy CE5 supports retrofitting existing buildings, including improved insulation, energy efficiency and reduced carbon emissions. Retrofitting can deliver significant benefits for residents, particularly through lower energy bills, improved indoor comfort, and reduced fuel poverty. These impacts are especially relevant for low-income households, older people, and those spending more time at home. - Across the chapter, there is a strong emphasis on reducing overheating, improving thermal comfort, and enhancing climate resilience, which supports health and wellbeing. These measures are particularly important for vulnerable groups, including older people, children, and people with disabilities or health conditions, who may be disproportionately affected by extreme temperatures and poor housing conditions. - The policies support improved environmental quality, including reduced emissions and air pollution, which benefits the whole population. They contribute to equality by improving living conditions, reducing energy costs, enhancing resilience to climate risks, and contributing to healthier and more sustainable communities. However, direct impacts on some protected characteristics, such as gender identity, sexual orientation and religion, are limited.										

Conclusions

The Equalities Impact Assessment demonstrates that the Regulation 19 Draft Local Plan is expected to have broadly positive effects in promoting equality and inclusion across the Royal Borough. No significant adverse impacts have been identified at this stage, although it is recognised that, as a strategic assessment, some impacts will depend on implementation through individual development proposals.

The assessment identifies a range of positive outcomes across protected characteristics, particularly in relation to age, disability and socio-economic background. These benefits arise from policies that promote inclusive design, improve access to housing and services, support sustainable transport, and enhance environmental quality.

The Council recognises that individuals and groups with lived experience are best placed to understand how policies may affect them. Consultation on the Regulation 19 Draft Local Plan will therefore play a key role in identifying any unintended impacts.

The Council will continue to monitor the equality impacts of the Local Plan through implementation, using relevant indicators where available, in order to ensure that the Local Plan contributes to a fairer, more inclusive and accessible borough for all residents.